

# Statement on the Modern Slavery Act 2015

## March 2019

This statement is made on behalf of Sun Life Assurance Company of Canada (U.K.) Limited and the other subsidiaries of SLF of Canada UK Limited (together “SLF UK”).

We are committed to ethical practice in all of our business dealings and are taking steps to prevent modern slavery, human trafficking and child labour in our business and our supply chains.

We make the following statement in support of that aim and also in compliance with section 54 (1) of the Modern Slavery Act 2015 (“**The Act**”).

### About us

SLF UK is a group of companies whose business is the provision of financial services, and we have been looking after customers and employing staff in the UK since 1893. We are based in Basingstoke but we are part of the global Sun Life Financial Group whose headquarters are in Toronto in Canada. SLF UK is committed to developing proactive measures to prevent modern slavery, human trafficking and child labour in our business and in our supply chain.

### Our Staff

Our employees enjoy all the statutory employment rights to which they are entitled in the UK and our Human Resources department ensures our employees have the legal right to work in the UK. Employees, and any temporary staff who we engage, are paid above the minimum wage, are provided with safe working conditions and are treated with dignity and respect.

### Our Suppliers

SLF UK’s supply chain comprises various outsourcing arrangements and third party suppliers (together “suppliers”), which are tiered and categorised based on their materiality to SLF UK. The range of products and services procured from our suppliers include, but are not limited to, policy administration services, investment management services, IT software and maintenance, professional services, catering, cleaning and recruitment services.

Since The Act came into force we have made it our policy to ensure that:

- 1) compliance with the Act is included as a term of our supply contracts;
- 2) regular assurances are sought that suppliers are taking steps to ensure there is no modern slavery, human trafficking and child labour in any part of its business and supply chains; and
- 3) appropriate and proportionate due diligence, and enhanced due diligence where necessary, is undertaken to understand a supplier’s position on modern slavery, human trafficking and child labour and whether they have sufficient controls in place.

When entering into major contracts we always undertake enhanced due diligence to ensure, not only that the services can be supplied and the financial stability of the third party organisation, but also that the culture and ethics of that organisation is aligned with our own. We have paid particular attention to those of our suppliers with overseas subsidiaries, offices and employees.

We found our suppliers represent a low risk of modern slavery and, to date, we have not identified any causes of concern.

In the unlikely event that responses from our suppliers are inadequate, or that we have other causes for concern, we will take suitable actions, including reporting where appropriate.

## Training for Staff

All staff have access to specific guidance on The Act to ensure they have the knowledge and skills when dealing with and assessing our suppliers, as well as awareness of our internal reporting procedures and the risks of modern slavery, human trafficking and child labour in SLF UK's business and in our supply chains.

Those involved in the recruitment of our employees or with procurement have been given specific guidance on the terms of The Act.

All employees are required to complete an annual attestation to the SLF UK Code of Business Conduct (the "Code"), which underpins our values and places an obligation on employees to report any suspected breaches of the Code.

Our Whistleblowing Policy promotes the reporting of modern slavery concerns and provides protection for any employees who do so. New employees will be informed of the policy at their introduction. It is already an embedded principle within SLF UK's Code of Business Conduct that employees must be treated with respect and dignity and any allegations to the contrary, or that the working conditions have been made unsafe, will be treated with the upmost seriousness.

## Policies

All SLF UK policies are governed by a master framework which describes the development, approval and management of policies. The principle policies of SLF UK which assist us in achieving compliance with The Act are as follows:

- The Ethics Policy
- The Whistleblowing Policy
- The Modern Slavery Act Statement
- The Health and Safety Policy
- The Compensation and Appointment Policy
- The Code of Business Conduct

These, together with other internal procedures ensure that:

- recruitment procedures do not engage in or procure slavery, servitude, child labour or human trafficking;
- guidance is available to those who recruit on behalf of SLF UK so they are aware of these obligations;
- training to all employees is given to ensure they are aware that they may and should report any modern slavery concerns to the Head of Legal;
- protection for employees making such reports is provided in the form of a Whistleblowing Policy which makes direct reference to The Act; and
- appropriate checks on new and existing suppliers which may detect slavery, servitude, child labour or human trafficking in our supply chain are made.

In the last financial year SLF UK has:

- developed key performance indicators to be used by SLF UK Senior Management to measure our effectiveness;
- included in its induction process SLF UK's position on modern slavery, human trafficking and child labour;
- continued to carry appropriate and proportionate due diligence and enhanced due diligence where necessary on new and existing suppliers;
- sent a communication to all staff and contractors refreshing their knowledge and requirements of the Act; and
- continued to include appropriate clauses in material supply contracts to ensure compliance with all applicable laws, including those relating to modern slavery and human trafficking.

As part of SLF UK's commitment, in 2019 we will:

- continue to engage with our suppliers;
- assess our due diligence and enhanced due diligence assessment process and procedures to ensure they continue to be appropriate;
- review our key performance indicators; and
- schedule training for employees and contractors, as appropriate.

### Responsibility

We have taken compliance with The Act seriously and we have appointed the Head of Legal, a member of our Senior Management Committee, as the Sponsor of our response to The Act.

The Head of Legal will review and, if necessary, update this statement at least annually and ensure that it and the underlying policies and procedures are complied with internally and with respect to our suppliers

### Board Approval

This statement has been approved by the Board of SLF of Canada UK Limited on behalf of its relevant subsidiaries .

Name: Fleur Hobbs

Position: Company Secretary

Date: 27 March 2019