

Equiniti Group Modern Slavery Policy Statement

1. Introduction

Modern slavery is a crime which violates fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which seek to deprive a person of their liberty in order for them to be exploited for personal or commercial gain.

Equiniti operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business activities and relationships. Equiniti is also committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business and exercising robust due diligence of all its partner organisations and suppliers.

2. About Equiniti

Equiniti provides administration, processing and payment services, as well as smart technology solutions for complex and regulated markets. The Company operates in three key segments: Investment Solutions, Intelligent Solutions, and Pension Solutions. The Company's investment solutions encompass registration services, investment services and employee services businesses. Its investment services offer share-dealing, wealth management and international payments to corporate clients, their employees and retail customers. The investment solutions division offers a range of business-to-business and retail services. Its intelligent solutions include enterprise workflow solutions that automate processes, such as case, complaints, document and people management. The Company's pension solutions offer administration and payment services to pension schemes, pension software, data solutions, and life and pensions administration.

Equiniti is primarily a UK centric product and service provider employing the majority of its workforce from within the UK. Equiniti in the UK does receive services from its 100% owned Indian subsidiary and from a number of very small office functions in The Netherlands, Germany and South Africa.

3. In Equiniti

In terms of UK employees Equiniti pays above the voluntary living wage, and by default above the minimum wage, is compliant with the EU Working Time Directive and does not operate zero hours contracts. Where Equiniti utilises temporary staff it pays above the minimum wage.

In our India office, an anti-sexual harassment policy is enforced, to protect the safety of women. An Equal Opportunities policy ensures that all candidates are considered equally for roles, regardless of caste, colour, creed or orientation. Whilst the Indian minimum wage act does not currently apply to IT staff, Equiniti has a defined pay structure to ensure salaries are competitive and fair in the market.

Equiniti intends to develop a robust audit system to evidence that we act ethically in all our business activities and relationships.

Equiniti deploys a comprehensive range of training modules which are both skills and competency based for all employees, irrespective of jurisdiction. One of the learning modules which all employees are mandated to take on a regular basis concerns Modern Slavery awareness. Equiniti has in place a range of people policies, and underlying processes for managing performance development reviews, disciplinary and grievance, absence management and flexible working. Underpinning these employee relations policies are Equiniti's Equality and Diversity, and Standards of Behaviour policies.

All group staff with procurement and outsourcing responsibilities are provided with appropriate training and guidance to ensure that they are able to assess the human rights and labour performance of suppliers.

Equiniti is compliant with all employment related legal requirements in the overseas jurisdictions it operates from and utilises similar or identical people policies to those applying to staff in the UK. Training on required skills and competencies is also provided to all overseas staff.

4. Equiniti's external supply chain

The group is opposed to modern slavery and human trafficking in all of its direct operations and in the indirect operations of its supply chain.

Equiniti seeks at all times to contract with like-minded suppliers who comply with employment legislation, the EU Working Time Directive and pay the minimum wage. When undertaking supplier due diligence, contract renewals or seeking new suppliers, a range of due diligence activities are undertaken with which to adequately assess whether a supplier is complying with the Modern Slavery Act 2015. Where Equiniti is unable to satisfy itself that a supplier is not aligned to the Act it will firstly work with that supplier to ensure compliance or failing that, terminate the contract.

5. Governance

This Policy Statement applies to all employees and business divisions within the Equiniti Group, regardless of geographic location.

This Policy Statement has been approved by the Equiniti Group plc board of directors and will be reviewed and updated at least annually.

Guy Wakeley
Chief Executive
Equiniti Group plc