

Equiniti Group plc

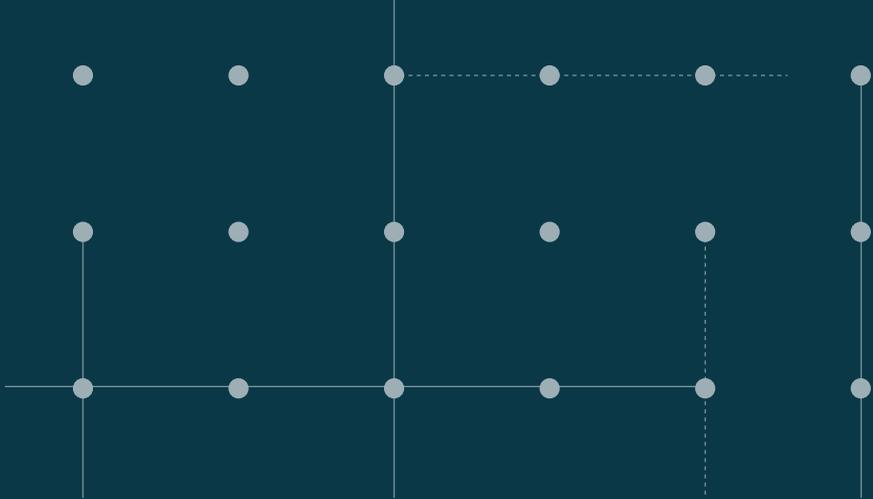
MODERN SLAVERY STATEMENT 2019

This Statement outlines the steps taken in 2019 to ensure that slavery and human trafficking will not take place in either our business or our supply chain.



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Introduction

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes the Equiniti Group plc ("Equiniti") slavery statement for the financial year ended 31 December 2019.

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 of 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 its partner organisations and suppliers.

IN 2019 WE FOCUSED ON:

- Raising colleague awareness of the risks of modern slavery and human trafficking, in particular for all colleagues with procurement or outsourcing responsibilities
- Creating a risk-based internal Modern Slavery Policy, which is the first step in integrating into our enterprise-wide risk management framework
- Reviewing our supply chain risk management processes

We had no reported incidents in 2019.



About Equiniti

Equiniti is an international technology-led provider of technology and solutions for complex and regulated data and payments, serving blue-chip enterprises and public sector organisations.

Equiniti is a public limited company which is listed on the London Stock Exchange, incorporated and domiciled in the United Kingdom, and over half of our 5,300 employees are employed directly within the UK. Equiniti receives services from its 100% owned Indian subsidiary, based in two locations in Chennai and Bangalore. Following the acquisition of Wells Fargo's shareholder services business in 2018, Equiniti has significant operations in the US. We also have a number of very small office functions or remote workers in The Netherlands, Poland, South Africa, Germany, and Morocco.

INVESTMENT SOLUTIONS

Investment Solutions offers a broad range of services, including share registration for around half of the FTSE 100, and the administration of SAYE schemes and share incentive plans for approximately 1.2 million employees. The division also provides share dealing, wealth management and international payments to corporate clients and their employees, as well as direct to retail customers.

INTELLIGENT SOLUTIONS

Intelligent Solutions targets complex or regulated activities to help organisations manage their interactions with customers, citizens and employees. The division offers enterprise workflow for case and complaints management, credit services, on-boarding new clients and specialist resource for rectification and remediation.

PENSION SOLUTIONS

Pension Solutions offers administration and payment services to pension schemes, as well as pension software, data solutions, and life and pensions' administration. The division is a scale provider of pension technology and operates some of the largest pension schemes in the UK. These include the National Health Service scheme, which has more than 2.6 million members, and the Armed Forces Veterans, which we have served continuously since 1836.

EQ US

EQ US offers a range of transfer agent services that enable our clients to manage share registers, communicate with shareowners and undertake significant corporate actions – simply and effectively.



Our People

At Equiniti, we want all colleagues to feel supported, and we have in place a range of people policies and underlying processes to protect employees and to manage performance and disciplinary issues, sickness absence and flexible working requests. There are also clear grievance and appeal policies and processes in place for when things do go wrong. Underpinning all of our people policies is a strong culture of diversity and inclusion, and we have global and local diversity and inclusion councils in operation to ensure fair and equal treatment of employees, supported by policy and strong colleague engagement.

Within the UK, Equiniti pays above the voluntary living wage, and therefore above the UK minimum wage. We comply with the EU Working Time Directive and do not operate zero hour's contracts. Where we utilise temporary employees, we pay above the minimum wage.

Equiniti is compliant with all employment related legal requirements in the international 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 international employees.

Equiniti's US offices meet or exceed all Federal, State and local laws and regulations related to minimum wage, time off, and leaves of absence.

EQ India [Private Limited] enforces an anti-sexual harassment policy, to protect the safety of all its employees, free of any gender prejudice or sexual harassment (including safety from persons coming into contact at the workplace) and has a zero tolerance policy towards any instance of sexual harassment. Equiniti India has a defined pay structure to ensure salaries are competitive and fair in the market.

Our Policies



To align with our enterprise-wide risk management framework, in 2019 we developed a risk-based Modern Slavery Policy. This policy outlines key controls which help assess and manage any risks related to modern slavery and human trafficking. This is the first step in integrating modern slavery and human trafficking risks into our enterprise-wide risk management framework and will allow us to measure effectiveness of the steps taken to manage these risks.

In addition to our people policies outlined above, we have a very clear whistle blowing policy for anyone who wishes to raise concerns safely.





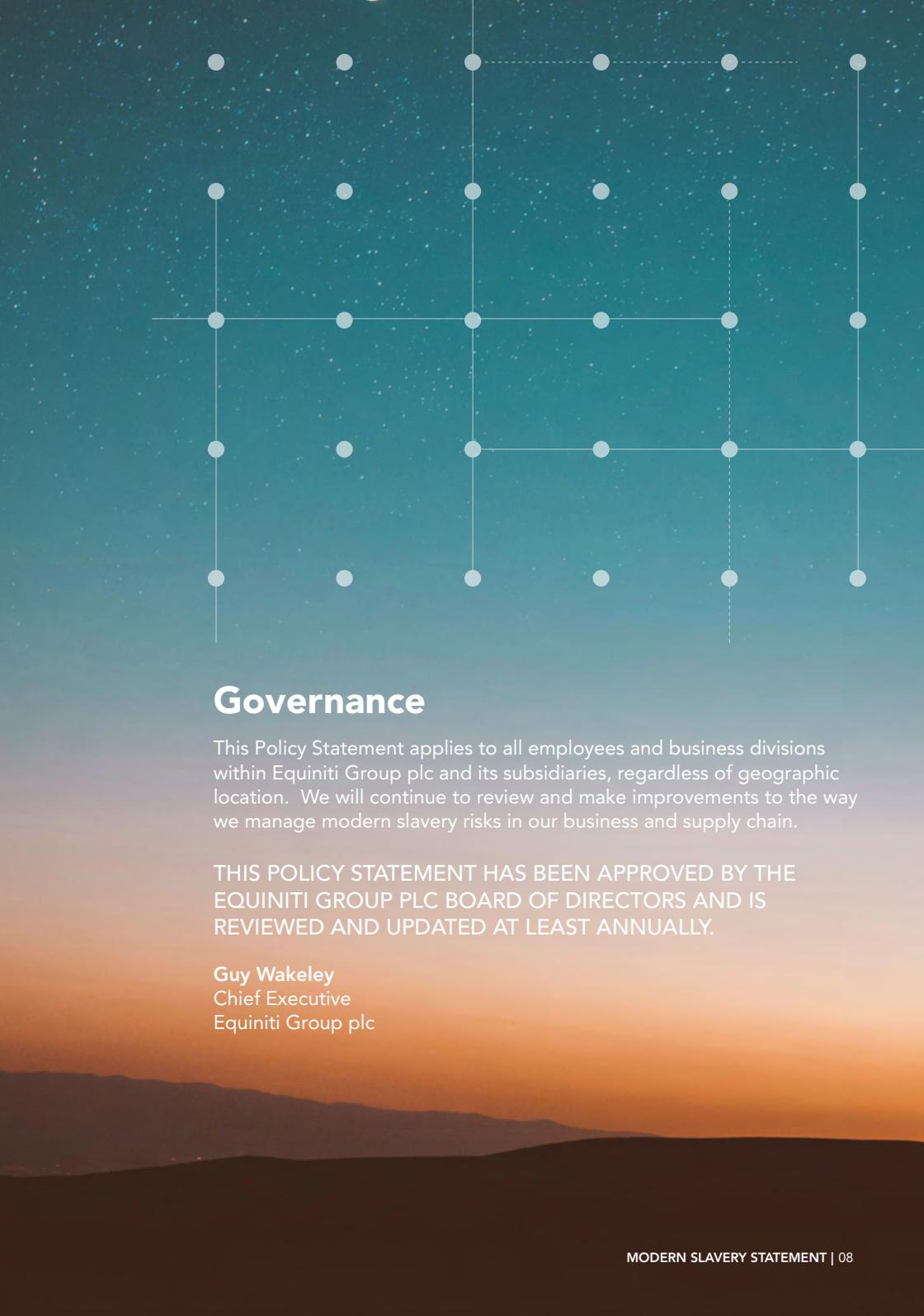
Managing our supply chain

Equiniti's preferred suppliers provide us with technology, human resources, print and mail services, facilities management, travel and professional services. Equiniti segments its suppliers by risk to protect our business and our ability to deliver to our customers.

Equiniti 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. 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.

As part of the Group Procurement Strategy for 2019, we have piloted a Supplier Relationship Management (SRM) programme. An SRM framework has been developed to provide supplier relationship strategies, commensurate with the level of risk and complexity of the relationship, optimising engagement with Critical and Strategic suppliers. To continue to make Equiniti's expectations of suppliers even clearer, including how we expect suppliers to manage any risks related to modern slavery and human trafficking, we intend to introduce an Equiniti Supplier Code of Conduct in 2020.

All Group employees 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.



Governance

This Policy Statement applies to all employees and business divisions within Equiniti Group plc and its subsidiaries, regardless of geographic location. We will continue to review and make improvements to the way we manage modern slavery risks in our business and supply chain.

THIS POLICY STATEMENT HAS BEEN APPROVED BY THE EQUINITI GROUP PLC BOARD OF DIRECTORS AND IS REVIEWED AND UPDATED AT LEAST ANNUALLY.

Guy Wakeley
Chief Executive
Equiniti Group plc