



## **Modern Slavery Act 2015: slavery and human trafficking statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("Act") and constitutes Sanlam Investment Holdings UK Limited's slavery and human trafficking statement for the financial year ending December 2018 and has been approved by the Sanlam Investment Holdings UK Limited board.

### **Sanlam UK's structure**

Sanlam Investment Holdings UK Limited ("Sanlam") is the ultimate holding company for the Sanlam UK Group.

The Sanlam UK Group is a leading provider of wealth and investment management services to private clients, professional advisers, charities, corporates and institutions. We are part of Sanlam, the global financial services group that was established in 1918. Sanlam Limited which is registered in South Africa is our ultimate parent company. The Group provides a range of financial products and services to over 10 million clients globally and is listed on the Johannesburg Stock Exchange. Sanlam has reviewed its corporate structure and determined its international group companies do not carry on a business, or part of a business, in the UK. Consequently this statement applies only to the Sanlam UK Group.

### **Our business and supply chains**

Sanlam has assessed the impact of the Act on its business and the changes required to its policies and processes.

Sanlam has a relatively straightforward supply chain. Our suppliers are typically professional advisers and consultants and suppliers of regulated services (such as custody and investment management), IT, back-office administration services and other office equipment and services. The majority of Sanlam's supply chain is based in the UK. Being a regulated group Sanlam considers it has a low risk of modern slavery or human trafficking within its business operations and supply chain. Nevertheless we understand the importance of combatting modern slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

### **Our policies**

Our existing policies, such as our Whistleblowing Policy, Supplier Code of Conduct, Outsourcing Policy and Anti-Bribery & Corruption Policy reflect our commitment to acting ethically and with integrity in all our business relationships.

An Anti-Slavery and Human Trafficking policy will be put in place during 2019.

Sanlam's policies are reviewed on an ongoing basis and we expect both Sanlam staff and suppliers to adhere to and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **Supplier due diligence**

As part of Sanlam UK's Outsourcing Policy and related due diligence processes, where appropriate for the appointment of suppliers we will:

- as part of our appointment process make suppliers aware that Sanlam UK does not tolerate modern slavery practices in its supply chain;
- require potential key suppliers and outsourcers to disclose the measures taken to comply with their Modern Slavery Act obligations;
- include appropriate contractual terms governing the supplier's compliance with the Act;
- reassess compliance on a regular basis through information requests and ongoing supplier reviews.

Suppliers who are unable to satisfy Sanlam UK as regards their compliance with the Act will not be appointed. We will not knowingly do business with suppliers who are involved in modern slavery.

Since Sanlam's last published statement our outsourcing and due diligence processes have been further enhanced to ensure suppliers are risk assessed and categorised appropriately, these processes have been embedded within the Sanlam UK Group in order to improve the identification, mitigation and management of potential risks, including those related to modern slavery and human trafficking. This includes the enhancement of key supplier information which is obtained and recorded, ensuring the appropriate ownership of supplier relationships.

### Monitoring

Our Legal team, together with Sanlam's Risk Management and the senior managers in the relevant business areas responsible for procurement will manage concerns and ensure they are appropriately escalated and reported to the board of directors. Sanlam's whistleblowing procedures are designed to facilitate reporting if Sanlam staff wish to raise concerns.

### Training

Appropriate training will be considered for key staff as necessary, to enable those staff to understand our obligations under the Act and to recognise and mitigate the risk of modern slavery.

We reiterate our ongoing commitment to Act.



Director  
Sanlam Investment Holdings UK Limited

Date: April 2019

Sanlam is the trading name of the following companies which are registered in England and Wales: Sanlam Investment Holdings UK Limited, No: 07812240 (SIH), Sanlam UK Limited (No: 06575962), Sanlam Private Investments (UK) Limited No: 02041819 (SUK), Sanlam Securities UK Limited, No: 01825671 (SSUK), Sanlam Wealth Planning UK Limited, No: 03879955 (SWP), English Mutual Limited, No: 06685913 (EML), Sanlam Investments UK Limited, No: 05809399 (Sanlam Investments), Sanlam Life & Pensions UK Limited, No: 00980142 (SLP), Sanlam Financial Services UK Limited, No: 02354894 (SFS), Sanlam Trustee Services UK Limited, No: 01489455 (STS), Sanlam Partnerships UK Limited, No: 071823140 (SPL).

EML is the authorised representative of SWP. SUK is the authorised representative of Sanlam Investments, SLP, SPI and SFS. SPI, SSUK, SWP, EML, Sanlam Investments, SFS and SPL are authorised and regulated by the Financial Conduct Authority. SLP is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.