

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 UK Limited's slavery and human trafficking statement for the financial year ending December 2016 and has been approved by the Sanlam UK Limited board.

Sanlam UK's structure

Sanlam UK Limited ("Sanlam UK") is the intermediate holding company for the Sanlam UK group, whose ultimate parent company in the UK is Sanlam Investment Holdings UK Limited.

Sanlam UK is a leading provider of wealth and investment management services to private clients, professional advisers, charities, corporates and institutions. Combined, we manage almost £11.5 billion of client assets from 13 offices across the UK.

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

Sanlam UK has a relatively straightforward supply chain. Our suppliers are typically regulated third parties (such as discretionary fund managers, advisers, custodians and administrators) as well as information systems providers, professional advisers and consultants and suppliers of IT and other office equipment and services. Being a regulated group Sanlam UK 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, Code of Ethics, Outsourcing Policy and Anti-Bribery & Corruption Policy reflect our commitment to acting ethically and with integrity in all our business relationships.

Sanlam's policies are reviewed on an ongoing basis and, where necessary, will be updated to expressly refer to the anti-modern slavery obligations 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

We will review Sanlam UK's Outsourcing Policy and related due diligence processes and 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;
- 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.

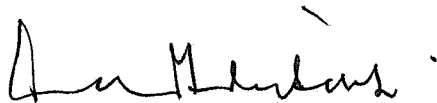
MONITORING

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 where appropriate.

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.

A handwritten signature in black ink, appearing to read 'A. M. ...', is positioned above the printed name of the Director.

Director
Sanlam UK Limited

Dated 12th May 2017