

CURTIS BANKS GROUP

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

JUNE 2018

This statement is made on behalf of Curtis Banks Group Plc (the “Group”) pursuant to section 54 (1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our modern slavery and human trafficking statement for the financial year ending December 2017.

We are committed to working to the highest professional standards and comply with all laws and regulations relevant to our business practices. We are committed to combatting modern slavery and human trafficking. We implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in any of our supply chains or within our own business practices.

Organisation’s structure

The Group is the UK-leading administrator and provider of self-invested pension products, principally SIPPs and SSASs, operating across the UK within the financial services sector. The Group has over 500 employees based across three offices in England and Scotland, with our head office located in Bristol.

The Group has a global annual turnover exceeding £36 million as at 31st December 2017. The Group includes Curtis Banks Limited, Suffolk Life Annuities Limited and Suffolk Life Pensions Limited and associated companies.

Our business

The Group and our business is organised into two key business units and trades under the names of:

- 1) Curtis Banks Limited (Company Registration Number: 06758825)
- 2) Suffolk Life Pensions Limited (Company Registration Number: 01180742)

Both businesses are authorised and regulated by the Financial Services Authority to provide trust-based SIPP products.

Suffolk Life Annuities Limited (“SLA”) (Company Registration Number: 01011674) is regulated by the Prudential Regulatory Authority and the Financial Conduct Authority to provide insurance-based SIPP products. SLA provides SIPPs through non-participating individual insurance contracts.

Our policies on modern slavery and human trafficking

We have in place an Anti-Slavery and Human Trafficking Policy, which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

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Our supply chains

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in modern slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Due diligence processes and supplier adherence for modern slavery and human trafficking

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of modern slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistle blowers.

We have a dedicated compliance team, which has support and involvement from the following departments:

- Legal;
- Human Resources; and
- Sales.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide compulsory training to all our staff ensuring that all staff support and implement our Anti-Slavery and Human Trafficking Policy effectively.