



MODERN SLAVERY STATEMENT FOR 2022 FINANCIAL YEAR

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (“the Act”) and sets out the measures that OneFamily is taking to ensure that modern slavery and/or human trafficking is not taking place within its business or supply chains.

This statement applies to Family Assurance Friendly Society Limited, Family Equity Plan Limited and Family Investment Management Limited (together “OneFamily”).

The business

OneFamily is a mutual financial services group offering retail savings, investments, life assurance, annuities and lifetime mortgage products to families across the UK. All of the business is conducted within the UK, although some customers may reside abroad.

OneFamily employed an average of c.535 full time equivalent employees during 2022. It operates from a head office in Brighton and from offices in Swindon and now Peterborough following the acquisition of BGL Direct Life Limited (trading as Beagle Street) on 30 November 2022. As employees have returned to the office during the year, we have introduced a hybrid working model to allow staff the flexibility to work remotely and in the office.

As an organisation OneFamily aims to pay salaries that meet or exceed the real living wage as set by the Living Wage Foundation.

Risks Identified

OneFamily’s supply chains are relatively simple and the nature of the goods and services procured provides only limited opportunities for modern slavery and/or human trafficking practices. OneFamily does not act as a producer, manufacturer or retailer of physical goods and has no supply chain in relation to such activities.

Our supply chains include:

- Office services including consumables such as paper and stationery, equipment and furniture
- Marketing and promotional literature and/or merchandise
- IT and electronics equipment and/or services and IT infrastructure
- Professional advisers

Policies

Given the nature of what OneFamily does as an organisation, it is considered that there is a low risk of modern slavery and/or human trafficking having a connection with its business activities. However, OneFamily has taken, amongst others, the steps detailed below to ensure compliance with the Act.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. *Recruitment policy.* OneFamily operates a robust recruitment policy and proper hiring procedures, including conducting eligibility to work in the UK checks, for all employees to safeguard against human trafficking or individuals being forced to work against their will. OneFamily is committed to ensuring that all directly employed and directly contracted employees receive fair remuneration for the job they perform.
2. *Whistleblowing policy.* OneFamily operates a whistleblowing policy so that all employees know that they can raise concerns about fair treatment of colleagues or practices within its business or the businesses of its suppliers, without fear of reprisals or repercussions.
3. *Procurement and outsourcing policies.* OneFamily implements a procurement standard which operates in conjunction with its contract review and outsourcing policies and which includes full due diligence checks on all material suppliers. A Third Party and Outsourcing Risk Policy is also in place.

Suppliers

OneFamily reviews its procurement processes and ongoing commercial management of material suppliers on a continual basis and has adapted its risk based assessment process to include a requirement to consider risks that could arise from modern slavery or human trafficking. The procurement process requires due diligence to be conducted on all new material suppliers before allowing them to become a supplier, this includes obtaining details of compliance with the Modern Slavery Act.

We have documented our current procurement requirements in respect of modern slavery as part of the annual review of the Third Party and Outsourcing Risk Policy, and have updated our procurement procedures to include a request for information about suppliers' policies with regard to paying the living wage.

Depending on the nature of their businesses, site visits to material suppliers are also carried out as part of initial and ongoing due diligence assessments.

Effectiveness

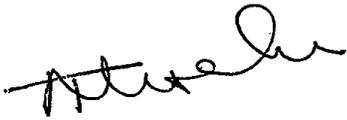
OneFamily will continue to monitor the effectiveness of the steps that it is taking to ensure that modern slavery and/or human trafficking is not taking place within its business or supply chains and will continue to adopt a proportionate and risk-based approach to reviewing these processes.

Further Developments Planned in 2023

In March 2023, our telesales partner, AMVOC, went into administration. OneFamily acted quickly to retain the talent and set up a new office in Leeds recruiting 20 former AMVOC employees and 3 more new members of staff.

Approval for this statement

This statement was approved by the Board of Directors on 21 June 2023.

A handwritten signature in black ink, appearing to read 'Teddy Nyahasha', written in a cursive style.

Teddy Nyahasha
Chief Executive Officer
OneFamily