



## **MODERN SLAVERY STATEMENT FOR 2016 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.

### The business

OneFamily is a mutual financial services organisation offering, itself and via its subsidiaries, 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 employs c. 600 staff and operates from a head office in Brighton and a branch office in central London.

### 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, equipment, furniture or consumable supplier
- Marketing and promotional literature and/or merchandise
- IT and electronics equipment and/or services

### Policies

Given the nature of what OneFamily does, 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 contracted staff 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 policy which operates in conjunction with its contract review and outsourcing policies and which includes full due diligence checks on all material suppliers.

#### Suppliers

OneFamily has undertaken a review of its procurement processes and has identified opportunities to embed both the assessment and reduction of risk of modern slavery and/or human trafficking in its supply chain into its operations. The procurement process now requires due diligence to be conducted on all new material suppliers before allowing them to become a supplier.

#### Effectiveness

OneFamily will 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.

#### Approval for this statement

This statement was approved by the Board of Directors on 27 April 2017.

Teddy Nyahasha  
Chief Finance Officer  
OneFamily

May 2017