Modern Slavery Statement

Introduction
This statement sets out XPS Pensions Group plc’s zero-tolerance stance to modern slavery and human trafficking in our organisation and our supply chain. This statement applies to all businesses within the XPS Pensions Group plc group of companies including third party suppliers with access to XPS Pensions Group or client property, systems or data and any other parties working on behalf of XPS Pensions Group. It relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

We strive to work to the highest professional standards to help ensure that we comply with all laws and regulations applicable to the organisation. Our suppliers are expected to follow the same high standards.

Our Business
XPS Pensions Group plc is listed on the London Stock Exchange Main Market and consists of several limited company subsidiaries. XPS Pensions Group is the largest pure pensions consultancy in the UK, specialising in pensions actuarial, investment consulting and administration.

The XPS Pensions Group business combines expertise, insight and technology to address the needs of both pension trustees and sponsoring companies for over 1,200 pension scheme clients and undertakes the administration for the pensions of over 800,000 scheme members.

We have over 1,000 employees based in 15 office locations across the UK.

Policy Statement
We are committed to ensuring that within our control there are no breaches appertaining to section 54 (1) of the Modern Slavery Act and we will not use or allow the use of forced or compulsory labour, slavery or human trafficking in the course of our business activities either in our business or in any part of our supply chain. This will be achieved by:

Equality and Diversity
We encourage a friendly, inclusive and supportive culture and we are committed to being a fair employer and upholding the legal and human rights of our employees.

Our policies and working practices promote equal opportunities and diversity and provide a safe working environment. These policies include:

- Equal opportunities and non-discrimination in the workplace, in recruitment, training and promotion irrespective of gender, age, religion or belief, disability, sexual orientation and employment status;
- Protection from harassment or intimidation;
- Flexible working and other family-friendly policies;
- Grievance and whistle-blowing practices and procedures;
- Health and Safety policy and procedures to ensure we provide a healthy working environment where we take all reasonable steps to prevent injury and illness to our employees, visitors and contractors.

We have a Diversity, Equality and Inclusion Working Group. The group is made up of representatives from each office and reports to the board of XPS Pensions Group plc. The group was set up to develop and improve policies and practices relating to diversity, equality and inclusion.

Corporate Responsibility
We have a Corporate Social Responsibility Working Group to ensure that the sustainable future of XPS Pensions Group is aligned with employee wellbeing, and XPS Pensions Group continuing to be an enjoyable place to work. We have appointed Mental Health First Aiders and work in partnership with the Mental Health Foundation.

Recruitment
We only use specified, reputable employment agencies and have standard terms and conditions of business with each agency. We also request and review a copy of the agency’s modern slavery statement. Our employment procedures also ensure that we conduct appropriate checks on all staff including verification of identity, ensuring they can legally work in the United Kingdom, references, evidence of qualifications, criminal and financial checks.

Remuneration
We are committed to ensuring all employees and workers receive fair remuneration for the job they perform. We do this by externally benchmarking our overall reward package and consider our total rewards package competitive. We continue to review this.
Modern Slavery Statement

Whistleblowing
We encourage all of our employees to report any concerns related to the activities of the business and have an external Whistle Blowing hotline to facilitate this. Our whistleblowing procedure is designed to ensure that any matter raised will be investigated thoroughly, promptly and confidentially. Employee induction training highlights our whistleblowing policy.

Training
We provide training to all new employees as part of their induction process and through annual internal communication reminders to all employees, to ensure proper understanding of the risks imposed by modern slavery and human trafficking, in the context of the firm’s business and supply chains. We ensure the training is completed.

Suppliers
We have a stable list of suppliers and existing suppliers. We have appointed an external company to liaise with our suppliers and confirm they effectively manage the risks concerning human trafficking and slavery within their own supply chains. We continue to review our supplier verification process to include checks on material new suppliers including their commitment and policies regarding the prevention of human trafficking and slavery and we will not award or renew business with any supplier who fails this test.

Given the nature of our business, we believe that the risk of modern slavery and human trafficking in our supply chain is low.

Our commitment
We will not use any business or organisation which is involved in this activity and will review and update this policy annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 31 March 2021.

Ben Bramhall
CEO