

Quilter

Modern Slavery Act

Introduction

In accordance with the requirements of section 54(1) of the Modern Slavery Act 2015 (the Act) this Statement sets out the steps we are taking to prevent modern slavery taking place within our business or supply chain. This Statement was published in June 2020 following approval by the Quilter plc Board¹. Previous Statements can be found online [here at quilter.com \(/responsible-business/governance-and-management/\)](https://www.quilter.com/responsible-business/governance-and-management/).

Together the Quilter group of companies² provide financial advice, investments and wealth management in the UK and selected international markets. Quilter plc is a leading wealth management business in the UK and internationally, helping to create prosperity for the generations of today and tomorrow. Quilter plc oversees £110.4 billion in customer investments (as at 31 December 2019).

Quilter listed on the London and Johannesburg stock exchanges in June 2018 and its financial year end is 31 December. Quilter plc is incorporated in England and it has subsidiaries in various jurisdictions. Details of our subsidiaries and the countries in which they are incorporated, as well as our businesses, are set out in our [Annual Report and Accounts 2019 \(/siteassets/quilter/investor-relations/reporting-centre/reports/quilter_ar_2019.pdf\)](https://www.quilter.com/siteassets/quilter/investor-relations/reporting-centre/reports/quilter_ar_2019.pdf).

Policies

We are committed to conducting business responsibly and upholding the highest standards of governance throughout our operations. Our Group Governance Manual sets out the policies, standards and processes by which the Group operates, and alongside this Statement, contains relevant policies such as our standards on human rights, supplier code of conduct, human resources, Code of Conduct, Responsible Business, and Third Party Risk Management. These policies can be found here online at [quilter.com \(/responsible-business/governance-and-management/\)](https://www.quilter.com/responsible-business/governance-and-management/).

Our approach to human rights covers not only our supply chains but also our employees and contractors. As such we are committed to paying the national living wage in the UK and expect our suppliers who provide onsite services to do the same. We use both our Code of Conduct and Whistleblowing Policy to train and empower our employees to escalate any concerns and ensure they are suitably managed.

Our supply chains

Quilter's supply chain provides a wide range of products and services. These range from professional advice and business services to more operational services such as cleaning, catering and facilities support. We aim to operate in an ethical manner and we expect the same of our suppliers.

We have aligned and standardised the procurement processes of all Quilter operating companies to our central third party risk management process. This has enabled us to include modern slavery due diligence uniformly across the Group. Our central supplier management process takes a risk-based approach and includes a risk assessment of new suppliers based on the nature and value of the product

or service being procured. As part of the vetting process, we require suppliers, in certain sectors or delivering certain services, to confirm that they have policies and training in place or follow standards designed to avoid slavery.

Our standard template supplier contracts, include express obligations to comply with applicable laws and a clause specifically requiring compliance with the Modern Slavery Act. Where existing contracts relating to the supply of products or services are deemed to be at higher risk of modern slavery, as part of the renewal process we will require the supplier to confirm its compliance with the Act.

Steps taken to date

Since 2018 we have undertaken several activities to identify risk in our supply chain, strengthen our response and train and engage our employees. Partnering with Risk subject matters experts has enabled us to take holistic approach to the identification and management of third party risk. Where a potential high risk of modern slavery is identified, these suppliers are prioritised for review. This review will include review of contract language, understanding a suppliers' policies and approach to modern slavery and communicating our Supplier Code of Conduct. As well as action with respect to our higher risk suppliers, where appropriate, we ensure our new contracts and any renewals have suitable wording to address the risk of slavery.

Going forward and building on the advances made, we are committed to implementing technology to industrialise the way we ensure these processes are followed and will greatly enhance our ability to report.

Internally, all colleagues are made aware of modern slavery through a compulsory annual training programme. One of our responsible business key performance indicators include colleague completion rates for the code of conduct. Our whistleblowing policy enables our colleagues to raise concerns should they arise, and we are ensuring that this approach is clearly communicated to all stakeholders.

We are committed to reviewing and updating our Modern Slavery statement, and our Supplier Code of Conduct annually.

Paul Feeney
Chief Executive, Quilter plc

¹ *This Statement has been approved by the Quilter plc Board of Directors and is made according to the requirements of Section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2019. This Statement applies to all companies within the Quilter group that are required to have a modern slavery statement..*

² *Quilter comprises several operating businesses: Quilter Financial Planning; Quilter Private Client Advisers; Quilter Financial Advisers; Quilter Investors; Quilter Cheviot; Quilter Wealth Solutions (which will be the new name for the Old Mutual Wealth UK Platform); Quilter International.*

[Download the Modern Slavery Act Statement 2019](#)

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Contact us

Senator House,
85 Queen Victoria Street,
London,
EC4V 4AB

Email: information@quilter.com