

Introduction from the Group CEO

It continues to be a priority for Neilson Financial Services Limited to ensure that we trade ethically, source responsibly and work to prevent slavery and human trafficking throughout our organisation and in our supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (Act) and highlights the key activities we have undertaken during this financial year to combat slavery and human trafficking in our organisation and supply chain.

Organisation's structure

We are a distributor of life insurance products in the financial services sector. We are a part of the Neilson group of companies (Group), and our ultimate parent company is The Neilson Group Ltd. The Neilson Group Ltd has its head office in the British Virgin Islands. The Group has over 500 employees worldwide and operates in Australia, Canada, the United Kingdom and the United States of America.

Our business

Our business is organised into several departments including our customer care and support teams, our sales team and our product team. Our business is supported by various business units which provide services to us and our Group more broadly. These business units comprise our core capabilities in areas such as marketing, business intelligence and actuarial services, and legal and compliance.

Our purpose and mission

Throughout 2024, we will continue to focus on our mission of making life insurance simple and accessible to everyone. As we grow and evolve, we will continue to invest in building a wide range of capabilities to ensure we have maximum flexibility and control over the design, development, and delivery of protection products for our customers.

Our supply chains

We have a base of suppliers who provide products and services for the Group and its customers. Our service providers are mostly based in the United Kingdom, but we do have providers in Australia, Canada, Ireland, New Zealand and the United States of America. The major suppliers to the Group are professional advisors and businesses within the media and marketing industry. We are committed to collaborating with these suppliers to play our part in the eradication of slavery and human trafficking.

Our policies and procedures on slavery and human trafficking

We have appropriate policies and procedures in place that underpin our commitment to ensure that there is no slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our policies and procedures reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As an equal opportunities employer, we are also committed to creating and ensuring a non-discriminatory and respectful working environment for our people. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK.

Due diligence processes for slavery and human trafficking

We assess the fitness of material suppliers to our Group on the basis of responses to due diligence questions and only partner with service providers who share our commitment to good governance. We take reasonable steps to ensure that all material suppliers to our group are engaged on the basis of a written agreement which requires compliance with all applicable laws and regulations.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking and ensure that our supply chain maintains the high standards that we set for ourselves. We demonstrate this by acting ethically and with integrity in all our business relationships, and by implementing and enforcing adequate and proportionate systems and controls.

Training

To ensure a high level of understanding of the risks of slavery and human trafficking in our supply chains and our business, we are in the process of rolling out training to our staff on the specific subject of slavery and human trafficking. All staff members are also encouraged to identify and report any potential breaches of the Act or suspicions of slavery and human trafficking within our business and its supply chain. We also operate a whistleblowing policy and we are committed to treating all concerns raised in accordance with our whistleblowing policy with utmost confidentiality.

Our ongoing commitment

Our effort to combat slavery and human trafficking in our organisation and supply chain is ongoing and constantly evolving. We recognise the need to regularly review our policies, processes and procedures, including staff training, to ensure that ensure that awareness of

slavery and human trafficking is effectively embedded within our organisation in accordance with the Act and best practice.

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 2023. It was approved by the board of The Neilson Group Ltd on 23 May 2024.

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Gavin Donnelly
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Gavin Donnelly

Group CEO

23 May 2024