



**Modern Slavery and
Human Trafficking
Statement
September 2024**

Pure Retirement Ltd Modern Slavery Statement September 2024

This statement outlines our zero-tolerance approach to modern slavery and human trafficking practices in our business operations. This statement is made in accordance with the United Kingdom (UK) Modern Slavery Act in our capacity as a commercial organisation that carries on business and supplies services in the UK. This statement relates to the financial year April 2023 to April 2024

As a regulated financial services provider operating with suppliers within the jurisdiction of the United Kingdom, we have a low exposure to the risk of modern slavery and human trafficking however we are committed to the ongoing identification and prevention of Modern Slavery practices within our business. We will aim to review this statement at least annually.

Definition of Modern Slavery and Human Trafficking

- Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.
- Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

Modern slavery is a crime and a violation of fundamental human rights.

Our approach

Pure Retirement Ltd strictly prohibits the use of modern slavery and human trafficking in our operations. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our business. We require our business partners to hold their own affiliates to the same high standard.

We have a zero-tolerance approach to modern slavery in our organisation and in the organisations of all those working for/with us. This approach applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

Whilst we consider our exposure to modern slavery risk as low, we are committed to the identification and prevention of Modern Slavery practices.

Our organisation and supply chain

Pure Retirement Ltd is a specialist Lifetime Mortgage Provider within the UK Financial Sector. We are regulated by the Financial Conduct Authority under registration number. Our supply chain includes:

- Office facilities management (e.g., maintenance and upkeep)
- Stationery and document providers
- Telephony and IT services
- Professional services (including financial intermediary firms)
- Funding Partners

As part of our Terms of Business, our supply, outsourcing and third-party business affiliates are subject to the provisions of the Modern Slavery Act.

Action we have taken: Policy and Due Diligence

We have policies and procedures in place to mitigate residual risk including, but not limited to:

- Pure Retirement's Handbook and Code of Conduct which outlines our expectations that employees will conduct themselves with integrity and honesty at all times.
- Grievance procedure which provides a mechanism for complaints and disputes to be formally raised in compliance with equal opportunities principles.
- Whistleblowing policy and procedure to enable confidential reporting of concerns for investigation without fear of retaliation. This may include:
 - (a) Criminal activity, including bribery or fraud.
 - (b) Failure to comply with any legal obligation.
 - (c) Failure to comply with any professional obligation or regulatory requirement.
 - (d) Miscarriages of justice.
 - (e) Danger to health and safety.
 - (f) Damage to the environment.
 - (g) Breach of our internal policies and procedures.
 - (h) Conduct likely to cause damage to our reputation or financial wellbeing.
 - (i) Unauthorised disclosure of financial information.
 - (j) Serious negligence.
 - (k) The deliberate concealment of any of the above matters

All reports are fully investigated, and appropriate action will be taken.

- Suspicious activity reporting procedures and monitoring controls.
- Financial crime prevention policies, training and assurance activities
- Hiring and recruitment policies that are compliant with UK legislation and our company values.

- Due diligence and audit. We have established due diligence procedures for the provision of our supply, outsourcing and third-party business activity.

Pure Retirement's commitment

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of our zero-tolerance approach.
- We are committed to engaging with our stakeholders and third parties to address the risk of modern slavery in our operations.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Consistent with our risk-based approach we may require employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of third parties for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

This statement has been reviewed and approved by the Director of Compliance on 17th September 2024.

Paul Carter

CEO, Pure Retirement
September 2024