



**Modern Slavery and
Human Trafficking
Statement
September 2023**

Pure Retirement Ltd Modern Slavery Statement September 2023

This statement outlines our zero-tolerance approach to modern slavery and human trafficking practices in our business operations. As a regulated financial services provider operating with suppliers within the jurisdiction of the United Kingdom, we have 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.

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 low, we are committed to identifying and preventing Modern Slavery practices. We have policies and procedures in place to mitigate residual risk, including Pure Retirement's Handbook containing a grievance procedure, whistleblowing procedure and suspicious activity reporting. All reports are fully investigated, and appropriate action will be taken.

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.

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.
- Consistency 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 08 September 2023

Paul Carter

CEO, Pure Retirement
September 2023