

# Quilter plc Modern Slavery Act Statement 2022

## 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 May 2022 following approval by the Quilter plc Board<sup>1</sup>. Previous Statements can be found online [here at quilter.com](https://www.quilter.com/modern-slavery-statement/).

Quilter plc is a leading wealth management business, helping to create prosperity for the generations of today and tomorrow. The Quilter group of companies<sup>2</sup> has an adviser and customer offering spanning financial advice, investment platforms, multi-asset investment solutions and discretionary fund management. Quilter plc oversees £107.2 billion in customer investments (as at 31 March 2022).

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 2021](#).

## 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](https://www.quilter.com).

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.

Our end-to-end business spend technology, Coupa, integrates risk assessment throughout procurement and supply chain management processes, and significantly enhances our ability to identify, monitor and address modern slavery and human trafficking risks.

In the financial year ending 31 December 2021 all colleagues were made aware of modern slavery through a compulsory annual training programme. Completion of this training is a key performance indicator of our management of modern slavery risk and 99% of our colleagues completed the training in 2021. 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.

Going forward, our on-going priority is to engage with key suppliers to enable collaboration and sharing of best practice on the prevention of modern slavery.

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

<sup>1</sup> 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 2021. This Statement applies to all companies within the Quilter group that are required to have a modern slavery statement.

<sup>2</sup> Quilter plc group comprises two segments: 'Affluent' and 'High Net Worth'. The Affluent segment comprises the following operating businesses: Quilter Financial Planning, the Quilter Investment platform and Quilter Investors. The High Net Worth segment comprises the following operating businesses: Quilter Cheviot, together with Quilter Private Client Advisers.



**Paul Feeney**  
Chief Executive, Quilter plc