

# Modern Slavery Statement

---

Rothesay Life is a leading provider of bulk annuities and other de-risking solutions for defined benefit pension schemes and insurance companies. We therefore understand the importance of ensuring that the highest professional standards are met at all times.

As required by the Modern Slavery Act 2015 (the “Act”), this statement describes the steps which Rothesay Life takes to ensure that slavery and human trafficking is not taking place in any part of our business or in any of our supply chains.

## Scope

This statement covers Rothesay Holdco UK Limited and its subsidiaries, Rothesay Life Plc and Rothesay Pensions Management Limited and is applicable from our financial year end, 31 December 2019.

## Our business and supply chains

Rothesay Life is primarily located in and operates from London. Our business model involves core internal operations supported by services provided by a number of trusted third party providers.

## Our suppliers

Our key suppliers and business partners provide services in the following areas:

- Technology services
- Pensions administration services
- Middle office operations
- Premises management, such as cleaning and security

We closely monitor the performance of our suppliers through regular meetings with them and on-site reviews. The management of suppliers is overseen by an internal committee, which has stated terms of reference. These terms include the formal review of our critical suppliers at least annually and this process includes a requirement on them to confirm their commitment to ensuring their business is free of slavery. The terms of reference also ensure that all new suppliers are fully checked against our onboarding criteria which include the need to have a Modern Slavery Statement where applicable.

We strive to foster long-term relationships with our critical suppliers and we avoid making demands of our suppliers that might lead to them violating human rights.

The supply chains supporting Rothesay Life are diverse in both category and location. However we believe that the risk of slavery and human trafficking in our business and supply chains is low. We expect our suppliers to have robust processes to ensure compliance with the Modern Slavery Act 2015 and to ensure fair employment practices and we work with our closest partners to promote best practice. For example, we require our cleaning suppliers to pay their personnel, who work at our premises, a salary which is equivalent (at least) to the London Living Wage.

## Our training

All new employees are educated on the Modern Slavery Act and they are made aware of the important role that they play in identifying signs of breaches of the Act within our employee base and within our suppliers. Employees are actively encouraged to report their concerns either internally or via our whistleblowing policy.

Our aim is to raise awareness of the issues and increase informed scrutiny. We are committed to ensuring awareness of the Modern Slavery Act across the business as part of our efforts to help eliminate all forms of compulsory labour and human trafficking.

This statement was approved by the Board of Rothesay Life Plc on 14<sup>th</sup> May 2020.

Signed:



Andrew Stoker  
Chief Financial Officer  
25<sup>th</sup> September 2020