

Modern Slavery and Human Trafficking Statement

Introduction

This statement comprises of both Forester Holdings (Europe) Limited and Forester Life Limited companies, herein referred to as Foresters Financial UK. It is made in accordance with section 54 of the Modern Slavery Act 2015. It sets out our approach to mitigate the risks of modern slavery in our business and supply chains during the financial year ended 31 December 2016.

Our Modern Slavery and Human Trafficking Policy

We are committed to ensuring that there is no modern slavery or human trafficking in our business or supply chains. At Foresters Financial UK we take our obligation to conduct business in a highly professional and ethical manner very seriously. We operate our business with the upmost integrity and comply with legislation and regulations applicable to our business. Our Code of Ethics sets out our working relationships and standards with our employees, partners, suppliers, customers and communities.

Company policies and procedures demonstrate our commitment to corporate social responsibility and reducing the risks of modern slavery and human trafficking. We exist solely to enrich the lives of our members and customers, their families and the communities where they live.

Any internal breach or suspicion of breach, of the Modern Slavery Act will be managed in accordance with the Company's formal procedures.

Any suspicion of a breach within our supply chains is investigated and our approach would be to encourage any such company to comply with the law.

Foresters Financial UK may discipline and/or terminate the employment or its relationship with any director, officer, employee, representative, independent contractor, or suppliers who breach our Code of Ethics.

Organisational Structure and Supply Chains

The companies that make up Foresters Financial UK are subsidiaries of the Independent Order of Foresters, a fraternal benefit society incorporated in Canada with branch and subsidiary operations in the US, Canada and the UK and is a mutual organisation owned by its members. Forester Holdings (Europe) Limited is the ultimate holding company in the UK and holds UK fixed assets and provides UK group administration support. Forester Life provides stakeholder savings and investment, pension and protection products to UK customers which are available via a home based personal financial planning service as well online direct to customers.

Foresters Financial UK employs approximately 330 staff, 50% based at our UK headquarters in Foresters House, Bromley and 50% home based as part of our UK network of financial advisers.

In 2016 Foresters Financial UK worked with over 280 suppliers across various sectors including Financial Services, Information Technology, Marketing, Legal and Regulatory bodies, Facilities management, Utilities, Transport, Healthcare and Education.

We are also in partnership with asset management companies, software solution providers and professional consultants.

Risk Assessment

We have assessed that there is a low risk of slavery and human trafficking in our business and supply chains due to the nature of our business and supply chains.

In 2016 Foresters assessed both our internal business practices and our supply chains.

Foresters Company policies and procedures were reviewed and deemed compliant with the Modern Slavery Act.

Following a risk based approach of assessing our supply chains in 2016, Foresters plans to contact higher risk supplier groups in 2017 to gain comfort that slavery and human trafficking does not exist within their businesses.

Our Policies and Procedures

Policies reviewed in 2016 include Code of Ethics, Grievance, Harassment, Health and Safety, Recruitment and Whistleblowing.

Our Code of Ethics applies to all directors, officers, employees, representatives, contract employees, independent contractors, and gives guidance on how to choose suppliers fairly. The Code of Ethics has guiding principles which include conducting ourselves with the highest standards of professionalism, honesty, fairness and respect for others as well to uphold and fully comply with all laws, regulations, and policies governing business conduct.

Our Health and Safety policy ensures that all employees, contractors and workers have a safe working environment. All employees have access to a free and confidential Employee Assistance Programme which provides employees and their families with information, advice and counselling covering a variety of personal, family or workplace issues.

Our Whistleblowing policy explains how a worker can make a disclosure confidentially should they experience or observe any action or behaviour which they believe to be unlawful, breach of regulations or in conflict with our Code of Ethics.

Our Recruitment policy ensures all employees are employed on contracts that are compliant with employment law including payment of wages and benefits and the working time regulations. There are no compulsory overtime clauses in any contractual terms and conditions.

Our policies already reflect the aims and principles of the Modern Slavery Act. In 2017 relevant policies will be amended to expressly reference our commitment to comply with

this Act. We will continuously review our business practices to ensure there is no modern slavery or human trafficking within our business or supply chains.

Training

In 2016 management and employee training was designed and planned. Mandatory online awareness training will be delivered in 2017 and included within the Company's induction programme.

Additional training will be provided to those individuals responsible for engaging our suppliers and partners to ensure modern slavery is considered during the due diligence process.

Key Performance Indicators

1. 100% employee completion of the online training during the Company induction
2. Number of disclosures made under the Whistleblowing policy related to the Modern Slavery Act
3. Number of grievances raised related to the Modern Slavery Act
4. No employees paid less than that allowable by law
5. Using a risk based approach, an annual review of suppliers to monitor that our supply chains remains a low risk

This statement has been approved and authorised by the Board of Directors and is signed by Euan Allison, Chief Executive Officer on behalf of Foresters Financial UK.

Signature: 

Euan Allison, Chief Executive Officer

Forester Holdings (Europe) Limited

Forester Life Limited

Dated: 1st August 2017