

# **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 2025.

## **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 environmental, social and governance issues and sustainability including 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 expect any such company to comply with the law. We would work closely with the supplier to address and remediate any issue, and where this cannot be resolved, we may terminate the contract.

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 personal financial advice service as well as online direct to customers.

Foresters Financial UK employs approximately 400 staff, approximately half based at our UK headquarters in Foresters House, Bromley and half home based as part of our UK network of financial advisers.

Foresters Financial UK works with hundreds of suppliers across various sectors including Financial Services, Information Technology, Marketing, Legal and Regulatory bodies, Facilities management, Utilities, Transport, Healthcare and Education.

We also work with asset management companies, software solution providers and professional consultants.

### **Risk Assessment**

Foresters has assessed both our internal business practices and our supply chains regarding the Modern Slavery Act.

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. We have a small and directly employed employee base and have limited reliance on high-risk labour-intensive supply chains.

### **Our Policies and Procedures**

Policies reviewed 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 Procurement policy sets out a number of clauses relating to modern slavery to be included in all contracts, as well as further potential clauses to be included depending on risk or size.

### **Training**

Modern slavery training is included in the online induction courses for new hires to complete, with colleagues undergoing a refresher at least every two years.

In addition, we reference Modern Slavery in our in-person induction.

## Suppliers

In addition to the modern slavery requirements in the procurement policy, we review the modern slavery approaches of our largest suppliers and selected higher risk suppliers on an annual basis. Suppliers without a public modern slavery approach are required to confirm that the reporting requirements of the UK Modern Slavery Act 2015 Transparency In Supply Chains Section 54 does not apply (due to turnover less than £36 million etc) and explain their approach to eradicating modern slavery risks in their operations and supply chain.

In 2025, we expanded our supplier review, focusing on higher risk sectors. We contacted suppliers where a modern slavery statement was not publicly available. Five instances were raised, which were all resolved satisfactorily.

## Key Performance Indicators

The following Key Performance Indicators are reviewed annually by the Audit and Compliance Committee:

1. Completion rate of standalone modern slavery training  
*100% completion rate*
2. Number of disclosures made under the Whistleblowing policy related to the Modern Slavery Act  
*No disclosures were made under the Whistleblowing policy related to the Modern Slavery Act*
3. Number of grievances raised related to the Modern Slavery Act  
*No grievances were raised related to the Modern Slavery Act*
4. No employees paid less than that allowable by law  
*No employees were paid less than the National Living Wage (NLW) allowable by law.*
5. Number of instances Foresters raised modern slavery with suppliers  
*Five instances raised, which were all resolved satisfactorily.*

This statement has been approved by the Board of Forester Holdings (Europe) Limited (FHEL) and Forester Life Limited (FLL) on 30 April 2026 and has been signed on its behalf by Nici Audhlam-Gardiner, Chief Executive Officer, Foresters Financial UK.

Signature:



Nici Audhlam-Gardiner, Chief Executive Officer

Created April 2026