



LV= Modern Slavery Statement

For the year ended 31 December 2021

Purpose of this Statement

This statement is made pursuant to section 54 of the Modern Slavery Act (the “Act”). The Act defines modern slavery as “slavery, servitude, and forced or compulsory labour” as well as “human trafficking” (“modern slavery”).

This statement sets out the approach and steps taken by Liverpool Victoria Financial Services Limited (“LVFS” or “LV=”) to ensure that modern slavery is not taking place in any part of our business or supply chains. The statement applies to LVFS only as, for year-ended 2021, none of the group’s subsidiaries met the legal reporting thresholds required by the Act.

About LV=

We are a leading UK financial services provider offering protection, savings and retirement products and solutions. We work with a wide range of financial advisors and it is through them that the majority of customers will buy our products and services. We believe that everyone should have access to independent, regulated financial advice and it should not be seen as a luxury for the few who can afford it or who are experienced in using it. Our 1,300 people help our customers protect their income whilst they are working and maximise it when they stop.

In 2021 we asked our members to approve our proposals to sell the LV= life and pensions business to Bain Capital. The results of the member votes were insufficient for us to go ahead with our original proposals. We have therefore begun to evaluate how we can secure the long-term future for LV= and the alternative options that are available to us in order to achieve this. We have, and will continue to listen to members' views, in any conclusions that we reach.

LVFS is the group’s ultimate parent company and has direct and indirect ownership of 31 subsidiaries. To view LV=’s organisational structure as at 1 March 2022, please click [here](#).

Progress made in 2021

We have zero tolerance to slavery and human trafficking and have continued to consider ways to minimise the risk of modern slavery in our business and our supply chain throughout 2021.

2021 continued to be affected by the Covid-19 pandemic. Throughout the year, our focus was to continue to ensure that our customers and members remained supported and at the heart of what we do, and that our people were safe and able to work from home.

Our ‘Stay Connected’ internal campaign, launched in 2020, has continued to help keep our people connected to one another and supports their wellbeing throughout another turbulent year.

We have been fortunate that we never had to close our phone lines to our customers and members, and that none of our employees were furloughed at any stage. Our critical and important suppliers continued to be monitored on a daily basis to ensure that they were still providing a service in line with service level agreements and we were not at risk of service disruption for our customers and members.

Our Values and Policies

The following policies support us in meeting our modern slavery responsibilities:

[Third Party Code of Conduct and Ethical Standards](#)



Our Third Party Code of Conduct and Ethical Standards is part of our suite of standards which are built into our third party due diligence process. The Code of Conduct outlines our expectations and requests that all third parties that we engage with attest to our minimum requirements including:

- Not to use forced, bonded, compulsory or trafficked labour and not to hold anyone in slavery or servitude, whether adults or children.
- To allow workers to leave their jobs after giving reasonable notice.
- Not to make workers' pay to secure their jobs.
- To apply these standards to their own organisation and supply chains.

Speak Up policy

Our Speak Up policy helps encourage high ethical standards throughout the business and ensures that there is a procedure in place for employees to raise concerns confidentially and outside of the standard management and human resources channels.

Employee Relations and HR Policies

Our **Human Rights policy** confirms our commitment to upholding the standards set out in the United Nations ("UN")'s Universal Declaration of Human Rights, the International Labour Organisation ("ILO")'s Standards and the Human Rights Act 1998, amongst others. We consider that the most relevant human rights to our business are the right to just and favourable working conditions, the right to be free from discrimination, protection of minorities and the right to be free from compulsory labour.

Our **Employee Assistance Programme** offers a confidential advice service for our employees provided by an independent agency. It provides supports for our people who are experiencing any issues or problems including mental, physical and financial health. This ensures that our staff have an independent resource to use if they want to raise any personal concerns.

We have robust **recruitment processes** and carry out criminal record, fraud and financial checks on every potential candidate (and enhanced checks on senior staff where appropriate) before they start in the business. We also carry out strict right to work checks in line with Home Office guidelines as part of our on boarding process.

For our temporary and contractor population, we comply with the **Agency Workers Regulations** (AWR) and ensure that we give equal treatment in respect of basic working rights and conditions; the same access to employment opportunities within the workplace and after 12 weeks the right to equal pay, bonus and holidays.

All of which give current and prospective employees fair and equal treatment and avenues to pursue if they want to raise any personal or confidential concerns.

Our supply chains

Our supply chain is built around supporting our core functions and business areas and includes legal and claims services, business process outsourcing, marketing, facilities management and property, HR and professional services.

Due Diligence and Risk Assessment

At LV=, our work on modern slavery is part of our wider approach to risk management and delivering on our ethical and responsible values. As a financial services organisation, we continually assess and consider the risk of modern slavery and currently deem the risk to be low. However, we respect and acknowledge that modern slavery is a global issue and that no economy, industry or sector is exempt and we are fully committed to complying with the objectives of the Act.

We continue to operate systems and appropriate measures to help mitigate risk, ensuring that we are prepared and vigilant against any situations that may arise. This includes the on-going due diligence and oversight of our supply chain. We use a third party model, Financial Services Qualification



System (FSQS) operated by Hellios Information Limited as part of our due diligence process. FSQS is an intuitive automated due diligence and policy compliance system which collects, validates and shares third party compliance data. The FSQS issues dynamic and intuitive risk based questionnaires appropriate to the service being provided and its related risks. This contains multiple risk areas and includes a bespoke modern slavery assessment. FSQS is also utilised by numerous other financial institutions, which ensures that we operate a consistent approach.

It is important to us that all suppliers represent LV= in a manner that reflects our values. Our standard contract terms and conditions and our Code of Conduct & Ethical Standards include a specific clause that expressly prohibits the use of modern slavery. All of our suppliers are expected to comply with the standards outlined in the Code.

Training

We are committed to ensuring that employees throughout the business, particularly the Sourcing and Human Resources teams, have the knowledge and understanding of the Modern Slavery Act in order to properly discharge the legal and ethical responsibilities we must comply with.

Our Commitment for 2022

We acknowledge that the duty to mitigate against the risk of modern slavery occurring in our supply chain is an on-going responsibility.

We will continue to review our processes and training to make sure that we are doing everything we can to detect, prevent and promote awareness of modern slavery across the business and our supply chain.

Approval and Signature

This Statement has been approved by the Board of Liverpool Victoria Financial Services Limited, as the only group entity which falls within the scope of the Act.

A handwritten signature in black ink, appearing to read 'Seamus Creedon', written over a horizontal line.

Seamus Creedon

Interim Chair
Liverpool Victoria Financial Services Limited



Appendix

Other LV= entities not within scope of section 54(2), but nonetheless, are subject to and comply with the Modern Slavery Act and LV='s modern slavery policies and practices.

- Frizzell Financial Services Limited
- Liverpool Victoria Financial Advice Services Limited
- Liverpool Victoria Life Company Limited
- LV Capital Limited
- LV Commercial Mortgages Limited
- LV Equity Release Limited
- LV Life Services Limited
- LV Protection Limited
- NM Pension Trustees Limited
- Teachers Assurance Company Limited
- Teachers Financial Services Limited
- Teachers Management Services Limited