

# Mobius Life Slavery & Human Trafficking Statement

## Introduction

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. As an ethical organisation we have no appetite to accept non-compliance with our legal and regulatory obligations. We have no wish to trade with, support or work with any business which is involved in slavery or human trafficking in any way, however remotely or indirectly.

## Our Business

The Mobius Life Group is made up of a number of firms operating from Gresham Street, London and provides Pension scheme asset administration services to Trustees of UK pension schemes, Consultants and advisers, Asset Managers and Life Insurance Companies in the UK market. A list of the types of clients that this statement applies to can be found on our website [www.mobiuslife.co.uk](http://www.mobiuslife.co.uk) under the 'About Us' tab. By references to "Mobius Life", "we", "us" and "our" we mean Mobius Life Group Ltd and the firms that form the Mobius Life group of companies.

We have a zero-tolerance approach to modern slavery of any kind within our operations and are committed to taking all reasonable steps to ensure that there is no modern slavery or human trafficking in our business or supply chains.

We do not consider ourselves to be operating in an environment with a high risk of modern-day slavery for the following reasons:

- We operate only in the United Kingdom and the clients we provide services to are located only in the UK;
- The Trustee Investment Policy (TIP) is only available through UK based professional Consultants, Actuaries and Advisers who must be authorised and regulated by the Prudential Regulatory Authority (PRA), the Financial Conduct Authority (FCA) or the Institute and Faculty of Actuaries (IFoA) (or a combination);
- Customer identification (KYC) is undertaken & declared by these consultants and advisers as per the Joint Money Laundering Steering Group (JMLSG) Guidance;
- Clients are represented and advised by an independent adviser when first taking out the TIP;
- We use a relatively small number of suppliers to support our business almost all of whom are based in and operate in the UK. One supplier, specifically FRS our Asset Administration system (InvestPro) provider is based in the Republic of Ireland. We have appropriate contracts for service in place and have not identified any evidence to believe that slavery or human trafficking exists here.

We have policies in place which cover matters including (but not limited to) the prevention of financial crime and which refer to Slavery & Human Trafficking. These are made available to relevant staff who are required to confirm they have read and understood the policy.

## Supply Chain Risk

We source goods and services from a relatively small number of suppliers covering:

- I.T. including telephony & equipment;
- Office accommodation & supplies;
- Legal services;
- Property services;
- Actuarial services;
- Internal Audit services.

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Our Outsourcing & Contracts policy sets out the approach we will take to the selection of key suppliers. We will have regard for suppliers:

- Reputation and history;
- Knowledge and experience;
- Quality of services provided to us where for example we are renewing existing or entering new or additional arrangements;
- Quality of services provided to other customers we are aware of;
- Legal and regulatory standards, such as any history of prosecution, enforcement action or similar;
- Financial stability and commercial record.

Any contracts we enter into will make clear all parties must comply with applicable laws and regulations. Key contracts will be reviewed by our Compliance & Risk function, and, if necessary, by external professionals. Our Operations function monitors on-going performance of our key suppliers.

## People Risk

In terms of recruitment, we verify the identity, address history and right to work in the UK of all new candidates for employment. As part of this, we undertake background screening and the appropriate level Disclosure Barring Service (DBS) check. This screening activity can be repeated at intervals. It is policy to only pay salaries into an account in the name of the employee. We do not place particular reliance on the use of temporary agency staff. Where such staff are engaged, confirmation from the agency they have undertaken appropriate background checks on the candidate is sought.

## Awareness

The Company provides awareness of modern slavery issues as deemed appropriate for a business of our size and type. The Company operates appropriate policies and procedures for identifying, preventing and reporting slavery and human trafficking including Whistleblowing Policy, Equal Opportunities Policy and Health and Safety Policy. The business reviews its risks at least annually. The result of our most recent assessment did not identify any concerns.

## Responsibilities

Our board of directors has overall responsibility for the approval of key policies relating to financial crime prevention and this Slavery & Human Trafficking Statement.

## Conclusions

Taking all the above into account, we consider the business operates in a very low risk environment and continues to meet the requirements of the Modern Slavery Act 2015. Furthermore, through our processes and procedures, we have not identified any reason to believe that slavery or human trafficking affects any part of our business either directly or via those suppliers we are engaged with.

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our Slavery & Human Trafficking Statement for the financial year ending 31<sup>st</sup> March 2022. It has been reviewed and approved by our board on 9<sup>th</sup> March 2022.

*Adrian Swales*  
*Chief Executive*  
*Date: 09/03/2022*