

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and Human Trafficking (the "Act") and has been adopted by the Phoenix Group and all its subsidiaries as our statement on slavery and human trafficking for the financial year ending 31 December 2017.

Phoenix Group is committed to combatting all forms of modern slavery and carrying out our business in a fair, honest, ethical and open manner. This modern slavery and human trafficking statement (the "Statement") sets out Phoenix Group's actions to understand all potential modern slavery and human trafficking risks related to its business and our approach for ensuring that we have effective systems and controls implemented to prevent these risks from occurring in our business and/or in our supply chains.

For 2018 we have reviewed our business and supply chain in the light of our commitment to address any forms of modern slavery and human trafficking occurring in our supply chain, and this has resulted in the update of our Sourcing & Procurement Policy.

Phoenix Group Structure and Supply Chain

Given the nature of Phoenix Group's business, the risk of modern slavery in our supply chain is considered low, however this assessment does not give rise to complacency. The Phoenix Group operates a highly outsourced operating model and as such our policies are targeted at the prevention of modern slavery in our own business as well as our supply chain.

Our Policies

Our policies reflect our commitments to pay employees fairly and properly for their work, act with integrity and ethically in our business relationships and enforce effective systems and controls across our supply chains.

Our employees are subject to, and benefit from, a wide range of policies including, disciplinary, grievance, non-discrimination, remuneration and numerous compliance policies. The policies and frameworks that we have in place limit the risk of modern slavery and human trafficking in the workplace and encourage all staff to work and act ethically.

We also operate a whistleblowing policy that enables anyone to raise any concerns.

Our Sourcing and Procurement Policy also ensures that all our suppliers can demonstrate they are adhering to the requirements of the Modern Slavery Act. Where this is not the case, an appropriate remedy will be sought commensurate to that suppliers criticality to the business.

Due Diligence

Due Diligence guidelines include the requirement for modern slavery adherence to be assessed prior to appointing suppliers who support delivery of core services.

Risks, Controls and Effectiveness

As the Group operates a largely outsourced operating model, the risk of supplier non-compliance with the Modern Slavery Act 2015 is a key area of focus. As a part of the Groups Sourcing and Procurement Policy, Phoenix will identify any supplier that supports delivery of core services and review their adherence to the Modern Slavery Act via their own websites (or by other means as appropriate) on an annual basis. All members of staff are required to attest that they will operate in adherence with the Sourcing and Procurement policy on an annual basis and raise any concerns they may have. To date, no instances of modern slavery or any associated concerns have been identified.

Continuous Improvement

We are never complacent. We will continually review and refresh our risks and assessments in relation to modern slavery and human trafficking as part of our established risk universe; both as an employer and a purchaser of goods and services.

Annual Review

The Phoenix Group will continue to conduct an annual review of this Statement and the actions it takes to combat all forms of modern slavery internally and within its supply chain.



Clive Bannister

Group Chief Executive Officer
Phoenix Group