

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Xafinity's zero-tolerance stance on modern slavery and human trafficking in our organisation and in our supply chain. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

We strive to work to the highest professional standards to help ensure that we comply with all laws and regulations applicable to the organisation. Our suppliers are expected to follow the same high standards.

Our Business

Xafinity is a market leading actuarial, pensions and employee benefit consultancy providing a full range of consulting and administration services to over 500 clients. We combine expertise, insight and technology to address the needs of both trustees and companies, specialising in pension de-risking solutions.

Xafinity has been providing professional services for almost 40 years, and strives to be the provider of choice in pensions and employee benefit services. We are committed to providing a professional service, tailored to our clients' needs and delivered cost effectively.

We have over 400 employees within six offices across the UK .

Policy Statement

We are committed to ensuring that within our control there are no breaches appertaining to section 54 (1) of the Modern Slavery Act and we will not use or allow the use of forced, compulsory labour, slavery or human trafficking in the course of our business activities either in our supply chain or in any part of our business. This will be achieved by:

Recruitment

Our employment procedures ensure that we conduct appropriate checks on all staff to ensure they can legally work in the United Kingdom.

Remuneration

We are committed to ensuring all employees and workers receive fair remuneration for the job they perform.

Whistleblowing

We encourage all of our employees to report any concerns related to the activities of the firm. The firm's whistleblowing procedure is designed to ensure any matter raised will be investigated thoroughly, promptly and confidentially. All employees carry out an annual compliance refresher training course which reminds them of our whistleblowing policy.

Training

In order to ensure proper understanding of the risks imposed by modern slavery and human trafficking in the context of the firm's business and supply chains, we will be providing training to all new employees as part of their induction process and through annual internal communication reminders to all employees.

Suppliers

We have a stable list of suppliers and existing suppliers are contacted to confirm their positions with regard to human trafficking and slavery. We are reviewing our supplier verification process to include checks on material new suppliers including their commitment and policies regarding the prevention of human trafficking and slavery and we will not award or renew business with any supplier who fails this test.

Given that we are a service based actuarial, pensions and employee benefit consultancy business, we believe that the risk of modern slavery and human trafficking in our supply chain is low.

Our commitment

We will not use any business or organisation which is involved in this activity and will review and update this policy annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2018.



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Ben Bramhall
Co-CEO