

Wiltshire Friendly Society Limited seeks to ensure that any instance of modern slavery or human trafficking does not occur in our operations, within our suppliers or our intermediary distribution partner network.

This statement sets out the steps we are taking to ensure modern slavery is not taking place within our business or supply chains.

We operate in alignment with our corporate values, operating ethically, with transparency and honesty to serve our members. Our systems, controls, recruitment, people management, procurement and risk management follow robust processes in adherence with our regulators, the Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA).

As per Section 54, Part 6 of the Modern Slavery Act 2015, we set out below how we anticipate, avoid and manage any potential occurrences of Modern Slavery, following the Home Office's statutory guidance:

1. Organisation structure and supply chains

We are a registered Friendly Society, incorporated under the Friendly Societies Act 1992, authorised by the PRA and regulated by both the FCA and PRA.

We provide income replacement plans to individuals, employers for the benefit of their employees and amateur, semi-professional and professional sports players. Our products are distributed by regulated financial services intermediaries.

We are located in Trowbridge, Wiltshire, and all our operations are within the UK.

We are a member of the Association of Financial Mutuals (AFM). As a mutual, the Society is owned by our members and operates for their benefit. Established in 1887, Wiltshire Friendly currently has 3,695 memberships and assets of over £13.5 million (December 2022).

We employ 11 staff, all based in our office in Trowbridge, Wiltshire. It is a relatively flat structure; the Chief Executive has a management team of three individuals. The rest of the staff report directly or indirectly into the Chief Operating Officer.

We operate a simple supply chain of goods, services, and third-party suppliers; with intermediaries, office goods suppliers, IT suppliers, cleaning providers and professional services provider. We do not knowingly do business with suppliers that do not comply with the Modern Slavery Act, 2015.

2. Policies in relation to slavery and human trafficking

We will ensure our relevant policies and procedures adhere to the Modern Slavery Act, 2015, such as our recruitment policy and whistleblowing policy.

Our Chief Executive ensures all policies and procedures are in place and adhered to.

Our Board of Non-executive Directors oversees this as part of our Environmental, Social & Governance (ESG) responsibilities.

3. Due diligence processes

As part of our due diligence, we will review and take action to ensure our supply chains and partners adhere to the Modern Slavery Act, 2015.

We will continue to review our processes to continuously reduce the risks of modern slavery in our operations.

4. Risk assessment and management

We have assessed our risk of modern slavery as low. This is on the basis that we will continuously monitor our adherence with controls in place; our distributors are regulated by both the PRA and FCA; and all our business is conducted in the UK.

5. Key performance indicators to measure effectiveness of steps being taken

We confirm that there have been no known instances of modern slavery in our organisation or reported within our supply chain in the last 12 months.

6. Training on modern slavery and trafficking

Annual training is provided to staff to ensure awareness of all policies within the employee handbook and policies relevant to each role.

We are members of the Association of Financial Mutuals (AFM) who provide regular training and use Skillcast for ongoing regulatory and compliance training for CPD.

This statement was approved by the Board on 12 September 2023.

Jon Gratland
Chief Executive