



Modern Slavery Act Statement 2018

Introduction

This is Canada Life's third statement on its approach to modern slavery following the introduction of the Modern Slavery Act 2015 (the "Act"). At Canada Life we recognise the importance of the Act and what it aims to achieve in combatting modern slavery, and, as a responsible business, we understand our duty to act ethically and with integrity.

This statement sets out the steps that have been taken to ensure the detection and prevention of modern slavery across Canada Life's UK operations and supply chains, and the next steps planned for the coming financial year.

Our Business

At Canada Life, we provide retirement, investment and protection solutions to individuals, families and companies. We have 468,976 pension annuities in force, cover 2.87 million UK-based employees through our group insurance products and manage more than £37 billion of equities, fixed income and property, as well as a comprehensive multi-asset range through our investments division. Canada Life has over 1,200 employees in the UK. Canada Life sells its products to individuals and corporate entities located in the UK through professional advisers.

Canada Life is a UK-based subsidiary of the Great-West Lifeco group of companies, which has operations in Canada, the United States, Ireland, and Germany. We have been operating in the UK since 1903.

We are committed to reviewing our business operating model and processes regularly to ensure that our risk exposure to modern slavery is managed and monitored appropriately.

Our Employees

We have considered Canada Life's internal policies and procedures in respect of preventing modern slavery from taking place anywhere within our business. Our Code of Conduct (the "Code") requires all directors, officers and employees of Canada Life to act ethically and in accordance with our core values at all times. All directors, officers and employees are required to acknowledge compliance with the Code and complete a mandatory training module on the Code and ethical behaviour annually.

Our Employment Policy expresses our commitment to ensuring our risk exposure to modern slavery through our operations is managed and monitored appropriately.

Further, we encourage everyone, whether an employee of Canada Life or not, to use our Raising A Concern Policy and procedures to report any issues they are aware of confidentially and, if preferred, anonymously. Our Raising A Concern Policy makes it clear that any concerns, including about compliance with the Act by Canada Life or one of our suppliers, can be reported using these processes. Anyone can raise a concern either by talking to their manager or one of a large group of "designated persons", by filing an anonymous report using a third party online portal or phone line or by speaking directly to the relevant regulatory body.

¹ In this document, 'Canada Life' refers to The Canada Life Group (U.K.) Limited and its subsidiaries which are within the scope of the Act, namely, Canada Life Limited, CLFIS (U.K.) Limited and MGM Advantage Life Limited.

² We use the UK government's definition of 'modern slavery' from the statutory guidance (Transparency in Supply Chains), which encompasses slavery, servitude and forced or compulsory labour, and human trafficking.

³ In each case, as at December 2018.

Our Suppliers

Canada Life's supply chain is comprised of suppliers based across the world, though the majority have all or part of their business operations in the UK. Our suppliers provide a range of products and services, including IT software, catering, cleaning, office furniture and equipment, utilities, property management and maintenance, and printing.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We completed a review within our internal procurement functions which identified our highest risk suppliers. Because of the nature of our business and our suppliers, our assessment showed a lower risk profile than in many other industries. To assist with supplier management, we have adopted a centralised supplier management software solution. A part of that system is conducting due diligence on prospective suppliers. We have introduced due diligence questions which obtain confirmation from prospective suppliers' that they, their affiliates and their subcontractors comply with the Act.

To combat the risk of modern slavery occurring in our supply chain, we continue to ensure that our contractual terms include an obligation to comply with the Act. Where we learn of a breach by a supplier of our contract terms or a failure to comply with the Act, a report detailing the breach and the remedial actions to be taken will be presented to the UK Executive Management Committee.

Our Outsourcing and Supplier Management Policy reflects our continued commitment to the Act and our obligations in managing our supply chain. We have also built controls into our contract risk assessment process to identify our risk exposure to suppliers.

Our Next Steps

We are committed to the continual development of our processes and procedures to ensure that modern slavery does not take place within Canada Life or its supply chains.

We have allocated our UK Executive Management Committee with the responsibility of assessing the effectiveness of the actions taken to prevent modern slavery at Canada Life. Our UK Executive Management Committee consults and collaborates with our relevant business departments, including but not limited to, Compliance, Legal, Risk, Finance and Human Resources and will monitor the number of suppliers that we have contacted about the Act and the regularity of these communications, as well as consider further firm-wide initiatives over the next year.

To assist with risk management of our suppliers, we are aiming to put in place a dedicated procurement function, which will be responsible for the tendering process, the selection of suppliers, and the due diligence carried out on those suppliers.

We also plan to raise awareness of modern slavery and Canada Life's role in combatting it by incorporating modern slavery into our training on ethics and the Canada Life Code. On the next update of our Recruitment Policy, we will incorporate specific requirements to ensure that any worker who provides services to Canada Life through a recruitment agency is being treated in accordance with the Act and that modern slavery is not occurring within our recruitment agencies' supply chains.

This statement is made by The Canada Life Group (U.K.) Limited on behalf of itself and its subsidiaries pursuant to section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018. The directors of the Canada Life entities identified within scope as well as The Canada Life Group (U.K.) Limited Board have approved this statement.



Signature of Director of The Canada Life Group (U.K.) Limited
16 May 2019



Canada Life

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