



## LV= Modern Slavery Statement For the year ended 31 December 2019

### Purpose of this Statement

This statement is made pursuant to section 54 of the Modern Slavery Act (the “Act”). The Act defines modern slavery as “slavery, servitude, and forced or compulsory labour” as well as “human trafficking” (“modern slavery”).

This statement sets out the approach and steps taken by Liverpool Victoria Financial Services Limited<sup>1</sup> (“LVFS” or “LV=”) and its relevant subsidiaries<sup>2</sup>, to ensure that modern slavery is not taking place in any part of our business or supply chains.

### Our Business and Organisational Structure

We are a leading financial mutual based in the UK and as at 31 December 2019, employed 5141<sup>3</sup> people. We offer our services direct to consumers, through financial advisers and brokers, as well as through partnerships with reputable organisations.

LVFS is the Group’s ultimate parent company. To view LV=’s organisational structure as at 31 December 2019, please click [here](#).

Following two years of a successful strategic partnership, on 31 December 2019, LV= sold its remaining shareholding in its general insurance business to Allianz Holdings PLC. Of the seven subsidiaries<sup>4</sup> which were transferred to Allianz, four are subject to the requirements of the Act.

Following the sale, LV= is now a focused savings, retirement and protection business and has direct and indirect ownership of 33 subsidiaries. To view LV=’s organisational structure as at 1 April 2020, please click [here](#).

### Our Values and Policies

Our purpose is to help our customers live more confident lives. Life can be unpredictable so Green Heart Support, which was launched in 2017, is all about making them feel special - listened to, supported and valued. The essence of Green Heart Support is simple. We’re here for our customers when extraordinary, unusual or life-changing things happen; providing gestures of support when it’s needed the most but expected the least. In 2019 we made a difference to over 1400<sup>5</sup> customers and members.

In 2017, we were one of the first ten businesses to sign-up to the Buy Social Corporate Challenge, which aims to push £1 billion of spend towards social enterprises. Since our

<sup>1</sup> On 2 January 2020, LV= converted from a Friendly Society to a company limited by guarantee and changed its name to Liverpool Victoria Financial Services Limited.

<sup>2</sup> This statement is made on behalf of LVFS and each of its subsidiaries set out in the appendix at the end of the statement.

<sup>3</sup> LVFS employs 1700 employees. LV GI employs 3441 employees.

<sup>4</sup> The GI group consists of: Liverpool Victoria General Insurance Group Limited, Liverpool Victoria Insurance Company Limited, Highway Insurance Company Limited, Highway Insurance Group Limited, LV Assistance Services Limited, LV Insurance Management Limited and LV Repair Services Limited.

<sup>5</sup> The Life business supported 450 customers and members; and GI supported 966.





first partnership with WildHearts back in 2018, we're now working with a number of other social enterprise companies as part of our supply chain. From stationery and media production, to soap and baby gifts, we're committed to the challenge.

## **Human Rights**

Our Human Rights policy confirms our commitment to upholding the standards set out in the United Nations ("UN")'s Universal Declaration of Human Rights, the International Labour Organisation ("ILO")'s Standards and the Human Rights Act 1998, amongst others.

LV= considers that the most relevant human rights to its business are the right to just and favourable working conditions, the right to be free from discrimination, protection of minorities and the right to be free from compulsory labour.

It is important to us to promote an open and honest dialogue within our business and our employees are encouraged to raise concerns via our dedicated Speak Up (whistleblowing) line.

## **Our Supply Chains**

Our supply chain is divided into multiple categories which are built around supporting our core functions and include motor, household, legal and claims services, business process outsourcing, marketing, facilities management and property, HR and professional services.

## **Due Diligence and Risk Assessment**

As a financial services organisation, we continually assess and consider the risk of modern slavery existing within our business and currently deem this to be low. However, we respect and acknowledge that modern slavery is a global issue and that no economy, industry or sector is exempt and we are fully committed to complying with the objectives of the Act.

We continue to operate systems and appropriate measures to help mitigate risk, ensuring that we are prepared and vigilant against any situations that may arise. This includes the on-going due diligence and oversight of our supply chain utilising the Financial Services Qualification System ("FSQS"). FSQS is an intuitive automated due diligence and policy compliance system which LV= uses to monitor and assess supplier compliance on an annual basis. This contains multiple risk areas and includes a bespoke modern slavery assessment. FSQS is also utilised by numerous other financial institutions, which ensures we have a consistent approach.

It is important to LV= that all suppliers represent us in a manner that reflects our values. Our standard contract terms and conditions and our Procurement Code of Conduct & Ethical Standards (the "Code") include a specific clause that expressly prohibits the use of





modern slavery. All of our suppliers are expected to comply with the standards outlined in the Code.

### **Training**

We are committed to ensuring that employees throughout the business, particularly the Procurement and Human Resources teams, have the knowledge and understanding of the Modern Slavery Act in order to properly discharge the legal and ethical responsibilities we must comply with.

### **Effectiveness in Combating Modern Slavery**

We acknowledge that the duty to mitigate against the risk of modern slavery occurring in our supply chain is an on-going responsibility. We will continue to review our processes and assess the responses received from our suppliers' questionnaires in order to measure the effectiveness of the practices we have adopted and operate.

### **Approval and Signature**

This Statement has been approved by the boards of the entities identified within scope as listed in the Appendix, as well as the Board of Liverpool Victoria Financial Services Limited.

A handwritten signature in black ink, appearing to read 'Alan Cook', with a long horizontal flourish extending to the right.

**Alan Cook**  
Chairman





## Appendix

### **List of entities within the scope of section 54(2) of the Modern Slavery Act 2015**

- Frizzell Financial Services Limited
- Highway Insurance Company Limited
- Liverpool Victoria Financial Services Limited
- Liverpool Victoria Insurance Company Limited
- LV Repair Services Limited
- LV Capital Limited
- LV Insurance Management Limited

### **Other LV= entities not within scope of section 54(2), but subject to LV='s modern slavery policies and practices**

- Highway Insurance Group Limited
- Liverpool Victoria Financial Advice Services Limited
- Liverpool Victoria General Insurance Group Limited
- Liverpool Victoria Life Company Limited
- LV Assistance Services Limited
- LV Commercial Mortgages Limited
- LV Equity Release Limited
- LV Life Services Limited
- LV Protection Limited
- NM Pension Trustees Limited
- Sovereign Unit Trust Managers Limited
- Teachers Assurance Company Limited
- Teachers Financial Services Limited
- Teachers Management Services Limited
- Teachers Property Limited

