

MyCSP Slavery & human trafficking statement

Introduction from the Chairman

Human rights abuses including human trafficking and modern day slavery, are a blight on our society. MyCSP takes its responsibilities under the Modern Slavery Act seriously and acknowledge our responsibility to be alert to the risks however small in our business and wider supply chain. Employees are expected to report concerns and management are expected to act upon them.

This statement constitutes our Company statement on modern slavery and anti trafficking for the financial year 2016.

Organisation structure

MyCSP is joint venture between Equiniti, HM Government and our employees and forms a subsidiary of Equiniti Group. The Company is registered in the UK and all operations including through our supply chain are largely based in the UK.

The Company has a turnover in excess of £40m and over 500 employees.

Our business

We are a UK based pensions administrator delivering outsourced services in the main to UK public sector bodies or their suppliers. We are based in two sites – Liverpool and Cheadle.

Our supply chain

Our supply chain includes the sourcing of IT and related services, print & distribution, some call handling as well as specialist pensions services. Our supply chain is UK based.

Our policy on slavery & human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our organisation or through our supply chain in any part of the business. Our Anti-Slavery policy reflects our corporate social responsibility commitment to act ethically and with integrity in all our business relationships; to implement and enforce effective control systems to ensure slavery and human trafficking is not taking place anywhere in our business.

Due diligence

As part of our efforts to identify and mitigate risk:

- All operational delivery remains in the UK

- All recruitment into the company is overseen by an HR specialist who ensures that recruitment and employment practices comply with company policies and UK employment legislation
- Our employees are paid above the national minimum wage and our policies are compliant with the Working Time Directive
- We do not operate zero hours contracts
- All employees have access to our whistleblowing procedures and advice from the independent organisation Public Concern at Work's helpline as well as a recognised trade union.
- We maintain a formal Code of Conduct for our employees
- All contract procurement is overseen by a contract and procurement professional who ensures that procurement and contract management complies with company policy and recognised good practice.
- Where possible we build long standing relationships with key suppliers and make clear our expectations of business behaviours and compliance with UK law.
- Company policies are made available to all employee partners via the company intranet
- Compliance risks are reported on a monthly basis to the company board and scrutinised on a regular basis by our executive risk and compliance committee and the audit committee.

Supplier compliance

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors, including employment agencies supplying temporary staff, to comply with our values and policies in this area. Where potential risks warrant, this is supported by specific clauses in our supply contracts.

The procurement & supplier management function are responsible for ensuring compliance by contractors and suppliers.

Training & awareness

All Directors and senior managers have been briefed on this topic and we provide mandatory training in equality & diversity issues to all employees. Employees in HR and contract management & procurement are expected to familiarise themselves with the company's policy and to be familiar with good practice guidance issued by their relevant professional bodies and HM Government. In addition they are required to complete specific awareness training on Modern Slavery annually. We provide an online learning module for all employees on Modern Slavery as part of our suite of compliance training courses.

Our effectiveness

Compliance with the provisions of the Modern Slavery Act form part of our corporate compliance monitoring programme. Levels of risk and compliance are reported to the Board on an annual basis.

Signed on behalf of the Board

Mark Lund

Acting Chair

27 July 2017