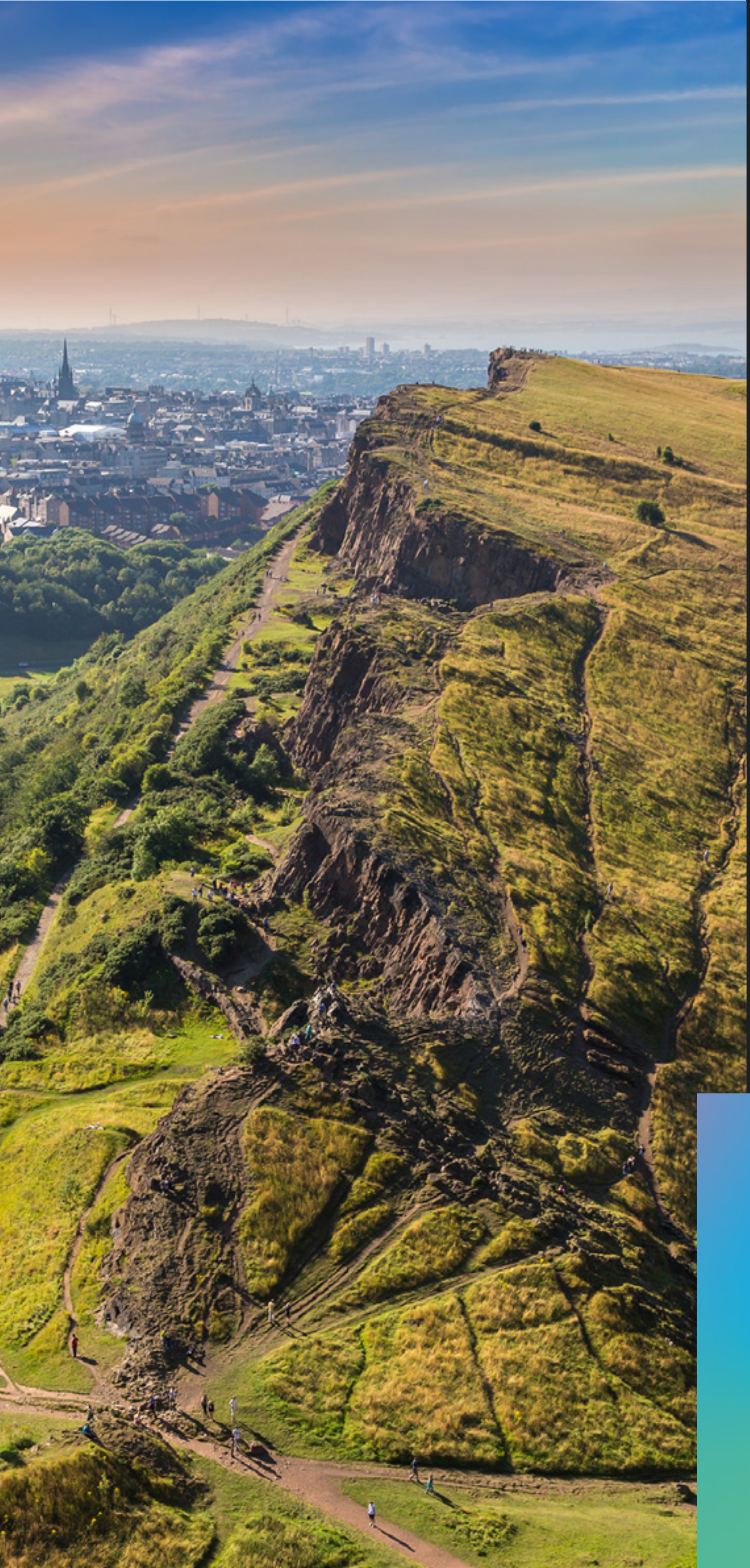


Modern Slavery Act Transparency Statement

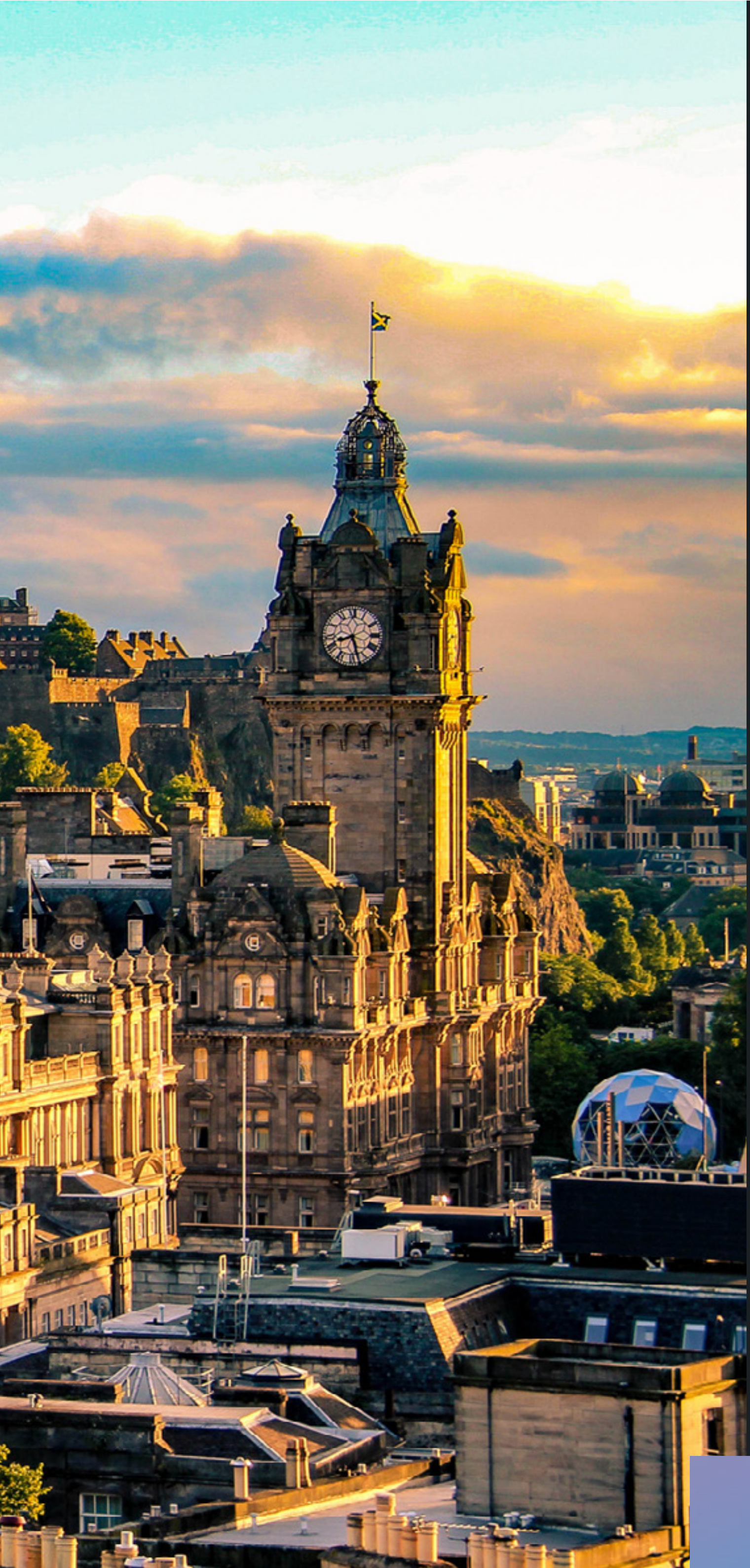
Our approach to defeating slavery

Introduction from the Managing Partner

Our values are to be straightforward, confident, partnering and friendly in all that we do, and our response to modern day slavery lives these values out by:

- paying at least the real living wage to all of our people;
- acting ethically and with integrity in all our business relationships; and
- enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

In relation to modern day slavery, we have a zero tolerance approach in every aspect of how we do business.



Our structure and business

We're an independent partnership helping to build better financial futures for millions of people across the UK. With over a century of experience, we provide services to organisations and individuals across pensions and investments. The firm employs over 1200 people in four UK offices in London, Glasgow, Edinburgh and Birmingham and a small number of people based in the US and Canada. The Hymans Robertson group has an annual turnover of c. £151 million.

Our subsidiary companies provide data analytics (Club Vita UK LLP, Club Vita LLP, CV Canada Ltd and Club Vita US, LLC), personal wealth financial services (Hymans Robertson Personal Wealth LLP) and investment management services for the UK retail advised sector (Hymans Robertson Investment Services LLP).

Given our role in the financial services sector, we believe that there is a low risk of slavery or human trafficking having a connection with our business activities. In particular, we do not rely on agency staff or subcontractors to provide our core services and products. But there is no room for complacency in that belief, so, amongst other things, we have taken the steps detailed below.

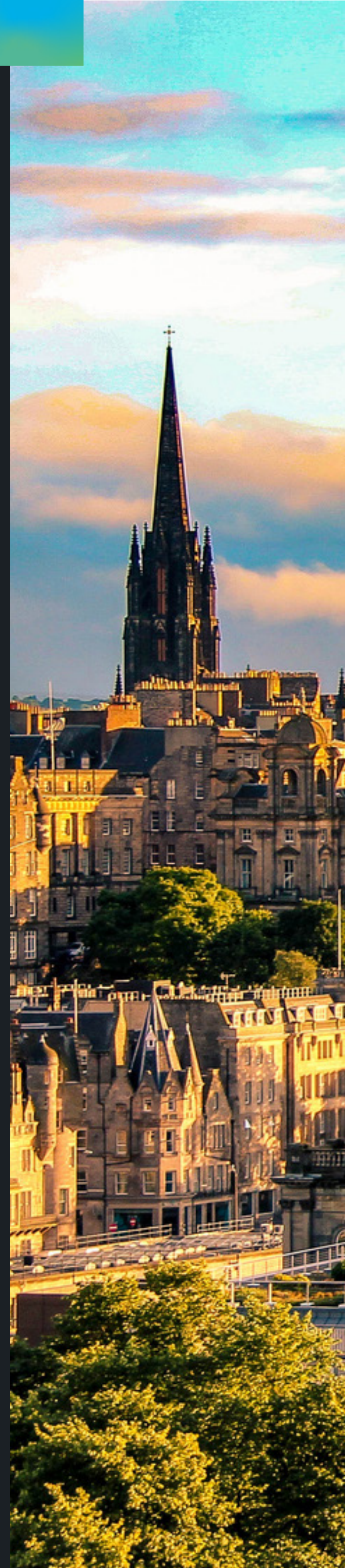
Our policies on slavery and human trafficking

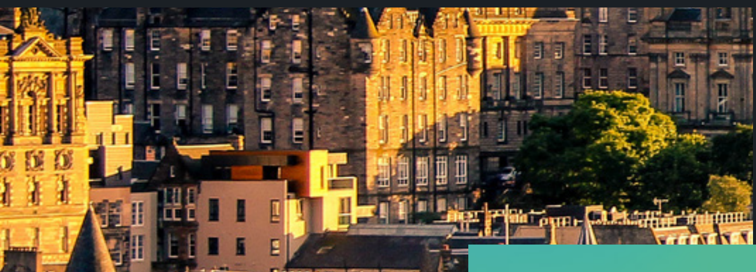
The main policies and processes enforcing and supporting our approach to anti-modern slavery and human trafficking include:

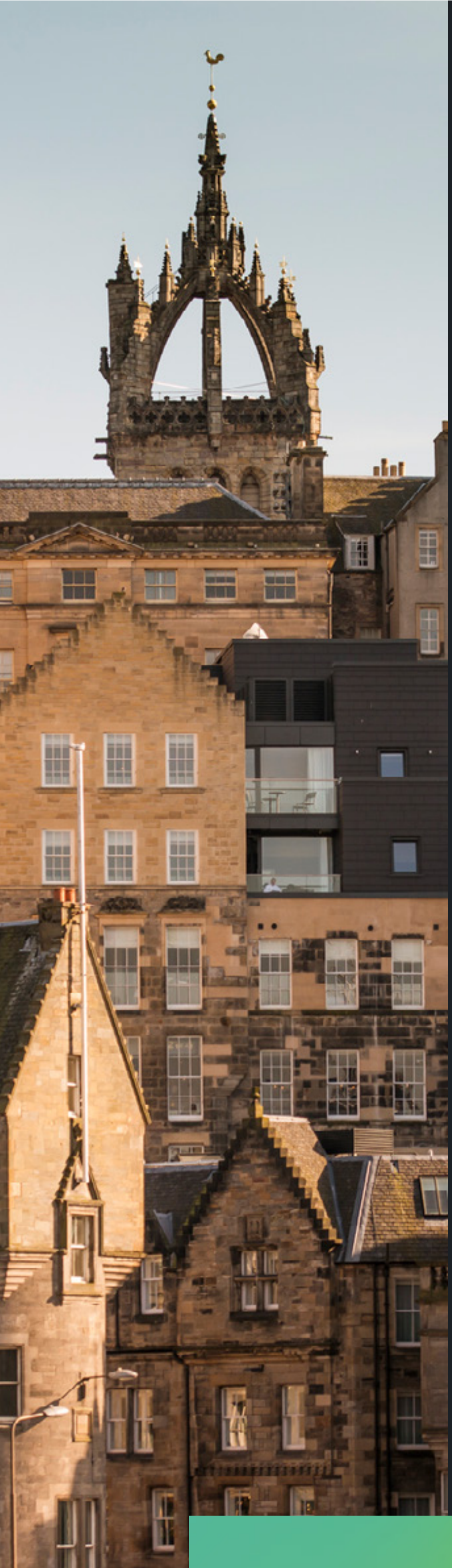
Anti-Slavery and Human Trafficking Policy
The responsibility for preventing modern slavery within our firm starts with a top level commitment from our Management Board, but requires the engagement of our entire workforce to successfully achieve our goal of zero tolerance. We have therefore implemented a mandatory internal Anti-Slavery and Human Trafficking Policy to make our workforce aware of their individual obligations within the firm's anti- slavery framework.

Fair Pay
Hymans Robertson LLP is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. We are an employer committed to paying at least the living wage set each year by the Living Wage Foundation. In addition, the firm offers enhanced maternity, adoption, paternity and shared parental leave entitlement, available to every employee from day 1 of their employment and does not use zero hours contracts for any appointments.

Responsible Investment Policy
We are conscious of the asset managers, insurers and pension providers we engage with and their commitment to responsible investment. When the assets of our clients are invested, there is potential for modern slavery exposure to arise through the supply chains of the organisations they invest in. Our Responsible Investment Mission Statement reflects our commitment to make sure that investment decision-making considers the positive and negative impacts on people and the planet. Modern slavery is one of four focus themes at the core of our ongoing dialogue with asset managers and other parties. We educate our clients on the issues surrounding modern slavery and how this can arise in their portfolios, as well as scrutinising the policies and processes of the asset managers, insurers and providers we work with. We take time to understand these providers' position on responsible investment through data we gather from them and the subsequent engagements that take place. We engage with asset managers on specific issues that may arise in client portfolios, and we work closely to understand the proactive steps they are taking to mitigate the risks.







B Corp Certification

Hymans Robertson LLP certified as a B Corporation in August 2023. B Corp certification is verified by B Lab - a global non-profit network with a mission to inspire and enable people to use business as a force for good. It's a designation that a business is meeting high standards for social and environmental impact, that it has made a legal commitment to stakeholder governance, and that it's demonstrating accountability and transparency by disclosing this record of performance in a public B Corp profile. Our people policies, CSR, DEI and governance approach align closely with B Corp's standards and helped us reach the 80-point 'minimum requirement' score in their impact assessment. We were delighted to certify with an overall score of 84.9 and we are now working towards recertification under B Corp's new, enhanced standards in 2027.

A key feature of B Corp certification is the rigorous verification process conducted by B Lab, while our certification includes committing to transparency in our supply chains; implementing standards, policies, tools and programs to benefit all stakeholders and working to ensure an inclusive and diverse culture in our business.

Diversity, Equity & Inclusion (DEI)

Our approach is grounded in equity, inclusion, and respect for all colleagues. We work collaboratively with colleagues across the firm to support the development and review of people policies and practices, helping to ensure they remain fair, inclusive and accessible and promote the dignity and wellbeing of our people.

We continue to strengthen our approach through workforce insight, employee engagement, external benchmarking and accreditation. We draw on external expertise, colleague feedback and demographic data to better understand barriers to inclusion, inform action and support equitable outcomes across the employee lifecycle.

Our internal DEI Community Groups play an important role in sharing lived experience, raising awareness and providing valuable insight across the firm. We've progressed our review of workplace adjustments, helping us better understand colleague experiences and identify opportunities to improve accessibility and support.

By embedding inclusion, accessibility and respect into our culture and governance, we contribute to an environment that promotes dignity, fair treatment and wellbeing for all colleagues.

Whistleblowing

Our firm encourages all its employees, customers and other business partners to report any concerns related to its direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to report any concerns or suspicions, without fear of retaliation. Our Whistleblowing Policy and Procedure complies with the Public Interest Disclosure Act 1998 (PIDA), which provides protection for workers who raise legitimate concerns about a specified matter; and provides contacts for reporting a matter either internally or externally, including reporting to the Financial Conduct Authority. We also have a Speaking Up Policy, which aims to ensure we nurture the right culture and environment which encourages employees to challenge and speak up at work.

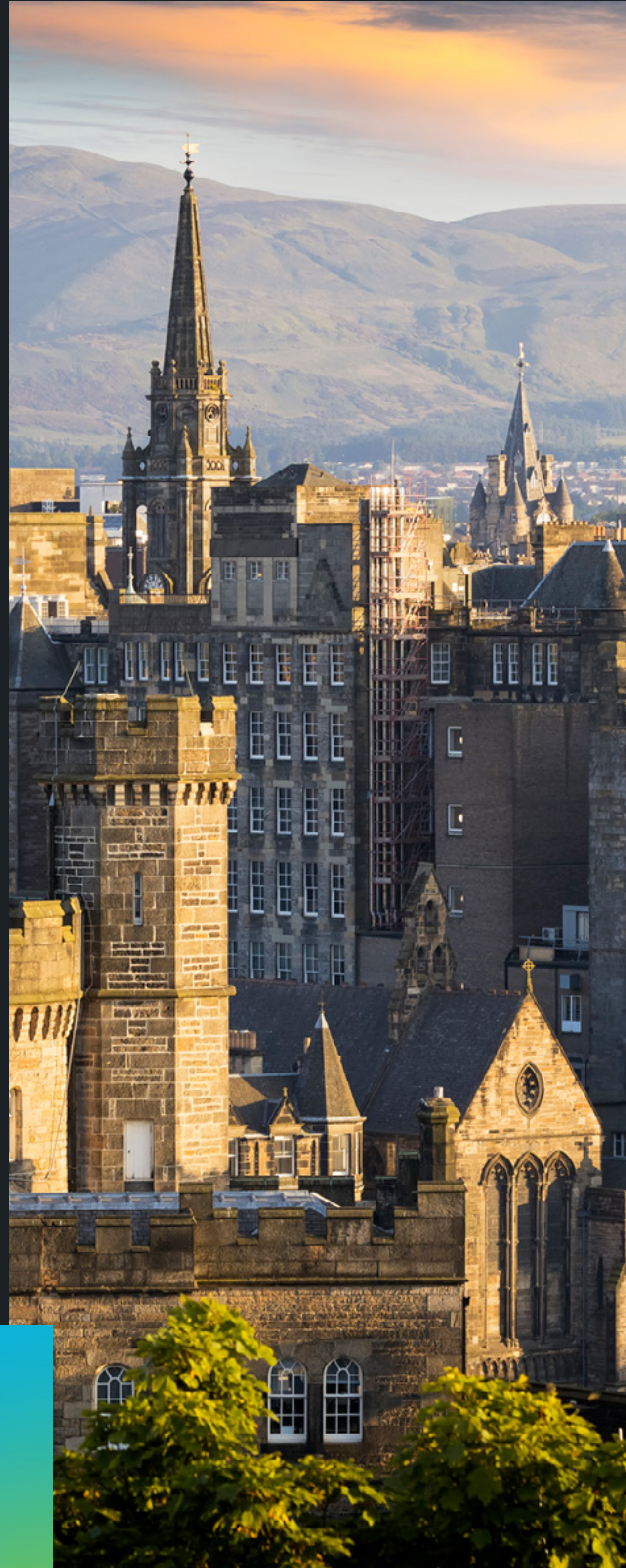
Employee Awareness

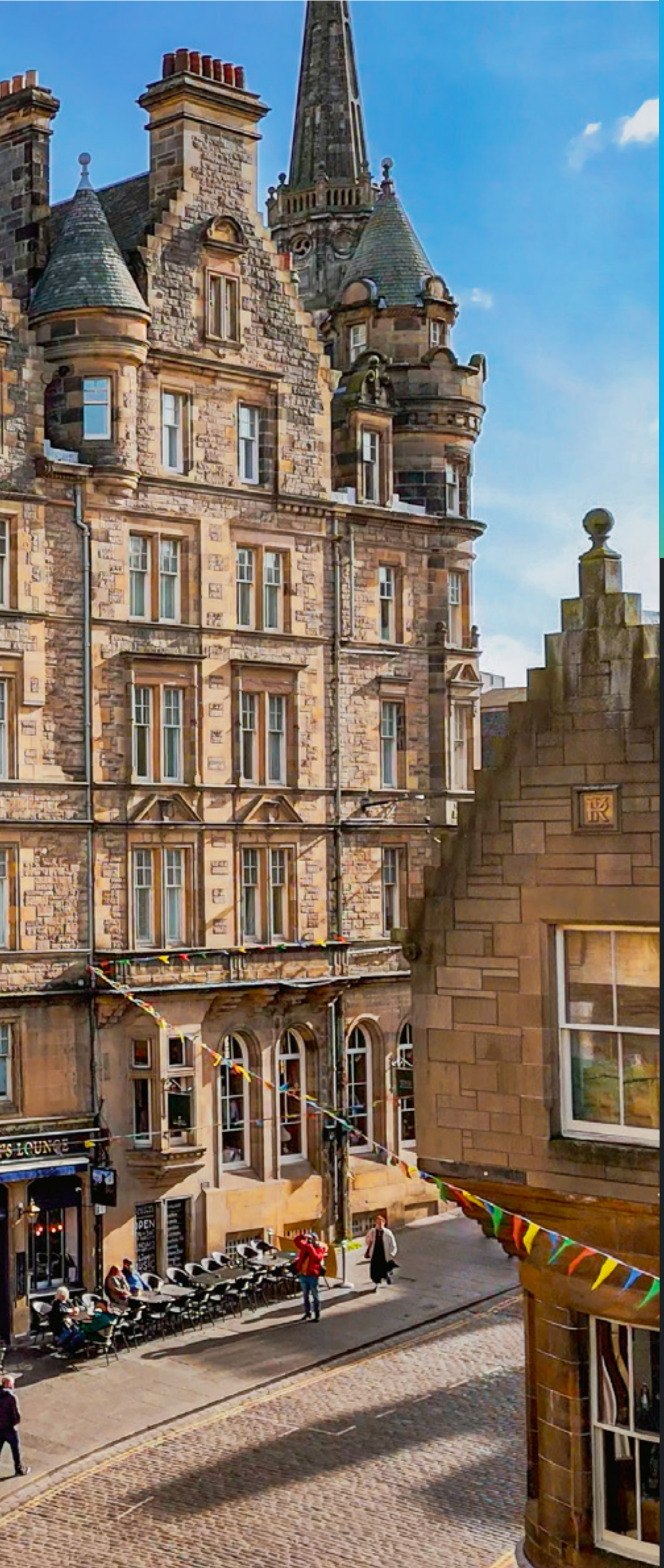
Hymans Robertson's employment policies and principles are readily available and accessible to employees. This includes our Anti-Slavery and Human Trafficking Policy.

Recruitment

Most of Hymans Robertson's workforce is employed directly on a permanent or fixed term basis. All employees who join us are subject to checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These include verification of identity, references, evidence of qualifications, residency rights, criminal and financial checks. In 2021 Hymans Robertson was awarded the Employer Network for Equality & Inclusion's (now Onvero) TIDE accreditation and has retained it ever since. This reflects the firm's successful performance against this framework and its commitment to fair and inclusive recruitment.

For the few roles in our business which are filled by agency workers, we ensure that similar checks to those for employees are carried out. If using an agency, we do this by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory. We continually monitor changes to UK Right to Work legislation to ensure that any additional checks required to be conducted by Hymans Robertson are completed in full and in accordance with current legal requirements. The agencies themselves will have been subject to our rigorous supplier relationship management process which includes due diligence on their organisation.





Suppliers
All supplier information and associated documents are recorded on a centralised internal system by the supplier Business Owners. New supplier entries trigger our formal supplier verification and due diligence process, which is supported by our Supplier Management Team. A copy of our Anti-Slavery Statement is on our website and is available to our suppliers, and we request and review a copy of their statement (where available), as well as undertaking a number of due diligence checks on them.

We also have a Supplier Code of Conduct which is on our website and suppliers are directed to review and confirm compliance to this during the onboarding process. When we are appointing a supplier, there are key areas and questions our process mandates that the Business Owner must consider to ascertain whether there is an additional risk of slavery or human trafficking.

These include country, sector, activity, business partnership, complexity of structure, previous offender, economic and operational pressure and low pay risks. If any of these areas are highlighted to be at higher risk of modern slavery then additional questions around employment contracts, country of service delivery etc are asked of the supplier as part of our due diligence process.

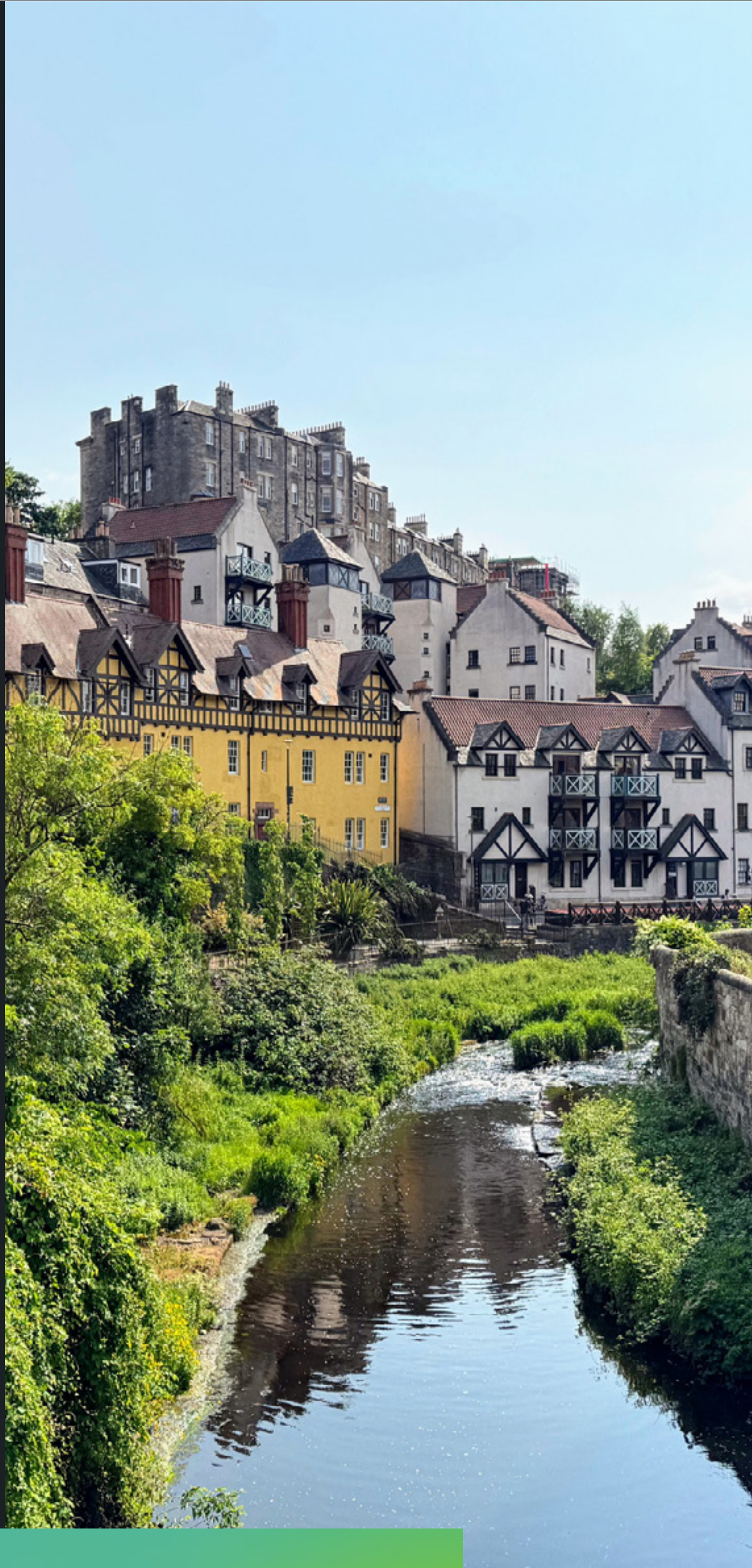
The answers are then reviewed to ensure the business is comfortable with appointing the supplier. The answers to all our due diligence questions are recorded in our central supplier database in Microsoft Dynamics giving a clear, reportable picture of any modern slavery risk to the firm. In addition, where we engage suppliers on our own terms, these contracts contain clauses enforcing compliance with the Modern Slavery Act 2015.

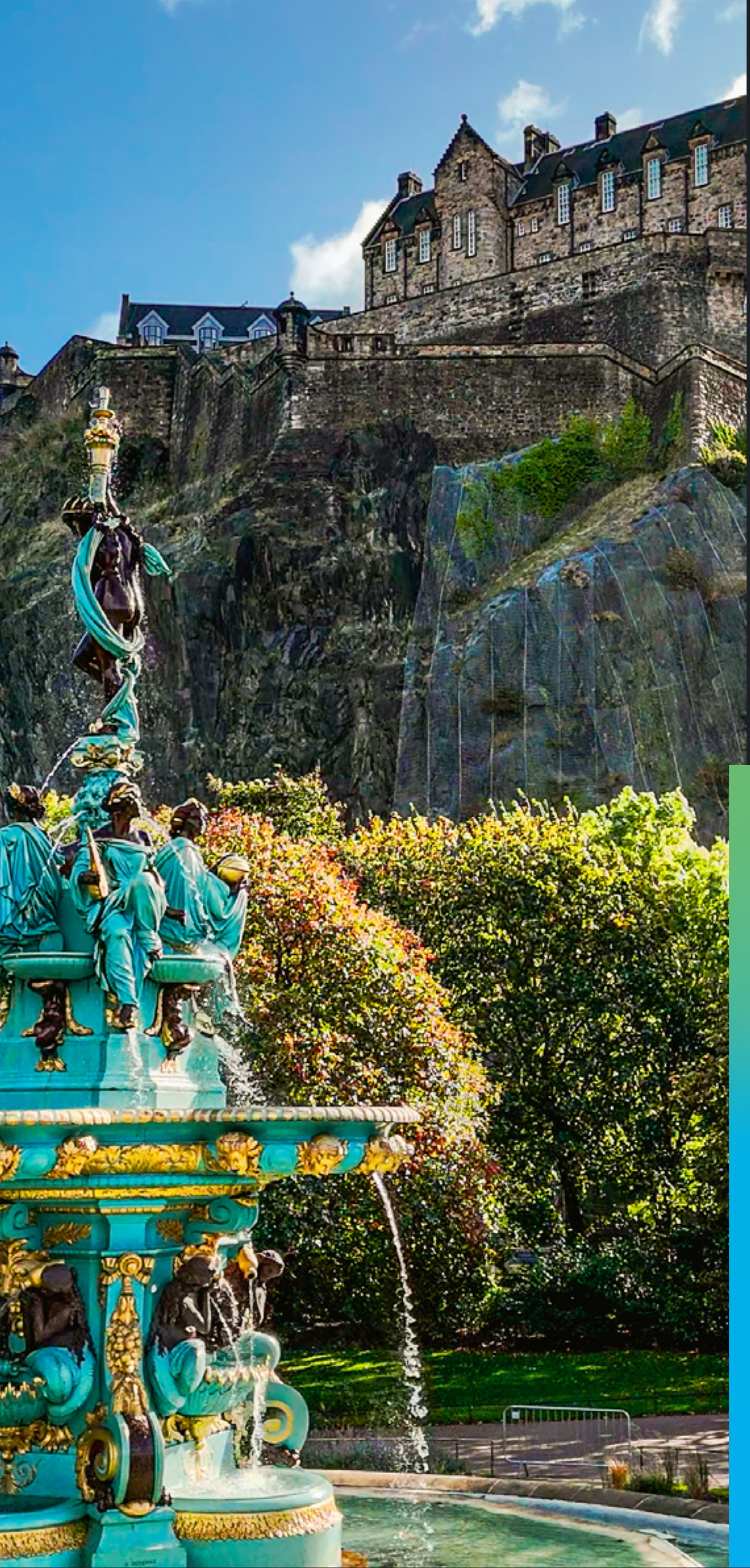
Training
Last year we carried out targeted anti-modern slavery training with key stakeholders in the business from our Supplier Management, Human Resources, Facilities and New Business teams. These individuals were identified as working in areas that could benefit from enhanced training on modern slavery risk. The training covered an overview of the legislative landscape in the UK, how it applies to us as a firm and our anti-modern slavery process.

We will continue to provide training to mitigate risks of modern slavery in the business. We also ask our workforce to confirm their agreement and understanding to our Anti-Slavery and Human Trafficking Policy in our annual staff declaration.

Communication and enforcement of this statement
We communicate updates to this statement and our Anti-Slavery and Human Trafficking Policy to our workforce using our internal intranet. Please see the 'Training' section above for more details on our annual staff declaration. Any employee who breaches the Anti-Slavery and Human Trafficking Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have completed an assessment of the risks linked to modern slavery and the details of due diligence and other risk management processes we have in place, including identifying where modern slavery and any other workforce issues are covered by the firm's policies. The core principles of this statement are built into our Supplier Code of Conduct which new suppliers are directed to during onboarding. We must be satisfied that our suppliers meet the minimum requirements contained in our Supplier Code of Conduct as part of our onboarding process, otherwise they will not satisfy our due diligence process. We may terminate our relationship with any individuals or organisations in our supply chain if they breach our Supplier Code of Conduct. In addition, our standard supplier terms and conditions contain anti- modern slavery clauses, creating a contractual obligation on our suppliers to comply with the UK's anti-modern slavery legislation and report any relevant breaches to us.





Our Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's statement on the prevention of slavery and human trafficking for the financial year ending 31 March 2026. It has been approved on 24th August 2026 by our Management Board, on behalf of our Members, who will review and update it annually.

Shireen Anisuddin
Managing Partner
Hymans Robertson LLP