

# Modern Slavery and Human Trafficking Statement

Published May 2026

## Introduction

This statement is published on behalf of Sesame Bankhall Group Limited and its subsidiary companies (together, “SBG”). SBG is committed to preventing modern slavery and human trafficking in its business activities and supply chains. This statement outlines the steps that we have taken, and continue to take, to ensure that modern slavery and human trafficking do not occur within our organisation or our supply chains.

## Our Business

SBG consists of several group companies, the most prominent being Sesame Limited (known as Sesame), Bankhall Support Services Limited (known as Bankhall) and Premier Mortgage Service Limited (known as PMS).

Together, SBG offers comprehensive support to the UK's adviser community, uniting intermediaries from various sectors of financial advice. Through Sesame, Bankhall, and PMS, we support wealth, mortgage, and insurance advisers, partnering with them to help them run and grow their businesses.

SBG is owned by Aviva. The ultimate parent company of SBG is Aviva plc.

## Our Policies and Practices

SBG has implemented policies, practices and services to ensure that modern slavery and human trafficking are not present in our business or supply chains. These include:

- **Pre-Employment Checks:**
  - We carry out extensive pre-employment screening for all colleagues, including right-to-work verification, DBS checks, financial checks, identity confirmation and employment-history checks, all of which help reduce the risk of forced labour, illegal working, and exploitation;
  - For regulatory roles, we also complete regulatory references, fit-and-proper assessments, and sanctions screening, all as part of our enhanced due-diligence process; and
  - To ensure that these controls remain effective and consistently applied, our People Team conducts annual risk-based spot checks.
- **Real Living Wage:** We ensure that all colleagues are paid fairly, with no one earning less than the Real Living Wage as set by the Living Wage Foundation.
- **Modern Slavery and Human Trafficking Policy:** This group-wide policy outlines our commitment to preventing modern slavery and human trafficking and defines the responsibilities of our employees and suppliers.

- **Ethics Code:** We maintain a comprehensive business ethics code that sets out the standard of conduct expected from all colleagues. Employees are required to confirm annually that they have reviewed and understood the code, reinforcing our commitment to ethical behaviour and responsible business practice.
- **Grievance and Whistleblowing:** We maintain a clear and accessible grievance policy for all colleagues via our internal hub. We also promote a strong “speak up, listen up” culture, encouraging colleagues to raise concerns early and without hesitation. Concerns can be raised directly with our internal Speak Up team, or anonymously through our independent third-party provider, Navex (EthicsPoint). Early reporting helps us take swift action and continuously improves our working practices.

## Our Suppliers

We conduct due diligence on our suppliers to ensure that they comply with our anti-slavery policies. This includes:

- **Supplier Code of Behaviour:** We ask suppliers to confirm their adherence to SBG’s Code of Behaviour, which includes the prohibition of forced labour and human trafficking.
- **Supplier Onboarding:** We require that our suppliers complete onboarding documentation confirming their adherence to ethical standards, including whether a Modern Slavery Statement is applicable and publicly available.
- **Risk Assessments:** We regularly assess the risk of modern slavery and human trafficking in our supply chains and prioritise high-risk suppliers or services for further monitoring or investigation.
- **Contractual Obligations:** Wherever possible, we include clauses in our contracts with suppliers requiring them to comply with our anti-slavery policies and to report any instances of modern slavery or human trafficking.

## Modern Slavery Training and Awareness

We provide training to our employees to ensure that they understand the risks of modern slavery and human trafficking and know how to identify and report any concerns. This training is mandatory for all employees and is reviewed regularly. All mandatory training is tracked and monitored to ensure timely completion and full organisational compliance

## Monitoring and Reporting

We monitor our supply chains and business activities to ensure compliance with our Modern Slavery Policy and Code of Behaviour. We also encourage employees and suppliers to report any concerns about modern slavery or human trafficking.

We assign each of our suppliers a risk category for modern slavery, based on their:

- industry sector;
- sourcing regions;
- supply-chain depth;
- use of subcontracting;
- nature of work performed;
- adherence to ethical labour standards;
- history of violations;
- workforce transparency;

- presence of vulnerable groups;
- recruitment practices;
- employee benefits;
- training on modern slavery; and
- the existence of confidential whistleblowing procedures.

Suppliers that are high-risk for modern slavery are subject to increased monitoring and reporting.

Reports can be made anonymously by employees via the Speak Up service. For suppliers, we encourage concerns to be raised via their own internal processes, however, suppliers are also able to contact the Speak Up service if needed. Further details are set out in our Code of Behaviour and here:

<https://static.aviva.io/content/dam/aviva-corporate/documents/socialpurpose/pdfs/third-party-speak-up-whistleblowing-policy.pdf>.

## Conclusion

SBG is committed to preventing modern slavery and human trafficking in its business activities and supply chains. We will continue to review and improve our policies and practices to ensure that we are doing everything we can to combat modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes SBG's modern slavery and human trafficking statement for the financial year ending 31 December 2025.

## Approval

This statement has been approved by the Board of Directors of Sesame Bankhall Group Limited.

Signed,

A handwritten signature in black ink, appearing to be 'RH', written over a light grey rectangular background.

Richard Harrison  
CEO  
1 May 2026