

# Modern Slavery and Human Trafficking Statement

Published May 2025

## 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 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

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

- **Modern Slavery and Human Trafficking Policy:** This policy outlines our commitment to preventing modern slavery and human trafficking and sets out the responsibilities of our employees and suppliers.
- **Code of Behaviour** – We require suppliers confirm their adherence to SBG’s Code of Behaviour, which includes the prohibition of forced labour and human trafficking.
- **Speak Up:** Aviva’s confidential and secure whistleblowing service is available to all employees and suppliers to report legal and ethical concerns confidentially and anonymously.

## Due Diligence

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

- **Supplier Onboarding:** We require that our suppliers complete onboarding documentation that confirms their adherence to ethical standards
- **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.

## Training

We provide training to our employees to ensure 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.

## 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.

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 2024.

## Approval

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

Signed,



Richard Harrison  
CEO  
6 May 2025