

# Modern Slavery Act 2015 Statement

## For Financial Year Ending 31 December 2023

**This statement applies to Unum European Holding Company Limited and all its subsidiaries which are based in the United Kingdom ("Unum").**

Unum Limited is the United Kingdom ("UK") operating subsidiary of Unum Group (listed on the New York Stock Exchange). In the UK, our head office is in Dorking, Surrey, and we employ more than 900 people across the country.

Unum Limited is a provider of insurance services in the UK. We provide employee benefits that offer employees protection through employers, our policyholders, such as Income Protection, Life Insurance, Critical Illness and dental cover.

Generally, we sell our insurance products to UK companies through brokers and independent financial advisers.

### **Statement from the Chief Executive Officer, Mark Till – Unum European Holding Company Limited**

Unum's zero-tolerance approach to modern slavery and human trafficking within our organisation extends to tackling the risk of these issues in our supply chains. As part of our core values, we are committed to upholding and promoting all human rights and seek to tackle violations of those rights, including in relation to human trafficking and slavery, wherever we can. Although Unum has identified that the risk of slavery and human trafficking being prevalent within our business is low, we continue to monitor the landscape to ensure that it remains this way.

### **Our Policy on Slavery and Human Trafficking**

Unum is committed to ensuring that, as far as we can be sure, there is no slavery or human trafficking in any part of our business or our supply chains. We aim to have robust systems and controls in place to ensure this remains the case. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in this area.

For example, Unum's Code of Conduct includes a strong focus on reporting concerns, treating others with respect and being honest, fair and trustworthy. As such, we have a whistleblowing policy and a procedure in place to protect whistleblowers who report concerns, including any relating to slavery and human trafficking should they occur.

### **Our Supply Chains**

As a large insurer we outsource some of our business functions, for example elements of our claims payment process and the security of our company buildings. We also have a limited group of third-party suppliers for support services such as Information Technology. These include contracts with companies outside the UK.

As part of our initiative to identify and mitigate risk we have strong processes and controls to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Monitor supplier compliance to our policy as part of our overall third-party supplier risk management programme.

This includes a due diligence procedure whereby we require suppliers to confirm that they adhere to policies equivalent to our own.

## Training

Every Unum employee in the UK undergoes training on anti-slavery and human trafficking as part of their compulsory continuing professional development. This helps ensure high levels of understanding of the risks of modern slavery and human trafficking and their potential impact on our supply chains and our business.

## Our Recruitment Process

Unum has a robust and comprehensive approach to pre-employment checks for all new hires. This is subject to compliance checks and reviews to ensure we continually manage the risk of modern slavery.

Unum has also signed up to the Good Recruitment Charter, part of The Recruitment and Employment Confederation's Good Recruitment Campaign. This defines good recruitment practice, which we adhere to in our hiring process along with all applicable laws.

## Unum's Culture

### Inclusion and Diversity

Unum strives to uphold our commitment to inclusion and diversity throughout our business practices and processes and within the workplace. We aim to be the most inclusive, diverse and welcoming company in the employee benefits market by creating a place where people aspire to work and where everyone can contribute their best and succeed.

Unum is part of the Unum Group inclusion and diversity strategy. We deliver inclusion and diversity training to all new employees, and we are continuing to embed inclusion and diversity as business as usual within all we do.

## Social Responsibility

Unum is a values-driven and purpose-led organisation with an operating model that is centred on doing good for society.

Our employees receive 24 hours per year (equivalent to three days) to volunteer, either in-person or virtually, and we provide numerous opportunities to support good causes through employee fundraising, Payroll Giving, matched donations and the Unum Community and Social Justice Fund.

## Responsible Business and Sustainability

Our responsible business strategy focuses on the critical action areas that we will prioritise as a business to ensure that we strive to meet our vision: inclusive products and services, a responsible employer, minimising our environmental impact and responsible investments.

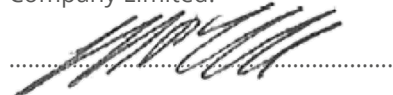
At Unum, we report our emissions annually through our streamlined energy and carbon reporting and are actively working to reduce our emissions year-on-year. We further believe that accounting for our emissions whilst we work to reduce them is the responsible thing to do. We offset the entirety of our reported location-based emissions through carbon reducing projects in partnership with Ecologi.

## Ongoing Commitment

We shall continue to review our processes, policies and training to ensure we are doing all we can to detect, prevent and discourage modern slavery throughout our business and supply chains.

## Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Unum's slavery and human trafficking statement for the financial year ending 31st December 2023 and has been approved by the board of Unum European Holding Company Limited.



**Mark Till**  
**Chief Executive Officer**

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