



Retirement Solutions

Modern Slavery Statement

12.02.25



Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Modern slavery is a serious crime and a violation of fundamental human rights. Modern slavery can occur in any business and it takes various forms such as slavery, forced and compulsory labour and human trafficking.

TPT does not tolerate modern slavery and is committed to taking effective steps to prevent modern slavery as part of our business operations. We ensure that TPT acts ethically and with integrity in all of our dealings and relationships by implementing effective and transparent systems and controls.

Organisational structure

TPT Retirement Solutions Limited (TPT RSL) is a provider of pensions management services to UK occupational pension schemes. TPT RSL provides DB and DC services which are designed to support trustees, employers and members throughout their pension savings journey and beyond.

TPT Investment Management Limited (TPTIM) is a subsidiary of TPT RSL. TPTIM offers fiduciary management and advisory services to UK occupational pension schemes. TPTIM is authorised and regulated by the Financial Conduct Authority (“FCA”). Together, the Company and TPTIM are referred to as “the Group” or “TPT”.

TPT RSL and TPTIM are both governed by boards of directors, which are responsible for ensuring there is a robust framework for managing cultural, ethical, risk and reputational matters effecting our services, our people, our clients and our suppliers.

The Group has two offices in the UK and employs over 280 people. More information in relation to our governance, leadership and services can be found on our [website](#)

Our business

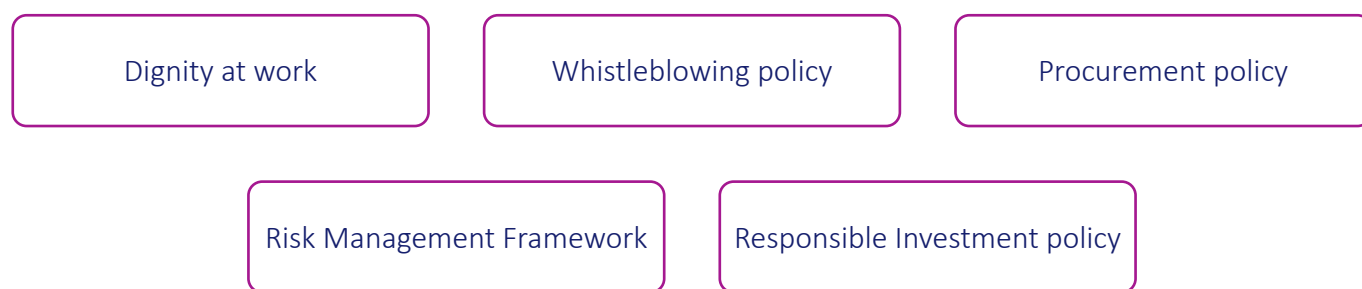
TPT is a professional services firm and does not operate in an industry where modern slavery is commonplace.

TPT completes right to work checks on all employees, with staff required to provide evidence of eligibility to work in the UK, employment references and evidence of educational qualifications relevant to role. Other pre-employment checks are undertaken where proportionate and checks are also undertaken on Agency partners to ensure they are delivering in line with legislation and TPT's expectations when supplying temporary resources.

We expect all our people to treat each other, and those we deal with, respectfully. We do not tolerate physical violence, disrespectful behaviour, bullying or harassment. We encourage people to raise ethical or legal concerns (via our whistleblowing policy), including about human rights, and have a zero-tolerance policy for retaliation against anyone who reports any concerns.

TPT is a Living Wage employer and encourages its suppliers to adopt the same standards within their own staff base.

We have a number of policies in place to support our staff, customers and suppliers including:



We are evolving our approach, in line with the growth of the Group and recognise the ongoing commitment required. We will continue to review and develop our processes and guidance, training and supplier approach towards the detection and prevention of modern slavery and human trafficking as our business evolves.

Supply chain and due diligence

The relationship with our key suppliers is a critical component of our support for human rights. Many of our suppliers are mature and established organisations who accordingly take a thoughtful and risk-based approach to modern slavery. As part of our due diligence questionnaire for new key suppliers, we ask specific questions about labour practices and human rights pertaining to Modern Slavery. We also have controls through supplier relationship management to ensure ongoing good practice. If TPT suspects or becomes aware that an existing supplier is in breach of modern slavery and human trafficking legislation, TPT will investigate and (if appropriate) report the matter to the relevant authorities.

In addition to the due diligence questionnaires for new key suppliers, TPT also has additional procedures in place in relation to its investment activities. We are conscious of the asset managers we engage with and their commitment to responsible investment. When the assets of our clients are invested, there is potential modern slavery exposure for our clients through the supply chains of the corporates they invest in. As noted above, we have a Responsible Investment Policy which reflects our commitment to addressing responsible investment risks, along with several control mechanisms in place to minimise modern slavery risk to our clients. We conduct due diligence with our clients on the issues surrounding modern slavery and how this can arise in their portfolios, as well as scrutinising the asset managers, insurers and providers we work with. We take time to understand their 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.

Training and awareness

We believe in continuous education and in ensuring that our staff are equipped with the right tools and training to be effective in their roles. A course on Modern Slavery will become part of our core mandatory training programme and will highlight the importance of identification and reporting, along with definitions, signs to look out for, and common red flag indicators.

Board approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group statement for the financial year ending 30 September 2024. It has been approved by the Board of Directors on 12 February 2025 as reflected by the Director's signature below.



David Lane

Chief Executive Officer