



# Modern slavery statement 2023

Legal & General Group Plc



# About Legal & General

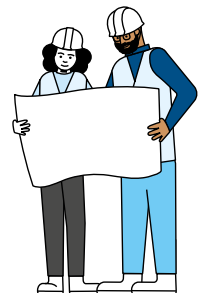
Established in 1836, Legal & General is one of the UK's leading financial services groups and a major global investor, with over £1.2 trillion in total assets under management. We've made it our business to build a stronger, more positive society by making a genuine, lasting social and environmental impact which proves that good beyond business is good for business.

Our purpose is to improve the lives of our customers, build a better society for the long term and create value for our shareholders. To fulfil our purpose, we are investing in long-term assets, such as real estate and infrastructure, that can help build a better society for the future.



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# Our approach and commitment to preventing modern slavery

At Legal & General, we fully understand that modern slavery<sup>1</sup> remains a significant global issue and as a global organisation we remain committed to playing our part in helping to eradicate it.

This is our eighth modern slavery statement. It is published in accordance with section 54 of the Modern Slavery Act 2015. This statement is prepared by Legal & General Group Plc on behalf of itself and its subsidiaries listed in the Appendix to this statement ('the Group' or 'we'). It sets out the steps we have taken during the year ending 31 December 2023 to prevent modern slavery occurring in our business and supply chain.

We are a leading financial services company and major global investor, safeguarding people's financial futures. We have 11,500 employees and our investment management business has £1.2 trillion of assets under management, including investments in real estate and in some of the world's largest companies. We are aware that our position enables us to influence, lead and drive positive change in the communities in which we live and work, and we take this responsibility very seriously.

Whether in our direct operations or as investors of shareholder capital and client assets, we are a purpose-led organisation, committed to doing business in an economically and socially useful manner. This underpins our approach to understanding and combatting modern slavery.

We understand our responsibility to prevent, mitigate and remediate the risks of human trafficking, and forced, bonded and child labour where appropriate; and to respect human rights in our operations and our supply chain. Whilst we acknowledge that there may be human rights impacts within our supply

chain, we are committed to developing a culture that takes these impacts seriously.

Our approach to preventing modern slavery continues to be aligned with the United Nations Guiding Principles on Business and Human Rights. We fully support the principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and we have been a signatory and supporter of the UN Global Compact since 2012. In 2023, we joined the UN Global Compact's Modern Slavery Working Group enabling us to undertake further training on this topic and learn from peers in the industry. We have also recently become a member of Unseen's Business Hub. Unseen is a UK charity that supports survivors of trafficking and modern slavery as well as providing expert support to businesses, communities and governments, among others, aiming to stamp out modern slavery for good.

We take any breach of our policies or allegations of modern slavery and labour abuse extremely seriously. Anyone calling our whistleblowing line about a human rights issue, be they an employee, supplier, customer, or other stakeholder, can do so anonymously if they wish and without fear of retaliation.

In 2023, we focused our activity on training, securing external counsel and support, and undertaking audits across our owned and managed sites, looking for evidence of any modern slavery and breaches of human rights.



1. We adopt the definition of slavery in section 54(12) of the Modern Slavery Act 2015.



# Our businesses

We benefit from scale in each of our businesses. Our businesses work together to deliver on our purpose and to drive synergies across the Group.

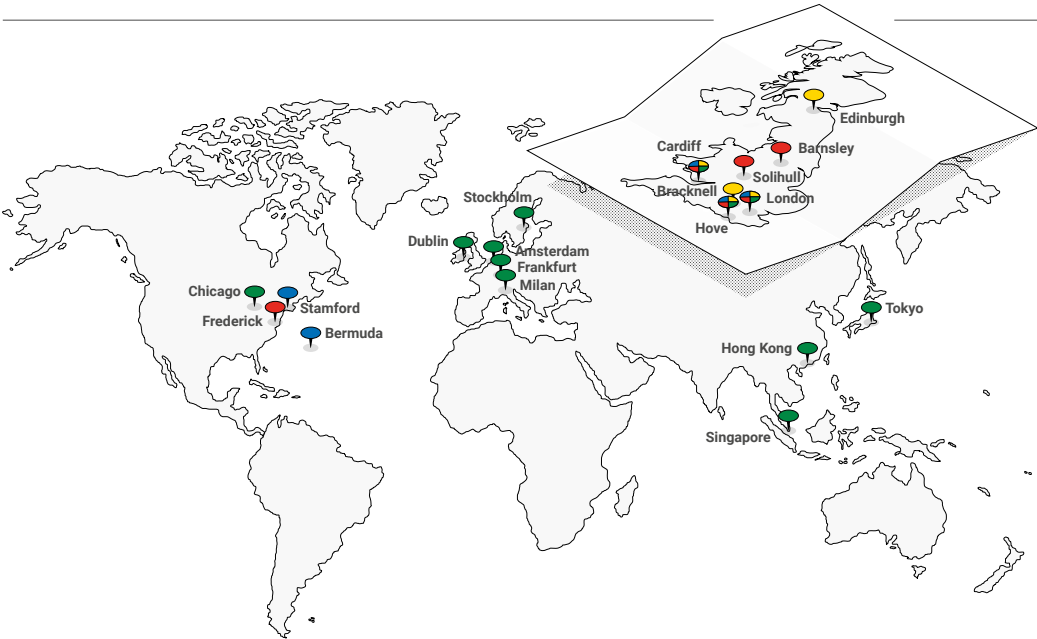
Institutional retirement ('LGR')	Capital investment ('LGC')	Investment management ('LGIM')	Retail
£13.7bn	>4,500	£1.2tn	c. 14 million
new business premiums	homes delivered	assets under management	people's needs met
<p>We take on pension scheme liabilities from corporate schemes in both the UK and the US. This 'pensions de-risking' gives companies greater certainty over their liabilities while providing guaranteed payments to individuals within their schemes.</p>	<p>Our investments across specialist commercial real estate, clean energy, housing and SME finance generate attractive shareholder returns and create alternative assets which benefit society.</p> <p>We are one of the UK's top ten housebuilders by revenue.</p>	<p>We are one of the world's leading asset managers, with internal and external clients.</p> <p>We are the market leader in UK defined contribution schemes.</p> <p>We are also a leader in responsible investment, and continue to innovate and be recognised for our strength in this growing area of the market.</p>	<p>We help millions of people in the UK and the US create brighter financial futures.</p> <p>We support their savings, protection, mortgage and retirement needs through our retail and workplace businesses.</p> <p>We are a market leader in UK Retail protection and retirement income. Our workplace savings business administers the largest and fastest-growing commercial UK MasterTrust.</p> <p>Our US protection business continues to grow due to our ongoing investment in technology and digital transformation.</p>



See more about our business model on page 4

# Our offices

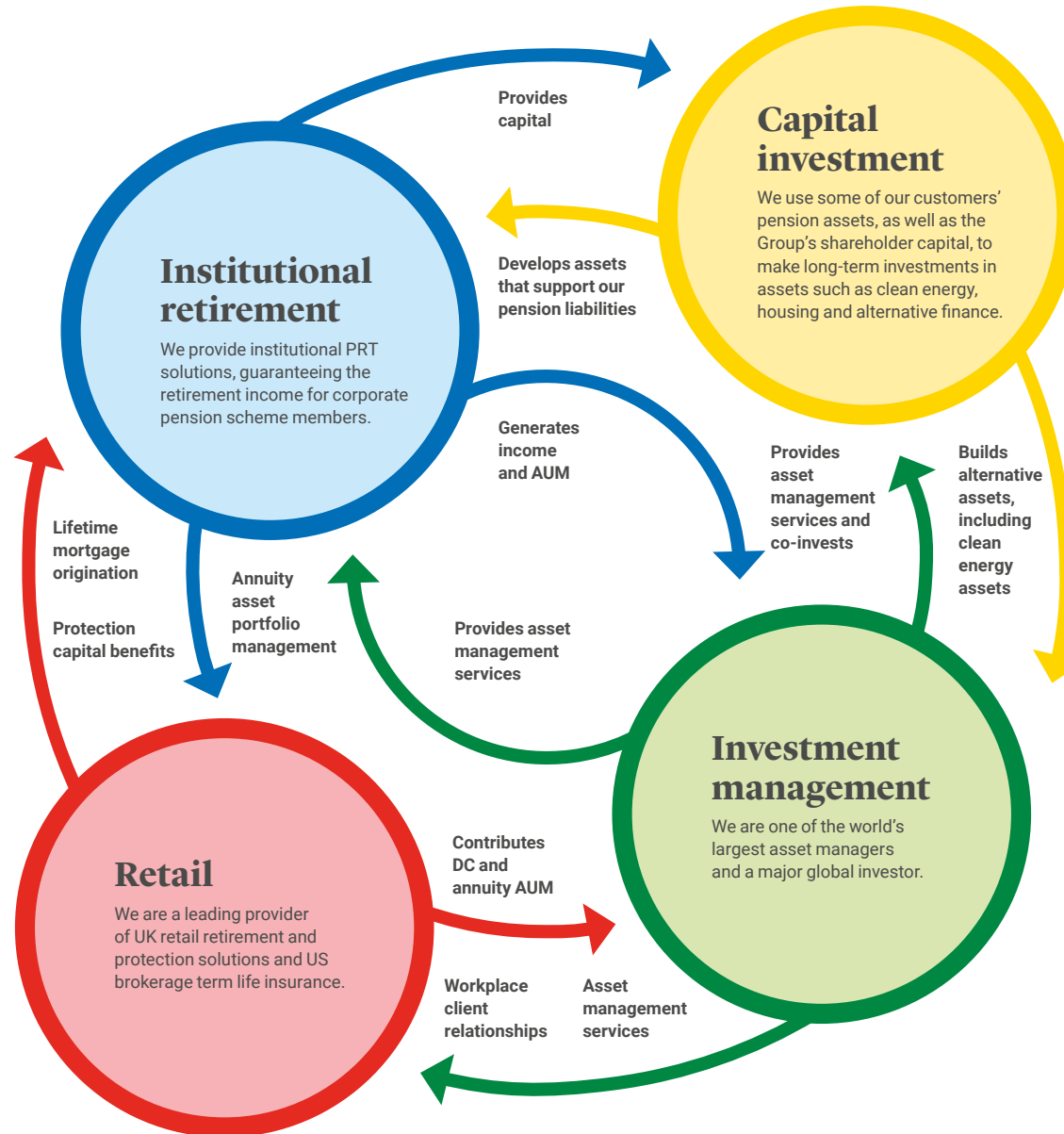
We are expanding our international reach.



# Our business model

## What we do

We aim to be leaders in retirement and protection solutions, investment management and capital investment. By taking a long-term approach to inclusive capitalism, our businesses work together to make a difference.



For further information about our business, please see our 2023 Annual report and accounts.

## Governance

In 2023, we strengthened our governance of modern slavery risks with the creation of a new Health and Safety Committee. It is a sub-committee of the Executive Risk Committee which in turn reports to the Group Management Committee with a dotted reporting line to the Group Risk Committee of our Group Board. The Health and Safety Committee's remit is to provide executive-level direction for health, safety, modern slavery and human rights matters. This includes driving a proactive culture on these topics, agreeing Group policy and maintaining the overall framework for ensuring that material health and safety risks and salient modern slavery and human rights risks are appropriately identified and managed and that legal requirements are met.

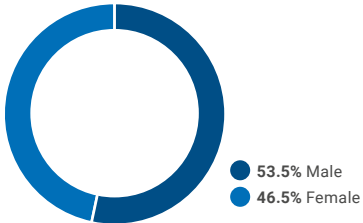
In addition to the Health and Safety Committee, the Modern Slavery and Human Rights Working Group and Forum bring together representatives from across our business who work collectively, helping to minimise the risk of modern slavery in our operations and supply chain. The Working Group meets monthly and the Forum meets quarterly. Both meetings are chaired and facilitated by the Group Sustainability team which oversees all aspects of social sustainability, including modern slavery, for the Group. While accountability for day-to-day prevention of modern slavery remains with our operating businesses, the Group Sustainability team provides a central point of oversight which helps us to coordinate governance and reporting of modern slavery issues. Also represented in the Forum is Unite, our recognised trade union in the UK. Its involvement helps us meet one of the provisions of the Ethical Trading Initiative (ETI) Base Code which is that 'Freedom of association and the right to collective bargaining are respected'.

The Modern Slavery and Human Rights Forum reports annually on its progress to the Group Board.

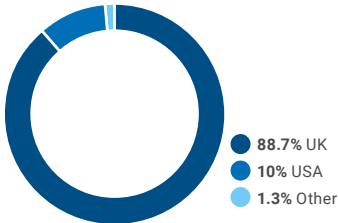
# Our people

We have 11,546 employees, of whom 89% are in the UK, 10% in the USA and the remaining 1.3% in other countries. Throughout the year, in any given month, we employed on average 184 contractors (in our core UK, Modular & Affordable Homes businesses).

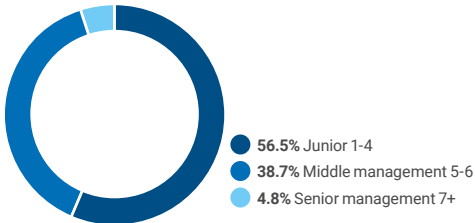
Employees split by gender



Employees split by location (UK, USA and Other)



% of L&G employees by grade



## Employee Handbook

All employees have access to the Employee Handbook, which contains details of all our human rights-related policies, such as whistleblowing, grievance and disciplinary policies.

## Freedom of association

In our core UK business, we recognise Unite as our trade union for collective bargaining. Unite represents 79.4% of our UK employee base for the purpose of collective bargaining. Our more senior managerial grades are represented collectively by an in-house Management Consultative Forum. We are unable to provide the exact percentage of our people who are Unite members due to GDPR reasons.

Our longstanding partnership with Unite (now in its 27th year) continues to flourish. Our mutual objective with Unite is to work together to further the success of the business, and to achieve fairness and equality in the treatment of employees. Details of our collective agreement with Unite are referenced in employee contracts for those on relevant grades in the UK. All new starters, regardless of grade, receive an induction from Unite as part of their on-boarding experience. We collaborate with Unite on modern slavery and human rights issues and a Unite representative is a member of our Modern Slavery and Human Rights Forum.



## Living Wage

We are a real Living Wage Employer (and a member of the Living Wage Foundation), committed to paying our people a fair and respectable wage.

As an asset manager, we also advocate for all companies to ensure that they are paying their employees a living wage and that this requirement should also be extended to all firms with which they do business across their supply chains. We are a member of the Platform for Living Wage Financials (PLWF), a group of 21 financial institutions (with assets under management of over €7 trillion) who are assessing investee companies in certain key sectors to ensure workers in their supply chain, as well as within their organisations, are being paid a Living Wage.

In 2023, we ensured any contractor within our facilities management area working in any of our UK offices was paid the real Living Wage. These roles are typically low paid as they consist of cleaners, porters etc. When the new UK real Living Wage rates were announced in October 2023, we increased the pay for our contractors employed via facilities management ahead of the April 2024 deadline.



11,546

employees globally

89%

of our employees are based in the UK

184

contractors on average in any given month



# Our policies and approach

Our human rights agenda holds us and our people to account in operating to high standards within our own business. We are a real Living Wage Employer (and a member of the Living Wage Foundation), a signatory to the UN Global Compact and an advocate of the UN Guiding Principles on Business and Human Rights and the UN Sustainable Development Goals. We continue to support behaviours which are consistent with the International Labour Organization's (ILO) Core Conventions. The internationally recognised ETI Base Code is reflected in our Supplier Code of Conduct.

The ETI Base Code is founded on the conventions of the ILO and is an internationally recognised code of labour practice. It stipulates the following nine provisions:

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. National Living Wages are paid.
6. Working hours are not excessive.
7. Discrimination is not practised.
8. Regular employment is provided.
9. No harsh or inhumane treatment.

The following policies apply to our business, regarding modern slavery:

## Human rights policy

- This policy applies to our employees and all locations where we conduct business. The policy stipulates that it is every Legal & General employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment.

## CALA supplier code of conduct

- CALA's Supplier Code of Conduct seeks to clarify and safeguard the relationship between CALA and its suppliers, ensuring that high standards are maintained. As with Legal & General suppliers, CALA's suppliers must have certain processes in place in order to work with CALA and be able to provide evidence if required.

## Supplier Management Framework

- We have a holistic Supplier Management Framework encompassing policies, standards, processes and a Supplier Code of Conduct that aim to manage the value and risk of our supply chains. The purpose of this framework is to clarify and safeguard the relationship between Legal & General and its direct suppliers, and to establish the expectations across a number of key socially important topics, including modern slavery.

## Whistleblowing policy

The whistleblowing policy is proactively communicated to our employees, via our intranet, and supported by compulsory training for all employees.

- Anyone calling our whistleblowing line about a human rights issue, be they an employee, supplier, customer, or other stakeholder, can do so anonymously if they wish and without fear of retaliation. Most referrals come from employees, who choose to come forward openly with their concerns, although we have processes in place to manage anonymous referrals as well.
- All referrals are assessed within seven days of receipt and the in-scope referrals are investigated. Investigations are conducted fairly and impartially and are led by experienced investigators from the Group Financial Crime team or delegated to independent subject matter experts. The scope of each investigation is clearly documented, and procedures are in place to manage confidentiality. Human resources (HR) consultants support

all whistleblowing investigations to enable swift referrals of any welfare concerns. All other concerns are routed through to the appropriate business area or function.

- The Whistleblowing Oversight Committee, which meets quarterly, oversees the effectiveness of the function and the fair treatment of our referrers. The committee is chaired by the Group Chief Risk Officer (who reports to the Group CEO) and includes representatives from HR, legal, audit and non-financial risk. They assess performance using a range of key performance indicators (KPIs) in line with industry peers, and track the timely completion of cases against a 60 working day service level agreement.
- The Whistleblowing Oversight Committee receives reports on all cases which detail the findings and any recommendations. Reports are presented to the Group Board and various other legal entity boards on an annual basis.
- We do not publish data on referrals publicly to protect the confidentiality and anonymity of our referrers.

In the UK, government and charity-led reporting mechanisms can lead to forms of remedy for potential victims of trafficking and slavery. However, we know that this is not necessarily available in other countries at present, so our response should any issue come to light overseas would be tailored specifically to that country and include work on the ground with credible non-governmental organisations, charities and consultants.

We are aware that as a FTSE 100 organisation, we can use our leverage with contractors and suppliers to remedy potential human rights impacts and we will apply that where we can. As a member of Unseen's Business Hub, we will be working with Unseen throughout 2024 to develop our escalation and remediation approach.

# Risk assessment

As a diverse organisation operating across financial services and construction, the risk of modern slavery and human trafficking varies across the business. The following table outlines each of our business units and the corresponding risk profile in terms of modern slavery and human trafficking. This helps us to identify where the highest risks and pressure points are in the business and where extra focus and resources are needed.

High	Medium	Low
<p>The following business units all operate in the construction industry and as a result are classified as high risk.</p> <p>Construction is a high-risk industry with extensive use of self employed, contracted, temporary and irregular labour as well as a relatively high proportion of migrant workers and a mixture of skilled and unskilled labour. Construction also uses a mix of direct contractors and sub-contractors which increases the risk:</p> <ul style="list-style-type: none"> <li>• Affordable Homes</li> <li>• CALA</li> <li>• Inspired Villages</li> <li>• Modular Homes</li> <li>• Real Assets</li> <li>• Urban Regeneration</li> <li>• Suburban Build to Rent</li> </ul>	<p>The following business unit is considered medium risk:</p> <ul style="list-style-type: none"> <li>• Property and Workplaces – building maintenance and management of our offices which includes responsibility for higher-risk services such as cleaning and security.</li> </ul>	<p>The following business units are considered low risk:</p> <ul style="list-style-type: none"> <li>• Group IT – IT service and hardware are low-risk industries. Although often outsourced, IT requires a skilled and educated labour force which is deemed a lower modern slavery risk</li> <li>• Group (non-construction, e.g., human resources, finance, investment management, actuarial, customer service) – products and services procured are from low-risk industries and labour is relatively well paid. This includes roles in business divisions such as Retail, LGIM, LGC and LGRI.</li> </ul>

Our areas of higher risk are in the construction industry and our home building, real estate investment and asset management businesses all operate in this area. Our Real Assets business has circa 200 tier two suppliers in facilities management. This includes roles in security, cleaning, maintenance and landscaping. It is important to highlight these roles alongside the construction roles in this business area given the threat of forced labour and modern slavery in this sector. There are also other roles in our Real Assets' supply chain such as valuers and IT partners, but we consider these low risk given the highly skilled nature of the roles.

In 2023, following a review of our business areas and upon advice from Unseen, we moved Affordable Homes and Suburban Build to Rent from medium risk to high risk. This is in recognition of the fact that they operate in the construction industry.



# Due diligence

## Audits in our supply chain

We understand the importance of undertaking independent audits across the business to uncover any signs of modern slavery and/or labour irregularities. In 2023, we further engaged with Achilles, the supply chain risk analysis organisation, in respect of audits across our offices, Real Assets and CALA. For the first time, Achilles undertook ethical employment audits with two of our main labour suppliers. These unannounced audits took place at the suppliers' offices (in the UK and India) to observe and check against systems and processes. One of the audits also included worker interviews at our office in London. These audits, including worker wellbeing interviews, consider ongoing modern slavery risk further down the supply chain. Please see the case study to the right, 'Audit with a facilities management company' which provides further detail.

## Audit outcomes on managed (outsourced) sites

Twenty-one audits were undertaken on managed live sites in 2023 within our Real Assets business. At one site in the south of England, UK, there were two incidents of concern that were investigated and resolved working with Unseen, contractors and sub-contractors (both incidents at the same site). Please see the case study on page 9: 'Project in the south of England'.

## Audits at CALA sites

Achilles undertook eight ethical audits on CALA sites in 2023. The site audits, all of which were unannounced, covered areas such as rates of pay, recruitment processes and right to work, and payroll methods.

397 worker interviews were conducted with employees of sub-contractors. All worker interviews were anonymous face-to-face interviews with a random sample of employees selected on the day.

## Audit with a facilities management company

One of our suppliers is a facilities management company, which includes the provision of engineers, front of house staff, security and cleaners. The facilities management company provides this service for three of our offices in the UK: London, Hove and Cardiff. On average, 113 contractors from the supplier work across these three offices on any given working day.

### Overview of the audit taken:

- In September 2023, Achilles undertook an ethical employment audit with the facilities management company at their head office and at our London office.
- As well as assessing systems, policies and contracts at the supplier's head-office, Achilles interviewed 22 contractors working in our London office. These individuals were either working directly for our supplier or through sub-contractors.

### What was discovered?

- The overall feeling was that workers were generally happy working at our London office.
- Two findings of concerns were raised:
  - one temporary worker stated they had not received a copy of their contract
  - one temporary worker stated they had worked two additional hours the previous month and had not been paid.

### What actions were taken?

- A detailed investigation, in partnership with our supplier's recruitment partner, was undertaken. This included confirming that every employee on the contract had received a contract.
- The supplier also investigated the number of working hours logged in its system and compared this to the number of hours paid to employees and confirmed that there were no discrepancies.

### What was the outcome?

- Our supplier's recruitment partner confirmed that all temporary workers will receive a contract of assignment depending on how they chose to be paid.
- Our supplier requested its recruitment partner to carry out dip sampling of overtime submission to cross reference that temporary workers have received correct overtime payments.

### What's next?

- We will continue to work with our facilities management supplier to ensure that any risk of modern slavery or labour irregularities within our supply chain is prevented.



## Due diligence continued

The audits found that, in some instances, sub-contractors, could improve their practices to ensure that all workers had written contracts in place and had completed right-to-work checks.

In response to the audit findings, CALA's Modern Slavery Steering Group is working to upskill sub-contractors in respect of modern slavery awareness and practices.

### Recruitment

We recognise the human rights risks that come with hiring individuals, particularly temporary and migrant workers. Within our core Legal & General business in the UK, we see this as low risk given the roles recruited for are predominantly office-based jobs and we often recruit directly. For some roles, we outsource recruitment to one pre-approved recruitment agency which, in turn, manages sub-agencies. This approved recruitment agency undertakes all of our pre-employment screening for new recruits in line with our specific requirements. This includes identity, right to work, criminal, sanctions and fraud checks. All of this enables us to verify the candidate is who they say they are, check their conduct and test their integrity through the declaration of various information and evidence.



## Project in the south of England

### Overview of the site

- The construction site is in the south of England, UK, and managed via an external contractor.
- The construction site is a mix of one main contractor and sub-contractors. The number of workers on-site fluctuates according to the work required in any given week.

### Overview of the audit undertaken

- Unseen undertook an unannounced Worker Wellbeing audit at the site. The aim of this was to get a clear picture of the construction company's processes when it comes to modern slavery and worker wellbeing.
- On a one-day visit, Unseen carried out 10 worker interviews.

### What was discovered?

The following incidents of concern were discovered which related to recruitment and wages:

- recruitment: Unseen was concerned about potential recruitment fees being paid to an individual who was not connected to the main contractor. Unseen was also concerned about the lack of right-to-work checks being undertaken
- wages: the audit found that two workers were giving a percentage of their wages to an individual although it was clear these workers were not being forced to undertake the roles they were doing. There was also a lack of clarity around pay deductions in the event of a worker breaking something on site by mistake.

### What actions were taken?

The following recommendations were made by Unseen and implemented (either by Unseen or the contractor):

#### Recruitment

- ensure all workers have their ID checked against their Construction Skills Certification Scheme card
- ensure contractors are checking that workers are not having to pay anyone for their job
- ensure sub-contractors are reiterating to all workers that no payment should be made for receiving any roles at any sites.

#### Wages

- Unseen spoke directly with the workers, making them aware that a percentage of their pay should not be going to the highlighted individual and provided both workers with Unseen's Modern Slavery & Exploitation helpline number, outlining the support the helpline could provide.

#### Inductions

- all on-site inductions now include content about modern slavery and workers are briefed as to who they should speak to if they have any concerns
- ensure all workers on site know who their supervisor is with the contractor insisting that all supervisors collect their assigned workers directly after the induction.

### What was the outcome:

- The two workers, who were provided with details of Unseen's modern slavery and exploitation helpline to seek help if they wished, worked for one of our sub-contractors: a tier three supplier to Legal & General. Our tier two supplier sought to engage with this sub-contractor to improve labour standards, but the sub-contractor did not engage as hoped. Therefore, our tier two supplier terminated the contract with the sub-contractor. They also found alternative employment and accommodation for both impacted workers who accepted this offer
- Our main contractor (direct supplier) agreed to undertake more audits and workshops about modern slavery to improve their knowledge of the subject.





# Overview of our suppliers

In 2023, across our core UK business, we had a total of 1,957 direct suppliers.

In 2023, our core UK business (excluding subsidiaries) had a total of 1,957 direct suppliers. 64% of our overall supplier spend was with our top 50 suppliers. Within our top 50 suppliers, 26% are based in the technology sector and a further 24% are in professional services – two sectors that are highly skilled and at lower risk of modern slavery.

Our Supplier Management Framework, which includes a Supplier Code of Conduct, sets the obligations and expectations of our supply chain partners. We hold regular discussions with material key suppliers about working standards within the supply chain and, after on-boarding, continue to work with each supplier to drive improvement. All of our supplier contracts stipulate that the organisation should comply with the Modern Slavery Act 2015 if the supplier is in scope of the Act.

If any supplier were to breach the modern slavery clause in their contract with us, and refused to engage with us in resolving any breach capable of being remedied, their contract would be terminated.

In 2024, we will continue to assess and deepen our understanding of our supply chains in order to drive improvement and manage risks.



# Key updates from 2023

## LGIM – our investment management business

Our investment management business is a major global investor with total AUM of £1.2 trillion, of which £378 billion is in strategies explicitly linked to Environmental, Social and Governance criteria. As a global investor, LGIM is committed to respecting and protecting human rights. We believe this is firmly part of our fiduciary duty of managing our clients' assets.

In 2023, we published LGIM's Human Rights [document](#) which outlines the expectations and approach towards human rights issues that we expect of our investee companies. We plan to undertake deeper engagements on human rights in 2024, aiming to implement a new voting policy from 2025.

We joined [Investors Against Slavery and Trafficking Asia Pacific](#), a modern slavery collaborative engagement group, based in Australia, that has been actively engaging on modern slavery issues in the region. We see this as a good opportunity to raise further awareness about the importance of modern slavery and human rights issues in the Asia Pacific region.

## Real Assets

Real Assets, part of our LGIM business division, is one of the UK's largest owner-operators of commercial real assets. The platform is composed of equity and private credit with the equity business including real estate. We have a pivotal role to play in driving positive change through our investment decisions and active engagement with all our key stakeholders – investors, occupiers, borrowers, local communities and partners across our supply chain. The construction and operation workforce across the real estate portfolio is indirect, being appointed by industry specialists on our behalf and we work closely with them to meet their obligations on modern slavery prevention practices.

Real Assets' modern slavery policy, which was developed in 2022, continued to be implemented

on all new construction and building refurbishment projects with costs of more than £1 million.

- We raised further awareness of this policy amongst our consultant project managers at our annual project management conference.
- Our project managers continued to engage and collaborate with main contractors to ensure they recognised their responsibilities for preventing and identifying modern slavery and human trafficking in their projects.
- Twenty detailed modern slavery strategy plans were produced by our main contractors.
- We implemented a more efficient process to electronically collate all the modern slavery strategies, plans and audits submitted by contractors. These are stored on an internal database called Track Record.

In 2023, audits were undertaken on 21 projects. All of these audits were unannounced and included worker interviews. From the audits, two incidents of labour irregularities were found and resolved at a project in the south of England (please see case study in the due diligence section, page 9, for more detail).

We commenced a project with Unseen to further drive these modern slavery strategy plans amongst our smaller projects, by developing a strategy that is proportionate and achievable. This will be further progressed in 2024.

We began a review of existing arrangements with six suppliers who are our managing agents across our assets. Initial plans are to ensure that modern slavery awareness posters, helplines and whistleblowing helplines are visible across our operational assets in the UK. This will include visibility of whistleblowing helplines as well as Unseen's Modern Slavery & Exploitation Helpline. We plan to work with Unseen to progress this in 2024.





## Key updates from 2023 continued



### CALA Homes

CALA Homes is a leading developer of new homes and sustainable communities across the south of England, the Midlands, and Scotland. CALA operates through eight regional offices located throughout the UK, with its main business activities being acquiring land for development and building premium homes. During 2023, CALA undertook the following action in respect of modern slavery:

#### Training and engagement

- CALA maintained a high quality of annual, mandatory employee training about modern slavery which aims to raise awareness of the principal indicators of where someone could have fallen victim to modern slavery.
- As a member of the Gangmasters and Labour Abuse Authority (GLAA), a CALA representative attended seminars to better understand the latest challenges with regard to modern slavery and best practices.

#### Supplier engagement

- CALA continued to engage and collaborate with our suppliers and sub-contractors in respect of our compliance requirements with the Modern Slavery Act and relationship with the workforce on our sites and in our supply chains. This included:
  - ensuring the relevant contractual provisions were included in our contractors' arrangements with sub-contractors, which in turn placed an obligation on sub-contractors to have appropriate anti-modern slavery arrangements in place.
  - operating a sustainable procurement policy and requiring CALA Group suppliers to sign up to its Supplier Code of Conduct. CALA implements the policy and code of conduct by requiring new CALA Group suppliers

to complete an associated questionnaire which covers modern slavery practices. This provides CALA with the opportunity to challenge suppliers' practices should CALA not consider them to be adequate and also emphasises the importance of ensuring effective modern slavery practices are in place.

#### Awareness and support

- CALA continued to display posters and other guidance materials throughout our construction sites to highlight our commitment to preventing modern slavery and to provide a direct helpline (for Unseen and GLAA) as well as our own whistleblowing telephone number.

#### Monitoring for improvements

- CALA continued to analyse its practices, policies, and procedures for overall risk of exposure to modern slavery, and for the development of future actions, so that our business can consistently improve its processes.

## Training

A training module designed to educate colleagues on the risk of modern slavery in workplaces, how to spot potential victims of modern slavery and how to report any instances, was made available to all employees in 2022 and maintained in 2023. For employees in CALA, modern slavery training is mandatory.

To also support our learning and development in this area, we joined the UN Global Compact's Modern Slavery Peer Working Group which provided us with further insight into the modern slavery approach of other organisations. This membership also enabled two colleagues (from Group

Sustainability and Group Procurement) to undertake a six-month course in modern slavery and human rights to enable them to help upskill other colleagues in the business. Becoming a member of Unseen's Business Hub allowed us to seek external counsel and guidance on this topic.

In 2024, we plan to roll out bespoke training for our people who are in roles with higher exposure to modern slavery risks. This will include asset managers, procurement and recruitment teams. As members of Unseen's Business Hub, we have 100 places of training available for employees to undertake in 2024.



## Industry collaboration

We understand that collaboration is vital to tackling modern slavery in businesses and we will continue to work with business peers and industry bodies to help deliver this agenda. Becoming a member of Unseen's Business Hub and joining the UN Global Compact's Modern Slavery Peer Working Group in 2023 helped us engage with, and learn from, business peers.

We are members of the GLAA Construction Protocol. We actively collaborate with industry bodies such as the British Property Federation and participate and collaborate in initiatives such as the Construction Clients Leadership Group.

Collaborations also help ensure all businesses continue to play their part in helping to eradicate modern slavery. Being part of these groups also enables us to support peer businesses, learning from, and challenging, each other.





# Key performance indicators

For 2024, we have developed the following set of targets to be implemented, tracked and measured. Progress will be reported in subsequent updates.

Target	Deadline
<b>Training</b>	
95% of employees* in roles with higher exposure to modern slavery risk (in Legal & General core business) to undertake an in-depth modern slavery awareness course. This includes roles in procurement, recruitment, health and safety, financial crime and Real Assets Development and Asset Managers.	31 December 2024
95% of CALA employees* to undertake a modern slavery awareness course.	31 December 2024
* N.B the figures above are not 100% to take account of employee churn	
<b>Sites</b>	
100% of confirmed cases of modern slavery identified are successfully remediated and reported to GLAA either directly by Legal & General, the relevant subsidiary, or via the appointed contractor, as appropriate.	As required
100% of low-level indicators of labour irregularities (e.g. labour abuse, long unpaid working hours, no minimum wage in place) identified via audits are remediated where possible and referred to HMRC or GLAA as appropriate.	As required
CALA only – 100% of construction sites have communications on site to make clear how to access a whistleblowing system and modern slavery helpline details. This includes posters and via the health and safety briefing.	31 December 2024
Real Assets business only** – 90% of construction sites worth over £3million in contract value to have communications on site to make clear how to access a whistle-blower system and/or modern slavery helpline details. This includes posters and via the Health & Safety briefing (if applicable).	31 December 2024

\*\* In December 2025, this KPI was revised to accurately reflect the intended scope of 'live construction sites with a contract value over £3million' rather than the prior broader scope of 'construction sites'. These sites were also expected to have details of either a whistle-blower system or modern slavery helpline in place – not both. This KPI has been updated to ensure accuracy and alignment with internal reporting criteria.



## Signatories

This statement is made and published in accordance with Section 54 of the Modern Slavery Act 2015.

The boards of the Legal & General entities identified within scope have reviewed and approved this statement. Please see the Appendix for the list of entities in scope. The statement has also been approved by the Board of Legal & General Group Plc on 5 March 2024 and signed by António Simões, CEO, Legal & General Group Plc.



**António Simões**  
CEO, Legal & General Group Plc  
5 March 2024

## Appendix: Scope of Statement

This statement covers the following subsidiary companies of Legal & General Group Plc that are either required to have a statement under the UK Modern Slavery Act 2015 or, in the case of Inspired Villages Group Limited, we have decided to include as best practice.

CALA Group (Holdings) Limited

CALA Management Limited

Inspired Villages Group Limited

Legal & General Affordable Homes (Development 2) Limited

Legal & General Assurance (Pensions Management) Limited

Legal & General Assurance Society Limited

Legal & General Capital Investments Limited

Legal & General Finance Plc

Legal & General Home Finance Limited

Legal & General Investment Management (Holdings) Limited

Legal & General Investment Management Limited

Legal & General Pensions Limited

Legal & General Property Limited

Legal & General Resources Limited

Legal & General Surveying Services Limited

Legal & General Unit Trust Managers Limited

Rowley Lane Borehamwood Limited

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Legal & General Group Plc is a holding company, subsidiary undertakings of which are authorised and regulated by the Financial Conduct Authority and/or Prudential Regulation Authority, as appropriate.

