

## **MODERN SLAVERY ACT 2015: FIRST ACTUARIAL LLP SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction from David Joy, Managing Partner**

We, First Actuarial LLP, are committed to preventing slavery and human trafficking throughout our organisation and supply chains. This statement sets out the actions we have taken to comply with the requirements of the Modern Slavery Act 2015.

### **Our organisation's structure**

First Actuarial is owned by Gallagher, one of the world's leading insurance brokers, risk management and consulting firms. First Actuarial forms part of Gallagher's UK Benefits & HR Consulting division (GBS UK).

GBS UK is a leading provider in the pensions consultancy market, offering a full end-to-end retirement proposition, including actuarial and investment consulting, risk transfer, pensions administration and retirement communications. With experts positioned across all regions, we support pension schemes of all sizes across the full range of solutions.

First Actuarial operates nationally with more than 550 colleagues across seven UK offices. Our focus is on delivering high-quality advice and service at a fair and transparent level of fees

Our annual turnover reached £45 million at the end of our financial year, 31 July 2025.

### **Our business**

Our business is structured into specialised areas and offers a wide range of services, including actuarial consultancy, pension administration, investment advisory, employee benefits consultancy, financial wellbeing and redress. We provide bespoke solutions tailored to the specific needs of more than 600 pension schemes and their sponsoring employers, encompassing both Defined Benefit and Defined Contribution frameworks.

### **Our supply chains**

As a UK-based professional services organisation, we do not operate in any industry where slavery and human trafficking are prevalent.

We carry out necessary due diligence on suppliers, contractors and business partners, and review them appropriately on a periodic basis. In our approach to the necessary due diligence, we will consider the level of risk of slavery and human trafficking within each supplier's industry.

### **Our policies on slavery and human trafficking**

We have appropriate policies in place which underpin our commitment to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our organisation. We periodically review and update all our policies.

Our slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in our organisation and supply chains.

Our policies and working practices promote equal opportunities and diversity, and provide a safe working environment. These policies and working practices include:

- Equal opportunities and dignity at work policy

- Flexible working policy and other family-friendly policies
- Speaking out policy.

### **Due diligence processes for slavery and human trafficking**

We recognise that there are certain countries, industry sectors, products and businesses that are at higher risk of slavery and human trafficking.

Our supplier verification and due diligence processes identify and mitigate risk in our supply chains.

### **Supplier adherence to our values**

We maintain a zero-tolerance policy towards slavery and human trafficking.

Suppliers are expected to adhere to all applicable slavery and human trafficking laws. We will not award or renew business with any supplier that does not meet this expectation.

We have compliance and supplier teams which are responsible for ensuring compliance with our slavery and human trafficking policies.

### **Training**

All staff must read our policies on slavery and human trafficking. Enhanced training is provided to staff involved in our suppliers' processes, as necessary.

### **Our effectiveness in combating slavery and human trafficking**

Compliance with our slavery and human trafficking statement will be monitored by senior management. We will regularly review wider developments in slavery and human trafficking and update our processes, as necessary.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 July 2025. It was approved by the Management Board on 31 March 2026.

**David Joy**  
**First Actuarial LLP**  
**31 March 2026**