

Fidelity Group Modern Slavery Act Transparency Statement

WHO WE ARE

Fidelity Group is proud to be a business with a commercial mind and a customer-centric heart. Fidelity Group designs, implements and manages strategic communications for business. We want to demonstrate our commitment to helping our customers and their communities to thrive and have the best possible chances of enjoying prosperous and healthy futures.

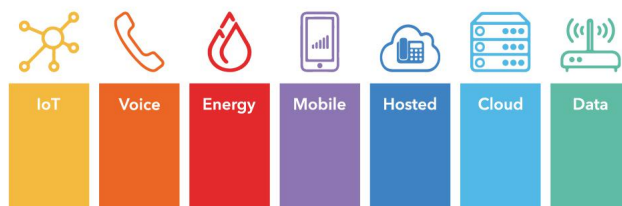
OUR MISSION, VALUES AND BEHAVIOURS

Our Values and Behaviours, of **Loyalty, Trust, Delivery**, embedded in everything we do, define how we operate at Fidelity Group. Our Values describe the way we work and the 'contract' between us, our customers, stakeholders and partners. They underpin everything that we do, and we work with our staff and colleagues to weave them into the fabric of our organisation and working practices.

Our approach to combatting modern slavery and human trafficking is in keeping with our mission and values as well as meeting our legal and regulatory duties. We recognise the detrimental effect Modern Slavery has on global society and we are committed to playing our role in combatting it.

OUR PEOPLE/WORK PRACTICES

We are committed to being an employer of choice and this is reflected in our values. We are proud to provide a safe place to work with terms and conditions that meet or exceed minimum legal requirements.



OUR CUSTOMERS AND COMMUNITIES

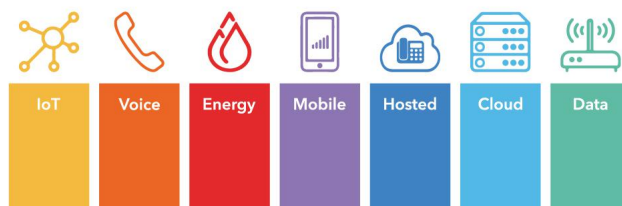
We are committed to our responsibilities in safeguarding children and adults at risk. We want all of our staff and contractors to be alert to the signs of abuse and neglect, including modern slavery and human trafficking offences. We also recognise the importance of our customers and communities being alert to potential offences as a key part of tackling slavery. In 2017 and beyond we will:

- Raise awareness with our staff and customers around modern slavery and human trafficking offences so our people are alert to potential offences and know how to respond; and
- Develop training for all of our staff and volunteers on Modern Slavery.

OUR SUPPLY CHAIN

At Fidelity Group, we are committed to ethical procurement. As part of this, we are committed to ensuring our supply chain is free from modern slavery. In 2017 we will:

- Communicate our anti-slavery stance to all existing suppliers
- Update our procurement procedures and standard contract terms to reflect our anti-slavery stance
- Develop an assurance scheme so we can check the anti-slavery initiatives implemented by our suppliers
- Train our contract managers so they are alert to potential risks and can react quickly and appropriately
- Fully investigate any alleged activity that is inconsistent with our anti-slavery stance; and
- Where an unacceptable practice is found, we will work with the supplier to remedy this. Where the breach is severe or not remedied in an appropriate timeframe, we will seek to terminate our relationship with that supplier.



OUR POLICIES

Our policy environment supports our anti-slavery stance. Key policies include:

- Our Whistleblowing policy which enables staff to report any concerns they have
- Our HR policies which create an environment in which staff rights and dignity are respected
- Our Health and Safety policies which set out our position on ensuring a safe workplace; and
- Our tenancy management policies which set out the action to be taken where our properties are used for unlawful purposes.

This statement is made under section 54 (1) of the Modern Slavery Act 2015 and reflects the Fidelity Group position on Modern Slavery for the 2016/17 financial year. This statement covers Fidelity Group Ltd and all legal entities that form part of it.