



# 2022 Modern Slavery and Human Rights Statement

# Contents

This Statement was approved by the Phoenix Group Holdings plc Board of Directors on 12 August 2022 in accordance with Section 54, Part 6 of the Modern Slavery Act. It sets out the steps taken across our Group in the financial year ending 31 December 2021 to help prevent modern slavery in our operations, supply chain and in our role as an investor. A list of entities included in this Statement can be found on pages 14 to 16.

Signed on behalf of the Board



**Andy Briggs**  
Group Chief Executive Officer  
12 August 2022

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# An introduction from our CEO

“

We are fully committed to playing a leading role in supporting and driving the global effort to eradicate slavery and human rights abuses.”



At Phoenix we recognise that human rights and modern slavery are critical and challenging issues that impact vulnerable people. These issues are often exacerbated by unprecedented global events, impacting workforces in the UK and around the world.

As the UK's largest long-term savings and retirement business, responsible for managing over £310 billion of assets on behalf of our 13 million customers, and employing over 8,000 people, we have the size and commitment to make a real difference to both our customers and society. This means we can make a genuine and lasting positive impact not only in our direct operations, but in our role as an investor on behalf of our customers and clients, and in our supply chain.

As a business, we recognise our responsibility to respect not only those who work within Phoenix but across our supply chain and wider network, including people in the communities we serve. We have zero tolerance to slavery, human trafficking, child labour and, indeed, any abuse of human rights. We are committed to being a responsible business in all our affairs and relationships.

We are taking clear action across our areas of impact – requiring our suppliers to achieve our environmental, social and governance ('ESG') supply chain standards, training colleagues within our direct operations on modern slavery and human rights abuses, and joining the UN-supported Principles for Responsible Investment ('UN PRI') Advisory Committee on Social Issues and Human Rights. We are continually reviewing and improving our practices and know we have more to do.

We are fully committed to playing a leading role in supporting and driving the global effort to eradicate slavery and human rights abuses.

**Andy Briggs**  
Group Chief Executive Officer

40m

people are in modern slavery across the world<sup>1</sup>

c.16m

people worldwide are estimated to be in forced labour in the private sector<sup>1</sup>

<sup>1</sup> [www.ilo.org/global/publications/books/WCMS\\_575479/lang-en/index.htm](http://www.ilo.org/global/publications/books/WCMS_575479/lang-en/index.htm)

# Putting modern slavery and human rights into context

## What is modern slavery?

It is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.<sup>1</sup>

It is a crime under the UK Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after (human trafficking).

Human trafficking and forced labour are both forms of modern slavery. They sometimes overlap but they are not the same.<sup>2</sup>

[Read the UK Modern Slavery Act 2015 here →](#)

## What are human rights?

They are what every individual is entitled to in order to live a life of fundamental welfare, dignity and equality, including:

### Civil and political rights

Rights to life, freedom from harassment and discrimination, privacy, and freedom of expression.

### Labour rights

Rights to collective bargaining, and freedom from forced labour and the worst forms of child labour.

### Economic, social and cultural rights

Rights to work, social security, food, housing and education.

<sup>1</sup> [gov.uk/government/publications/modern-slavery-and-public-health](https://www.gov.uk/government/publications/modern-slavery-and-public-health)

<sup>2</sup> [ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/childvictimsofmodernslaveryintheuk/march2022](https://ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/childvictimsofmodernslaveryintheuk/march2022)

# Our business

## Who we are

Phoenix Group is the UK's largest long-term savings and retirement business.

We offer a broad range of pensions and savings products to support people across all stages of the savings life cycle.

### Our vision

To grow a strong and sustainable business to help more people on their journey to and through retirement.

Our purpose drives everything we do:

**Helping people secure a life of possibilities**

## Our key consumer brands

### Open business brands

**Standard Life**  
Part of Phoenix Group

**SunLife**  
Part of Phoenix Group

### Heritage business brands

**PHOENIX LIFE**  
Part of Phoenix Group

**ReAssure**  
Part of Phoenix Group

## Our business

**c.£310bn**  
total assets under  
administration

**c.13m**  
customers

**c.8,000**  
colleagues

**FTSE 100**  
and FTSE All World

**c.1,600**  
suppliers

**£17.0bn**  
of estimated cash  
that will emerge  
from our current  
in-force business

## Our values



### Growth

We grow our business through finding new ways to develop our expertise and innovate.



### Passion

We are passionate about understanding and acting on what's important to our customers, colleagues and society.



### Responsibility

We build trust by taking accountability and empowering others to do the right thing.



### Courage

We're ambitious in the challenges we solve and we always speak up.



### Difference

We collaborate across boundaries and embrace difference to deliver the best customer and colleague outcomes.

# Our commitment and approach to combatting modern slavery and supporting human rights

We believe that Phoenix Group has a significant opportunity to make a difference in creating the sustainable future we all want. We are committed to raising awareness and implementing targeted activity to combat the harms and violations of the rights of people impacted throughout our business, including our investments and supply chain. Our commitment starts from protecting and respecting human rights and taking action to prevent slavery and human trafficking in all its forms. To measure and monitor our approach, we have set a series of targets across 2021 and 2022.

In this Statement we set out our policies and training, our approach as a responsible investor, our modern slavery supply chain strategy, and our targets.

<sup>1</sup> Key suppliers include: strategic (those that we work closely with due to the strategic nature of the services they provide); critical (suppliers where the goods or services provided are limited in the market and barriers to change are complex); and financially important with spend  $\geq$  £1m (suppliers which are numerous but where value to Phoenix Group is significant).

## Progress in 2021

### Policies and training

We have rolled out training for procurement, operational and relationship manager colleagues through live, interactive training sessions and via an online webinar. We have trained approximately 200 procurement colleagues on modern slavery identification and action.

### Our role as an investor

We published a Group stewardship policy and joined the UN PRI Advisory Committee on Social Issues and Human Rights, which will focus on salient modern slavery issues within the mining and renewable energy sectors.

### Our supply chain

Through our modern slavery supply chain strategy, we have been working to ensure our suppliers have best practice strategies in place to combat modern slavery and are reporting transparently on their progress.

In December, we published an industry-first open letter to all current and future suppliers and partners, and wrote directly to our strategic and critical suppliers. The letter makes our expectations clear that all partners and suppliers are expected to implement a plan to tackle and report on modern slavery and that we expect this to be evidenced through a modern slavery external disclosure which meets industry best practice.

We have made clear that we will give preference to current or prospective suppliers that already have these requirements in place and are managing this through our supplier assessments and due diligence, and in our procurement onboarding.

An independent supply chain risk assessment is underway, including a focus on modern slavery, to determine where suppliers have a higher risk of modern slavery in their business.

We rolled out a set of supply chain standards with a clear focus on modern slavery (see page 12) to our key suppliers<sup>1</sup>, who represent approximately 80% of our spend. In addition, we have begun to include modern slavery clauses in the contracts of our key and high-risk suppliers.

We also met a target for 95% of key suppliers to publish a Modern Slavery Statement.

## Our commitment and approach to combatting modern slavery and supporting human rights *continued*

### Our targets:

#### By the end of 2021:

95%

of our key suppliers publish a Modern Slavery Statement (achieved 96%)

75%

of our key suppliers complete their gap analysis against our ESG Supply Chain Standards (achieved 84%)

#### By the end of 2022:

95%

of our key **and high-risk** suppliers publish a Modern Slavery Statement

95%

of invited colleagues complete our modern slavery training

75%

of our key suppliers have completed their action plans to meet our ESG Supply Chain Standards

### Looking forward

We recognise that there is more we can do to fulfil our role within society and meet the needs of our stakeholders, so during 2022 we are:

#### Policies and training

Carrying out an independent review of our policies and approach to managing human rights and modern slavery across the Group.

Rolling out further training to colleagues on modern slavery identification and action, including modules on our Supplier Code of Conduct.

#### Our role as an investor

Further embedding human rights and modern slavery considerations into the investment process, including engaging with companies at the centre of material controversies relating to human rights.

#### Our supply chain

Continuing to embed modern slavery standards into our supply chain focusing on our key and high-risk suppliers, requiring them to meet our standards by the end of 2022. This includes embedding relevant modern slavery clauses within contracts. We are also developing a modern slavery audit readiness assessment of our supply chain.

# Our policies and training

We have a set of policies that help us manage the risk of modern slavery and human rights issues, encourage ethical behaviours, and promote decent working practices across our business and supply chain.

## Group policies

### Code of Conduct

Our Code sets out the behaviours and standards we expect from all our colleagues; whatever their role and wherever they work. It exemplifies the culture of Phoenix Group as a whole – the combined values, purpose and ambitions that make up our identity. Within the Code, we highlight our zero tolerance approach to modern slavery and commitment to tackling the issue.

[Read our Code of Conduct here →](#)

### Sustainability Risk Policy

This sets our minimum operating standards for the management of sustainability risk throughout Phoenix Group. It is designed to provide a framework and a system of control standards related to ESG governance, workplace issues, identification of external stakeholder issues, identification and management of ESG risks, and integration and interaction with the local community.

### Anti-bribery Statement

We have a zero tolerance to bribery and corruption in all its forms. We are committed to acting fairly and ethically in all countries in which we operate and so comply with all anti-bribery and corruption law in all markets and jurisdictions where we do business, including the Bribery Act 2010. We expect the same standards from all third parties that provide services for Phoenix Group and its subsidiary companies.

[Read our Anti-bribery Statement →](#)

### Diversity and Inclusion Policy

This policy defines our expected standards for how we engage with individuals, teams, suppliers, partners, and communities across four pillars – gender, ethnicity, disability and social mobility – to create a culture of inclusion and belonging.

“

We have a zero tolerance to bribery and corruption in all its forms and are committed to acting fairly and ethically in all countries in which we operate.”



## Our policies and training continued

### Supplier policies

#### Supplier Code of Conduct

This sets the standards and principles we require our suppliers to follow and that we expect them to demand from their own supply chains. This includes meeting the standards and obligations in the UK Modern Slavery Act 2015; respecting the human rights of their employees and complying with all relevant legislation, regulations and directives in the countries and communities in which they operate; and upholding as a minimum, commitments relating to the four core International Labour Organization ('ILO') standards.

[Read our Supplier Code of Conduct →](#)

#### Supplier management model

Our model details the high standards and principles required of our suppliers and that we expect them to demand from their supply chains. It includes outsourced arrangements covering several supplier categories and oversight of our business processes.

#### Sourcing and Procurement Policy

Our policy requires that all colleagues understand potential risks related to any sourcing activity and supplier management, including modern slavery and human rights.

### Training

To raise awareness amongst our employees and suppliers of both modern slavery and the Speak Up arrangements available to them to report any issues or concerns, these topics are highlighted in our Codes of Conduct. All our employees are required, at least annually, to confirm that they have read and agree to abide by its principles.

We have rolled-out training for key business areas, procurement, and supplier relationship management colleagues through live, interactive training sessions via an online webinar. We have also mandated Supplier Code of Conduct training throughout the commercial partnerships team to ensure that they are aware of and understand these obligations.

“

We have rolled-out training for key business areas, procurement, and supplier relationship management colleagues through live, interactive training sessions via an online webinar.”

# Our role as an investor

## Investing in a sustainable future

As the UK's largest long-term savings and retirement business, we are responsible for managing over £310 billion of assets on behalf of our 13 million customers. Our customers and shareholders trust us to reflect their priorities in how we invest. That means keeping their money safe and providing them with strong long-term financial returns, while using our scale to play our part in delivering a secure and sustainable future. That is why we are integrating consideration of ESG issues into our investment decision-making process.

## Integration

Over the course of 2021 we continued to review and enhance how we integrate ESG considerations into our investment decision-making processes.

As an active asset owner, we recognise the need to strengthen our focus on human rights and align our practices with the United Nations Guiding Principles on Business and Human Rights ('UNGP'). In 2022, we will develop a Phoenix Group Human Rights policy which will inform our approach as an employer, procurer and investor.

Active ownership is critical to the delivery of our ambitions and to meet our sustainable investment commitments. As a large asset owner, we recognise our stewardship responsibilities and adopt an 'engagement first' approach with the objective of using our position of influence to bring about corporate change.

In 2021 we adopted a Group Stewardship Policy that details our approach. We believe this is an ambitious policy which raises expectations for stewardship within the industry.

[Read our Group Stewardship Policy here →](#)

## Collaboration

In addition to our stewardship activity, we are committed to being an active investor in collaborative engagements.

We are signatories of the UN PRI. During 2021 we joined the UN PRI Advisory Committee on Social Issues and Human Rights. The initiative will focus on salient modern slavery issues within the mining and renewable energy sectors. We are committed to collaborating with the UN PRI and to leading its coalitions.

## Looking forward

We will continue to strengthen and evolve our stewardship activity throughout 2022 and beyond. Priority areas include:

- Human rights – participating in the PRI Advisory Committee on Social Issues and Human Rights to shape a new collaborative engagement and joint efforts with peers to address the most salient human right issues in key sectors and geographies.
- UN Global Compact Principles – engaging with companies at the centre of material controversies in the areas of human rights, labour, environment and anti-bribery and corruption.

“

Active ownership is critical to the delivery of our ambitions and to meet our sustainable investment commitments.”

# Our supply chain

We want to work with partners and suppliers that share our commitment to tackling modern slavery and human rights abuses, and are supporting them to adopt best practice standards. Our strategy focuses on these key areas:

## Industry-first ESG open letter to suppliers

All existing and future suppliers are expected to meet the requirements of the letter as a minimum, including the development of a programme to tackle modern slavery, training and report their progress through an external disclosure. We make clear we will give preference to new suppliers and partners that already meet the requirements.

[Read our ESG open letter to suppliers here](#) →



We give preference to new suppliers and partners that already meet the requirements.”

## Independent supply chain risk assessment

An independent supply chain risk assessment is underway, with a focus on modern slavery. Suppliers deemed to be at high risk for climate change and/or modern slavery are required to meet our supply chain standards, including a disclosure on the progress they are making on tackling modern slavery in their business.



## Supplier Code of Conduct

We expect all suppliers to meet the Supplier Code of Conduct standards.



## Modern slavery supply chain standards

Our modern slavery supply chain standards, a subset of Phoenix Group's ESG supply chain standards, were rolled out to key suppliers<sup>1</sup> in 2021. A main target is for 95% of key suppliers to publish a Modern Slavery Statement. This was met in 2021. We have been working with our suppliers to go beyond compliance and require them to meet best practice standards on modern slavery and transparent disclosure. In 2022, suppliers deemed to be at high risk of having modern slavery due to where they operate, the sector they are in and/or what they produce (covering over 80% of our spend) will also be expected to meet the standards. We have requested that our key suppliers create an action plan to meet the standards by the end of 2022.

# 95%

of key suppliers<sup>1</sup> to have a modern slavery statement. This target was met in 2021.

## Training

We are providing modern slavery and human rights supply chain training for our procurement and supplier relationship colleagues, and require our key and high-risk suppliers to develop a similar programme. We have trained over 200 colleagues to date and have a target to ensure 95% of those invited to complete training do so by the end of 2022.



## Modern slavery and human rights embedded in supplier contracts and due diligence

Modern slavery requirements are embedded in the supplier due diligence assessment and are being integrated into the supplier contract clauses as contracts come up for renewal, and as new contracts are signed for key and high-risk suppliers.

<sup>1</sup> Key suppliers include: strategic (those that we work closely with due to the strategic nature of the services they provide); critical (suppliers where the goods or services provided are limited in the market and barriers to change are complex); and financially important with spend ≥ £1m (suppliers which are numerous but where value to Phoenix Group is significant).

## Our supply chain continued

### ESG supply chain standards in focus

Phoenix Group's ESG supply chain standards have a clear focus on modern slavery and human rights and have been designed to take suppliers on a journey to sustainability best practice, tailored to the criticality to our business and/or the risk assessment of the sector and region where they operate.

All strategic, critical and financially important suppliers (with spend over £1m), and any additional high-risk suppliers (determined from the independent supply chain risk assessment) are required to meet these standards.

These standards are being reviewed in 2022. Updates will be made to harmonise our human rights policies across the Group and reflect these updates in the standards required of our suppliers.

“

Our ESG supply chain standards have been designed to take suppliers on a journey to sustainability best practice.”

### Modern slavery and human rights supply chain standards extract:

- ✓ **Active management of human rights and modern slavery risks** in their own organisation and in their supply chain.
- ✓ **Provide training** for both internal colleagues and high-risk suppliers on human rights and modern slavery.
- ✓ **Zero tolerance for child labour** throughout the supply chain, and employment of young workers adheres to UK regulations regardless of location.
- ✓ **Comply with the UK Modern Slavery Act 2015** (applicable if turnover is over £36m) or meet the local equivalent standard/Act, ILO standards, UK Human Rights Act 1998 and Equality Act 2010 or local equivalents.
- ✓ **Meet UK Modern Slavery Act 2015 best practice** as outlined in Modern Slavery Statement requirements and best practice.
- ✓ **Support freedom of association** and the effective recognition of the right to collective bargaining.

[Read Modern Slavery Statement requirements and best practice here →](#)

## Our supply chain continued

### Supply chain risk assessment and due diligence in focus

We have a risk-based approach to assess the potential of modern slavery and human rights violations in our supply chain and have rolled out our modern slavery supply chain standards to suppliers included in the Group's supplier management model.

A detailed independent supply chain risk assessment commenced in 2021 to determine where the risks are in our supply chain. The key and high-risk suppliers (80% of our spend and approximately 75 suppliers), and those deemed to have an elevated risk of modern slavery, will be required to demonstrate that they meet our modern slavery supply chain standards.

Key suppliers were required to complete a gap analysis by the end of 2021 and provide a detailed action plan by the end of 2022 that addresses the gaps identified in their current activity. In 2022, high-risk and new key suppliers are being informed of the requirement to meet the standards.

We will continually assess the risk of modern slavery and human rights abuses and look to improve our approach to tackling this critical issue, including joining and participating in cross-industry collaboration.

### Supporting suppliers

We want to support our supply chain in developing transparent practices on tackling modern slavery.

Clear guidance has been given to suppliers that are not meeting the requirements of the UK Modern Slavery Act and we have offered help with establishing a programme and governance to manage the issues and develop an appropriate statement.



#### Living Wage

Ensuring that people earn a wage which is enough to live on is the right thing to do, not only for ourselves but also for our partners. We were proud to announce that we extended the payment of the Real Living Wage to include those regularly contracted through our supply chain and operating at our UK sites, alongside our ongoing commitment to all colleagues directly employed by Phoenix Group. We believe this will have a positive impact on our partnerships and in the communities in which we operate.

### Our due diligence approach

Our due diligence approach is outlined below and includes steps to escalate cases and eliminate risk.

#### Route one

Our due diligence guidelines require any potential supplier with an annual turnover in excess of £36m to have a published Modern Slavery Statement. We require those suppliers to meet UK Modern Slavery Act 2015 best practice.

#### Route two

Strategic and critical suppliers, financially important suppliers and high-risk suppliers with spend over £1m and an annual turnover below £36m are required to provide a copy of their Modern Slavery Statement for review prior to their appointment. Once on board they must also meet the Supplier Code of Conduct.

#### Route three

Additional reviews are conducted when material changes increase the risk profile.

#### Treatment

If there are any indications that modern slavery is taking place within our supply chain, we will take appropriate steps to eliminate risk.

# Appendix: List of Phoenix Group entities

Company name	Country	Company number
103 Wardour Street Retail Investment Company Limited	GB	9291187
3 St Andrew Square Apartments Limited	GB	SC108543
330 Avenida de Aragon SL	ES	B82829391
Abbey Life Assurance Company Limited	GB	710383
Abbey Life Trust Securities Limited	GB	843568
Abbey Life Trustee Services Limited	GB	1451364
Alba LAS Pensions Management Limited	GB	SC060928
Alba Life Trustees Limited	GB	SC31475
Axial Fundamental Strategies (US Investments) LLC	US	4386668
BA (FURBS) Limited	GB	3365953
BL Telford Limited	GB	151731
Britannic Finance Limited	GB	3588089
Britannic Group Services Limited	GB	2090476
Britannic Money Investment Services Limited	GB	2171236
Brixton Radlett Property Limited	GB	5071726
Century Trustee Services Limited	GB	1905318
CH Management Limited	US	4762852
Cityfourinc	GB	3871807
Clyde Gateway Management Company Limited	GB	SC609746
ERIP General Partner Limited	GB	6416546
ERIP Limited Partnership	GB	LP012555
G Life H Limited	GB	960516
G Assurance & Pension Services Ltd	GB	2150733
G Financial Services Limited	GB	1035097
G Trustees Limited	GB	2030135
G Park Management Company Limited	GB	06878047
Gallions Reach Shopping Park (Nominee) Limited	GB	05777118
Iceni Nominees (No. 2) Limited	GB	04266393
IH (Jersey) Limited	JE	109362
Impala Holdings Limited	GB	6306909
Impala Loan Company 1 Limited	GB	SC212709
Inesia SA	LU	B66 931
Inhoco 3107 Limited	GB	5188136
London Life Limited	GB	1179800

Company name	Country	Company number
London Life Trustees Limited	GB	934044
National Provident Institution	GB	ZC000065
National Provident Life Limited	GB	3641947
NM Life Trustees Limited	GB	1860464
NM Pensions Limited	GB	4240147
Northampton General Partner Limited	GB	5607362
NP Life Holdings Limited	GB	3725026
NPI (Printworks) Limited	GB	3950816
NPI (Westgate) Limited	GB	3939272
Phoenix (Barwell 2) Limited	GB	3943463
Phoenix (Chiswick House) Limited	GB	3943490
Pearl (Covent Garden) Limited	GB	4152541
Pearl (Martineau Phase 1) Limited	GB	3775168
Pearl (Martineau Phase 2) Limited	GB	3775171
Phoenix (Moor House 1) Limited	GB	3950821
Phoenix (Moor House 2) Limited	GB	3943371
Pearl (Moor House) Limited	GB	4209012
Phoenix (Printworks) Limited	GB	3693948
Phoenix (Stockley Park) Limited	GB	3938357
Pearl (WP) Investments LLC	US	4299734
Pearl AL Limited	GB	SC4348
Pearl Assurance Group Holdings Limited	GB	3245996
Pearl Customer Care Limited	GB	3947540
Pearl Group Holdings (No. 1) Limited	GB	3524909
Pearl Group Holdings (No. 2) Limited	GB	5282342
Pearl Group Management Services Limited	GB	3588063
Pearl Group Secretariat Services Limited	GB	3588041
Pearl Group Services Limited	GB	5549998
Pearl Life Holdings Limited	GB	4560778
Pearl MP Birmingham Limited	GB	4002164
Pearl Private Equity LP	GB	SL024593
Pearl RLG Limited	GB	4560770
Pearl Strategic Credit LP	GB	SL024592
Pearl Trustees Limited	GB	2665203

## Appendix: List of Phoenix Group entities continued

Company name	Country	Company number
Phoenix ULA Limited	GB	928046
PG Dormant (No 4) Limited	GB	1565099
PG Dormant (No 5) Limited	GB	1621367
PG Dormant (No 6) Limited	GB	165018
Phoenix Group Management Services Limited	GB	10691596
PGH Capital Public Limited Company	IE	537912
PGMS (Glasgow) Limited	GB	SC159852
PGMS (Ireland) Holdings Unlimited Company	IE	341950
PGMS (Ireland) Limited	IE	342705
PGS 2 Limited	GB	3725038
Phoenix Advisers Limited	GB	4339390
Phoenix & London Assurance Limited	GB	894616
Phoenix AW Limited	GB	1225468
Phoenix Customer Care Limited	GB	3315193
Phoenix ERI Limited	GB	10196658
Phoenix ER2 Limited	GB	10196579
Phoenix ER3 Limited	GB	10844152
Phoenix ER4 Limited	GB	11121610
Phoenix ER5 Limited	GB	11720413
Phoenix ER6 Limited	GB	12139423
Phoenix Group Capital Limited	GB	5447500
Phoenix Group Holdings	KY	202172
Phoenix Group Holdings plc	GB	11606773
Phoenix Group Management Ltd	GB	4002195
Phoenix Life Assurance Europe dac	IE	684882
Phoenix Life Holdings Limited	GB	6977344
Phoenix Pension Scheme (Trustees) Limited	GB	1912908
Phoenix Pensions Trustee Services Limited	GB	1967589
Phoenix SCP Limited	GB	4013361
Phoenix SCP Pensions Trustees Limited	GB	2404622
Phoenix SCP Trustees Limited	GB	SC108046
Phoenix SL Direct Limited	GB	586343
Phoenix SPV1 Limited	GB	11418551

Company name	Country	Company number
Phoenix SPV2 Limited	GB	11418573
Phoenix SPV3 Limited	GB	11418612
Phoenix SPV4 Limited	GB	11418621
Phoenix Wealth Holdings Limited	GB	3223752
Phoenix Wealth Trustee Services Limited	GB	2155360
Pilängen Logistik AB	SE	556991-7031
ReAssure Two Limited	GB	777895
ReAssure Pension Trustees Limited	GB	1800078
Reassure UK Life Assurance Limited	GB	676139
ReAssure FSH UK Limited	GB	7717278
ReAssure PM Limited	GB	985480
ReAssure LL Limited	GB	1397655
ReAssure Nominees Limited	GB	489153
ReAssure FS Limited	GB	116551
ReAssure Group plc	GB	11597179
ReAssure Companies Services Limited	GB	6705828
ReAssure Life Pension Trustees Limited	GB	1538109
ReAssure Midco Limited	GB	2970583
ReAssure Trustees Limited	GB	1767383
Scottish Mutual Assurance Limited	GB	SC133846
Scottish Mutual Nominees Limited	GB	SC78057
Scottish Mutual Pension Funds Investment Limited	GB	SC61343
SL (NEWCO) Limited	GB	SC297006
SL Liverpool Limited	GB	2529609
SLA Belgium No. 1 SA	BE	BE0638.954.836
SLA Denmark No. 1 ApS	DK	38330896
SLA Denmark No. 2 ApS	DK	40115919
SLA Germany No. 2 S.a r.l.	LU	B198324
SLA Germany No. 3 S.a.r.l	LU	B199656
SLA Germany No. 1 S.a r.l.	LU	B186141
SLA Ireland No. 1 Sarl	LU	B191411
SLA Netherlands No. 1 B.V.	NL	60700793
SLACOM (No. 10) Limited	GB	SC271362

## Appendix: List of Phoenix Group entities continued

Company name	Country	Company number
SLACOM (No. 8) Limited	GB	SC271358
SLACOM (No. 9) Limited	GB	SC271360
SLIF Property Investment GP Limited	GB	SC388872
Standard Life Agency Services Limited	GB	SC170047
Standard Life Assets and Employee Services Limited	GB	SC593510
Standard Life Assurance (HWPF) Luxembourg S.a.r.l.	LU	B186108
Standard Life International dac	IE	408507
Standard Life Investment Funds Limited	GB	SC068442
Standard Life Master Trust Co. Limited	GB	09497864
Standard Life Mortgages Limited	GB	14120174
Standard Life Private Equity Trust plc	GB	SC216638
Standard Life Property Company Limited	GB	SC101362
Standard Life Trustee Company Limited	GB	SC076046
SunLife Limited	GB	5460862
The Heritable Securities and Mortgage Investment Association Limited	GB	SC000668
The London Life Association Limited	GB	41503
The Pathe Building Management Company Limited	GB	9267935
The Pearl Martineau Galleries Limited Partnership	GB	LP006989
The Pearl Martineau Limited Partnership	GB	LP006988
The Phoenix Life SCP Institution	GB	SZ000005
The Scottish Mutual Assurance Society	GB	SZ000015
The Standard Life Assurance Company of Europe BV	NL	33.272.024
UK Commercial Property Estates Holdings Limited	GG	52248
UK Commercial Property Estates Limited	GG	53361
UK Commercial Property Estates (Reading) Limited	GB	8800500
UK Commercial Property Finance Holdings Limited	GG	60016
UK Commercial Property GP Limited	GG	45385
UK Commercial Property Holdings Limited	GG	45386
UK Commercial Property Nominee Limited	GG	45400
UK Commercial Property REIT Limited	GG	45387
Vebnet (Holdings) Limited	GB	00792165
Vebnet Limited	GB	SC207389
Welbrent Property Investment Company Limited	GB	04617102

Company name	Country	Company number
The Gresham Life Assurance Society Limited	GB	39345
PA (GI) Limited	GB	71805
Phoenix Life Assurance Limited	GB	1419
Pearl Group Management Services Limited	GB	3588063
Pearl Group Services Limited	GB	5549998
Phoenix Life Limited	GB	1016269
Pearl Group Management Services Limited	GB	3588063
Pearl Group Services Limited	GB	5549998
Phoenix Life Limited	GB	1016269
Phoenix Unit Trust Managers Limited	GB	3588031
Phoenix Wealth Services Limited	GB	2238458
SunLife Limited	GB	5460862
Standard Life Assurance Limited	GB	SC286833
Standard Life Pension Funds Limited	GB	SC046447
Standard Life Lifetime Mortgages Limited	GB	SC193441
ReAssure Limited	GB	754167
ReAssure Life Limited	GB	1363932
ReAssure UK Services Limited	GB	7860886

Country code	Country
BE	Belgium
KY	Cayman Islands
DK	Denmark
GG	Guernsey
IE	Ireland
JE	Jersey
LU	Luxembourg
NL	Netherlands (the)
ES	Spain
SE	Sweden
GB	United Kingdom of Great Britain and Northern Ireland (the)
US	United States of America (the)



#### Contact us

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#### News and updates

In line with our sustainability programme and our commitment to reduce our environmental impact, you can view key information on our website

**[thephoenixgroup.com](http://thephoenixgroup.com)**

#### Registered address

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London

EC4M 7AN

Registered number 11606773