



Phoenix Group 2023 Modern Slavery Statement

Phoenix Group Holdings plc

Contents

This Statement was approved by the Phoenix Group Holdings plc Board on 4th of May 2023 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 2022 to help prevent modern slavery in our operations, supply chain and in our investment portfolio. A list of entities included in this Statement can be found on pages 12 to 14.

Signed on behalf of the Board



Andy Briggs
Group Chief Executive Officer

14th June 2023

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An introduction from our CEO

At Phoenix, we recognise that modern slavery, forced labour, servitude and human trafficking are severe violations of fundamental human rights. We are committed to our responsibility to respect human rights and align with the United Nations Guiding Principles on Business and Human Rights (‘UNGPs’). This Modern Slavery Statement (MSS) outlines our progress in 2022 to prevent modern slavery and human trafficking in our organisation and outlines our ongoing commitment to do more.

As the UK’s largest long-term savings and retirement business, responsible for managing £259 billion of assets on behalf of our 12 million customers, and employing over 6,500 people, we strive to be an uncompromising force for both people and planet. We acknowledge that 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.

In 2023, we published our first human rights policy which details our commitment and ambition to protect and respect human rights. We recognise that our activities could potentially have direct and indirect impacts on human rights through our operations and value chain. Through completion of a high-level saliency scan in 2022, we have identified that we should prioritise conducting thorough analysis of human rights issues associated with our supply chain and investments as part of our due diligence process to better understand and address saliency issues in our value chain and plan to commence this work in 2023.

We understand our responsibility to respect not only those who work within Phoenix but across our value chain, including the communities we serve. We have zero-tolerance to slavery, human trafficking, child labour and any abuse of human rights.

We are taking clear action across our areas of impact – requiring our suppliers to achieve our ESG Supply Chain Standards, training colleagues within our direct operations on modern slavery and human rights abuses. 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 respect human rights.



Andy Briggs
CEO

“

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



Putting modern slavery 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 exploitation¹.

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 same².

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

1 Modern slavery and public health – GOV.UK (www.gov.uk)

2 Child victims of modern slavery in the UK – Office for National Statistics (ons.gov.uk)

Modern slavery in the UK

In 2022, the National Referral Mechanism (NRM) received 16,938 referrals of potential victims of modern slavery, which represents a 33% increase in referrals compared to the preceding year (12,706). This year saw the highest number of annual referrals since the NRM began in 2009³.

3 Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2022 - GOV.UK (www.gov.uk)

What are human rights?

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Everyone is entitled to these rights without discrimination. They include a wide range of protections and freedoms, including social, labour, economic, cultural, civil, political, and environmental rights⁴.

4 Human Rights | United Nations

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 business

£259bn

total assets under administration

c.12m

customers

c.6,800

colleagues as at 1 March 2023

FTSE 100

and FTSE All World

c.£6.4bn

market capitalisation as at 1 March 2023

£12.1bn

of Group in-force long-term free cash to emerge from our current in-force business

Our family of brands

Standard Life
Part of Phoenix Group

SunLife
Part of Phoenix Group

PHOENIX LIFE
Part of Phoenix Group

ReAssure
Part of Phoenix Group

Our values



Growth

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



Passion

We're 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.



Overview of our supply chain

Our total supplier spend in 2022 was £770m. Our partners and suppliers are diverse in the type of services and products they provide and the size of their businesses.

Our suppliers include strategic partners who are subsidiaries of the world's leading IT services, business solutions organisations, and suppliers who provide facilities management services, including catering and cleaning services.

Our key partners and suppliers⁵

- Business Process Outsourcing (BPO) service partners (providing policy administration and cloud-based solutions)
- IT Suppliers (including IT platform and service providers such as ICT equipment used in our offices)
- Fund Accounting Services (including fund administration)
- Investment Management Relationships (including asset managers managing our assets under administration)
- Rating and Data Services (organisations providing market data)
- HR suppliers (including recruitment specialists and payroll and workforce management solutions)

In total we currently have approximately 1,870 suppliers who are mostly based in the UK. Due to limited visibility of our current supply chain, in 2022 we engaged suppliers directly to effectively gauge modern slavery risks. We will continue with direct supplier engagement on these issues, and we are currently undergoing an extensive exercise to improve data integrity and increase visibility of our supply chain. As a result, it is likely that our supply chain geographical footprint is much more far-reaching. The initial phase of this supply chain mapping exercise has established that we have a global footprint beyond the UK, with suppliers based in Canada, France, Ireland, India, Mauritius, Spain, and USA.

Key takeaways

1,870

approximately 1,870 suppliers who are mostly based in the UK

£770m

Total supplier spend in 2022

⁵ Key suppliers are strategic (those that we work closely with due to the strategic nature of the services they price), critical (suppliers where the goods or services provided is limited in the market and barriers to change are complex) and operational (suppliers which are numerous but where value to Phoenix is significant)



Our commitment and approach to combatting modern slavery

Our commitment starts from protecting and respecting human rights and taking action to prevent modern slavery in all its forms

We are ambitious in our desire to lead the way in respecting human rights and recognise our responsibility to do this in accordance with:

- The International Bill of Human Rights.
- The International Labour Organization's (ILO) Core Conventions.

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. To measure and monitor our approach, we have set a series of targets across 2023 and beyond.

In this statement we set out our due diligence process, risk assessment, our approach as a responsible investor, our modern slavery supply chain strategy, policies and training, and our targets.

Our policies

We are committed to embedding consideration of human rights including modern slavery across our organisation. We have a set of policies that help us manage the risk of modern slavery and human rights issues, encourage ethical behaviours, promote decent working practices across our business and supply chain and our commitment to remediation.

Our suppliers are required to read and agree to our Supplier Code of Conduct and support the stretching standards set out within the ESG Supply Chain Standards.

Human Rights Policy

Our Human Rights Policy sets out our commitment to respect human rights and align with the United Nations Guiding Principles on Business and Human Rights ('UNGPs') across our operations, supply chain and investment portfolio.

[Read the full policy here →](#)

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 – including the 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 the Code of Conduct →](#)

ESG Supply Chain Standards

Our ESG Supply Chain Standards codify the expectations previously set out in our Open Letter to suppliers and build on the minimum standards on modern slavery set out in our Supplier Code of Conduct. They outline our detailed expectations for our key and high-risk suppliers, as well as tailored standards for small and medium-sized enterprises around implementing a programme and governance to manage modern slavery and cascade these obligations across their supply chain, while adhering to our broader human rights standards.

[Read the full policy here →](#)

Sustainability Risk Policy

This sets the 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.



Our commitment and approach to combatting modern slavery continued

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 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 who provide services for the Phoenix Group and its subsidiary companies.

[Read our full statement here →](#)

Diversity and Inclusion Policy

This policy defines our expected standards for how colleagues 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.

Supplier Code of Conduct

Sets the standards and principles we require our suppliers to follow, and what 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 Organisation (ILO) standards.

[Read our full statement here →](#)

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.

Stewardship Policy

In 2021, we published a Group Stewardship Policy that details our approach to stewardship and our commitment to support effective engagement. We believe this is an ambitious policy which raises expectations for stewardship within the industry.

[Read our policy here →](#)

Risk Assessments

During 2022, we commissioned a high-level saliency scan by an independent third party to identify and assess our potential salient human rights issues that should be prioritised for further action. The scan primarily focused on risks within our operations; however, it also provided an overview of possible risks associated within our supply chain and investment portfolio.

The ongoing management of our suppliers is determined by our Third-Party Management Model (TPMM, previously Supplier Management Model). The TPMM defines the appropriate degree of oversight based on supplier ESG risk, including modern slavery, and their criticality to our business. The TPMM examines a supplier's risk and performance, a process which is managed by our supplier relationship managers and supported by both our modern slavery and human rights subject matter experts (SME).

Our saliency assessment highlighted forced labour and child labour as two of the eight principal human rights issues in our supply chain, based on the nature of outsourced and contracted work and geographies. Owing to the general evaluation criteria of a saliency assessment, modern slavery risks are often considered as high priority because of the inherent high impact and severity on rights holders regardless of likelihood.

In 2022, limited visibility of our supply chain meant that we were reliant on supplier engagement to effectively assess modern slavery risks. We are currently undergoing an extensive exercise to increase the visibility of our supply chain and improve the quality of supplier data, including supplier spend and categories of spend aligning with Phoenix Group's supplier taxonomy within our procurement and finance tools. This is to allow us to better gauge risks related to suppliers and enhance our risk assessment and management approach overall. Once the data is in place for tier one suppliers, we will build out the data across remaining tiers and look to undertake a modern slavery risk assessment of our extended supply chain. Our current undertakings have provided us with a good baseline to identify and engage with high risk and material suppliers on modern slavery, in terms of our key providers.



Our commitment and approach to combatting modern slavery continued

Human Rights Due Diligence

Our saliency scan determined that Phoenix should prioritise conducting a thorough analysis of human rights issues associated with our supply chain and investments as part of our due diligence process to better understand and address salient issues in our value chain.

We are committed to further develop our procedures to include human rights and modern slavery considerations through conducting group wide human rights due diligence at least every three years.

Phoenix Group’s approach to new supplier onboarding involves assessing the service the supplier is providing to ascertain the level of modern slavery risk associated with the supplier and the service. All new suppliers go through our due diligence process by completing our Third-Party Assurance Assessments, which includes specific questions on whether the supplier publishes a Modern Slavery Statement and how the Statement meets the requirements of the Modern Slavery Act 2015. The sourcing and procurement and supplier relationship teams engage the subject matter expert on modern slavery and human rights within Phoenix Group during this process. The SME will advise on assessment results and supplier risk profile on a case-by-case basis. Moving forward, we will be doing capacity building exercises to upskill supplier relationship managers and procurement colleagues to be able to assess, understand and manage suppliers’ modern slavery risks.

Our supply chain

In 2022, we launched a new ESG strategy for our supply chain to reinvigorate our commitment to best practice and build a sustainable supply chain. This includes establishing sustainable sourcing and procurement process to tackle modern slavery during the supplier selection, onboarding, and management process and by engaging with the modern slavery and human rights SME throughout.

We want to work with partners and suppliers who share our commitment to tackling modern slavery and human rights abuses and are supporting them to adopt best practice standards. We have a comprehensive Supplier Code of Conduct and ESG Supply Chain Standards, as detailed in the policy section, which sets out the standards and principles we require them to follow.

Our investment portfolio

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 environmental, social and governance (ESG) issues including human rights into our investment decision making process.

Our Phoenix Group human rights policy outlines our commitment to protect and respect human rights in our investment portfolio. As an asset owner we endeavour, where appropriate, to align with the OECD Guidelines for Multinational Enterprises, a set of responsible business conduct standards for multinational enterprises.

In order to proactively manage human rights risks across our investments, we are committed to evolve our approach to access to data and continue to seek accurate information from a wide range of sources on an ongoing basis. Equally, we intend to implement investment portfolio due diligence to identify salient human rights impacts and act on any findings through direct, collaborative, or delegated engagement by our asset management partners.

Grievance mechanisms and access to remedy

Phoenix is committed to building a strong remedy ecosystem to ensure access to remedy for adverse impacts associated with our operations, activities and business relationships.

Our stakeholders can seek access to remedy for perceived modern slavery impacts through various channels. Our external whistle-blowing service, ‘Speak Up’ is free, confidential and available to all stakeholders 24hours a day, every day of the year.

In cases where we may be associated with an adverse human right impact, we will investigate the situation and assess our involvement in the harm to determine our responsibility to provide for, contribute to, and use leverage to secure remedy for those who have been harmed.

Training

We have an extensive modern slavery e-learning module, to support our colleagues understanding of the types of modern slavery, the key signs to look out for, as well as how to prevent it, tackle it and report it. We have made this training available to all of our employees.

To raise awareness of modern slavery and our Speak Up line our employees are trained on our Code of Conduct. At least annually, all of our employees are required to confirm that they have read and agree to abide by its principles.

During 2022, we provided bespoke modern slavery and human rights training incorporating the most recent global estimates on modern slavery and regulations to the procurement team. Our trainings specifically covered what modern slavery means for our type of supply chain, in the UK and globally and what we can do to identify, prevent, and mitigate modern slavery risks. We have delivered this training to our procurement colleagues in the business who are responsible for overseeing the sourcing and procurement of new suppliers and renewal of existing suppliers.

“
Speak Up is free, confidential and available to all stakeholders”



Our targets and progress

In 2023, the number of suppliers within scope for our modern slavery targets have increased by approximately 127% since 2022.

This is due to the fact we have integrated ESG risks into our TPMM which has resulted in an increased number of key suppliers entering the model from a governance perspective. In addition, our new targets will also apply to high-risk suppliers in 2023⁶.

6 We evaluate a suppliers' modern slavery risk via our internal ESG risk assessment methodology which is also integrated into our TPMM. We analyse our suppliers from a risk-based approach to determine if they are at a higher-risk of modern slavery by analysing the supplier's sector, category, and geographical impacts via various publicly available data sources.

7 We will collaborate with our top 25 suppliers to ensure they are taking proactive measures to tackle modern slavery. We will do this via a tailored engagement programme built on our understanding of the modern slavery risks associated with the supplier's industry and geographical locations, deliver supplier workshops, and share best practice guidance on tackling modern slavery.

8 We will continue to work with our key and high-risk suppliers to complete an Action Plan against our new stretching standards set out in the ESG Supply Chain Standards. We will assess and review evidence of how their organisation is tackling modern slavery in their supply chain and support them on their journey.

By the end of 2022:

95%

Of our key suppliers publish a modern slavery statement

Achieved: 96% of our key suppliers published a modern slavery statement

95%

Of invited procurement colleagues complete our bespoke modern slavery training

Achieved: 100% of our invited colleagues completed our modern slavery training

75%

Of our key suppliers have completed their action plans to meet our ESG supply chain programme

Achieved: 75% of our key suppliers completed their action plans around modern slavery

By the end of 2023:

75%

Of our key and high-risk suppliers to publish an updated modern slavery statement annually

95%

Of invited colleagues from procurement, sourcing, and supplier relationship management to undergo bespoke mandatory modern slavery training

In addition, we will continue to roll out high-level modern slavery awareness training across the business.

95%

Of our top 25 suppliers by spend to actively tackle modern slavery⁷.

In addition, we will continue to work alongside our key and high-risk suppliers to support them with working towards our stretching standards on modern slavery, as set out in our ESG Supply Chain Standards⁸



Our targets and progress continued

Our progress in 2022

Policies and training

In 2023, we published our first group-wide human rights policy which details our commitments and alignment to the UNGPs across our business.

Our supply chain

- ESG Supply Chain Standards: We developed a set of new standards for our key and high-risk suppliers and tailored standards for small and medium-sized enterprises on modern slavery and human rights in line with international standards and best practices.
- Supplier engagement and collaboration on combating modern slavery: Prioritised key partners and suppliers and high-risk suppliers based on the sector and country analysis of modern slavery risks for close engagement. This involved raising awareness of modern slavery risks in global supply chains and Phoenix Group's expectations from our partners and suppliers on complying with the Modern Slavery Act 2015.

- Supplier Action Plans: We developed Action Plan templates for our key suppliers to complete to understand what actions our suppliers are currently taking to identify and address modern slavery and other human rights issues in their own operations and supply chain. This includes information on how they're conducting due diligence in their supply chain and cascading modern slavery standards to their suppliers and evidence to demonstrate.
- Procurement partnership: We also prioritised procurement colleagues for engagement on our ESG strategy and initiated a Procurement and ESG Working Group in 2022 to support with the operationalisation of ESG effectively within sourcing decisions and processes. This included aligning on new due diligence questions and processes, as well as the development of the new ESG Supply Chain Standards on modern slavery.

Looking forward

We recognise that there is more we can do to fulfil our role within society and meet the needs of our stakeholders. During 2023, we will undertake the following:

Policies and Processes

We will further develop existing policies and procedures to include human right considerations. We will adapt and make relevant changes to our risk universe to ensure group-wide awareness and adherence to our human rights policy and modern slavery statement.

We have developed a roadmap to address gaps in our alignment to the UNGPs and we are committed to closing these within the next three years.

Grievance mechanisms

We are committed to assessing our existing internal and external grievance channels to strengthen our approach to ensure that they align with the UNGPs effectiveness criteria and building a strong remedy ecosystem.

Our supply chain

In 2023 the number of key suppliers within scope for our modern slavery targets has increased by approximately 127%. This is due to an increased number of key suppliers entering the TPMM model from an ESG governance perspective and high-risk suppliers in 2023 vs the number of suppliers we had in 2022.

- We will continue to ensure our key and high-risk suppliers are publishing an annual modern slavery statement in accordance with the UK Modern Slavery Act requirements.
- Deliver bespoke mandatory modern slavery training to key colleagues in procurement, sourcing, and supplier relationship management and, continue to roll out high-level modern slavery awareness training to other colleagues across the business. We also commit to ensuring our trainings are up to date and reflect global trends and regulatory changes.
- We will collaborate with our top 25 suppliers by spend to actively tackle modern slavery via a tailored supplier engagement programme and continue to work alongside our key and high-risk suppliers to support them with working towards our stretching standards on modern slavery as set out in our ESG Supply Chain Standards.



Appendix: List of Phoenix Group entities

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

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
Barnwood Properties Limited	GB	600319
BL Telford Limited	GB	151731
Britannic Finance Limited	GB	3588089
Britannic Group Services Limited	GB	2090476
Britannic Money Investment Services Limited	GB	2171236
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 Assurance & Pension Services Ltd	GB	2150733
G Financial Services Limited	GB	1035097
G Life H Limited	GB	960516
G Park Management Company Limited	GB	06878047
G Trustees Limited	GB	2030135
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

Company name	Country	Company number
Inhoco 3107 Limited	GB	5188136
Laurtrust Limited	GB	2306074
London Life Limited	GB	1179800
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
NP Life Holdings Limited	GB	3725026
NPI (Printworks) Limited	GB	3950816
NPI (Westgate) Limited	GB	3939272
Pearl (Covent Garden) Limited	GB	4152541
Pearl (Martineau Phase 1) Limited	GB	3775168
Pearl (Martineau Phase 2) Limited	GB	3775171
Pearl (Moor House) Limited	GB	4209012
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	10691596
Pearl Group Secretariat Services Limited	GB	3588041
Pearl Group Services Limited	GB	5549998
Pearl Life Holdings Limited	GB	4560778
Pearl Private Equity LP	GB	SL024593
Pearl RLG Limited	GB	4560770
Pearl Strategic Credit LP	GB	SL024592
Pearl Trustees Limited	GB	2665203
PG Dormant (No 4) Limited	GB	1565099
PG Dormant (No 5) Limited	GB	1621367
PG Dormant (No 6) Limited	GB	165018



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DK	Denmark	NL	Netherlands (the)		
GG	Guernsey	ES	Spain		
IE	Ireland	SE	Sweden		

Company name	Country	Company number
PGMS (Glasgow) Limited	GB	SC159852
PGMS (Ireland) Holdings Unlimited Company	IE	341950
PGMS (Ireland) Limited	IE	342705
PGS 2 Limited	GB	3725038
Phoenix & London Assurance Limited	GB	894616
Phoenix (Barwell 2) Limited	GB	3943463
Phoenix (Chiswick House) Limited	GB	3943490
Phoenix (Moor House 1) Limited	GB	3950821
Phoenix (Moor House 2) Limited	GB	3943371
Phoenix (Printworks) Limited	GB	3693948
Phoenix (Stockley Park) Limited	GB	3938357
Phoenix Advisers Limited	GB	4339390
Phoenix AW Limited	GB	1225468
Phoenix Customer Care Limited	GB	3315193
Phoenix ER1 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 (Bermuda) Limited	BM	202201537
Phoenix Group Holdings plc	GB	11606773
Phoenix Group Management Ltd	GB	4002195
Phoenix Group Management Services Limited	GB	3588063
Phoenix Holdings (Bermuda) Limited	BM	202201539
Phoenix Life Assurance Europe dac	IE	684882
Phoenix Life Holdings Limited	GB	6977344
Phoenix Management Services (Bermuda) Limited	BM	202201541
Phoenix Management Services Holdings (Bermuda) Limited	BM	202201538
Phoenix Pension Scheme (Trustees) Limited	GB	1912908

Company name	Country	Company number
Phoenix Pensions Trustee Services Limited	GB	1967589
Phoenix Re Limited	BM	202201542
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
Phoenix SPV2 Limited	GB	11418573
Phoenix SPV3 Limited	GB	11418612
Phoenix SPV4 Limited	GB	11418621
Phoenix ULA Limited	GB	928046
Phoenix Wealth Holdings Limited	GB	3223752
Phoenix Wealth Trustee Services Limited	GB	2155360
Pilängen Logistik AB	SE	556991-7031
ReAssure Companies Services Limited	GB	6705828
ReAssure FS Limited	GB	116551
ReAssure FSH UK Limited	GB	7717278
ReAssure Group plc	GB	11597179
ReAssure Life Pension Trustees Limited	GB	1538109
ReAssure LL Limited	GB	1397655
ReAssure Midco Limited	GB	2970583
ReAssure Nominees Limited	GB	489153
ReAssure Pension Trustees Limited	GB	1800078
ReAssure PM Limited	GB	985480
ReAssure Trustees Limited	GB	1767383
ReAssure Two Limited	GB	777895
Reassure UK Life Assurance Limited	GB	676139
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



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DK	Denmark	NL	Netherlands (the)		
GG	Guernsey	ES	Spain		
IE	Ireland	SE	Sweden		

Company name	Country	Company number
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
SLACOM (No.8) Limited	GB	SC271358
SLACOM (No.9) Limited	GB	SC271360
SLF of Canada UK Limited	GB	6704581
SLFC Services Company UK Limited	GB	6997417
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
Sun Life Assurance Company of Canada (UK) Limited	GB	959082
Sun Life of Canada UK Holdings Limited	GB	2939726
SunLife Limited	GB	5460862
The Gresham Life Assurance Society Limited	GB	39345
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	LPO06989

Company name	Country	Company number
The Pearl Martineau Limited Partnership	GB	LPO06988
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 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

Contact us

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www.thephoenixgroup.com/site-services/email-alerts

if you're a partner or supplier and would like to discuss our standards and implementation of these, get in touch with the Phoenix Group ESG Supply Chain team on:
esgsupplychain@corp.standardlife.com

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