



DEBTCo

DEBTCo UK SOLUTIONS LIMITED MODERN SLAVERY POLICY

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Table of Contents

1	Policy Statement	4
2	Purpose	4
3	Scope	4
4	The Modern Slavery Act 2015	4
5	Commitments	5
6	Slavery and Human Trafficking Statement	6
7	Training & Awareness	7
8	Raising a Concern	7
9	Related Policies	7
10	Responsibilities	8

1 POLICY STATEMENT

DebtCo UK Holding Limited (*hereinafter referred to as the “Company”*) is committed to eradicating any form of slavery and human trafficking within its business and supply chains. We comply with the requirements of The Modern Slavery Act 2015 (‘Act’) and where applicable, have made available our slavery and human trafficking statement.

The Company has a zero-tolerance policy towards slavery, servitude, forced labour and/or human trafficking and we work hard to assess and monitor all business relationships and employees to ensure fair and respectful treatment for all.

2 PURPOSE

The purpose of this policy is to document how the Company identifies, assesses and prevents slavery and human trafficking within its business operations and activities. It is the company's aim to eradicate any form of modern slavery and we have published a slavery and human trafficking statement which details the measures, controls and actions taken by the Company to this end.

Employees and third parties are provided with access to this policy and the associated statement so that they understand our obligations and commitments under The Modern Slavery Act 2015. Our commitments for eradicating modern slavery are detailed in this policy and are reviewed and monitored regular for compliance and effectiveness.

3 SCOPE

This policy applies to all staff within the Company (*meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Company in the UK or overseas*). Failure to adhere to the objectives and measures in this policy may result in disciplinary action being taken.

4 THE MODERN SLAVERY ACT 2015

The Modern Slavery Act 2015 was passed into UK law in March 2015 and aims to prevent and eradicate slavery, servitude, forced labour and/or human trafficking within the workplace and the supply chains of companies.

Certain organisations are required to publish a slavery and human trafficking statement for each financial year. This statement provides information on the steps and measures taken by the organisation to identify, risk assess and prevent slavery and human trafficking within its business operations.

5 COMMITMENTS

The Company does not condone or tolerate any form of slavery or human trafficking, either within its own business operations or within its supply chain. We take a multi-faceted approach to eradicating modern slavery and have robust processes and controls for risk assessments and due diligence so that we know who we are working with and how they operate.

We have a suite of employment and human resources policies in place to ensure that our organisation is a fair, equal, ethical and respectful place to work. Employees are encouraged to adopt our commitments to equality for all and are provided with the training and support needed to embed this into their duties and work ethic.

We work closely with all suppliers and third parties and expect them to maintain the same high level of standards and commitments that we have in regard to preventing slavery and human trafficking. We do not work with any organisation who supports or is knowingly involved in forced labour, servitude, slavery or human trafficking.

We carry out due diligence and risk assessments on every part of our supply chain and ensure that suppliers' operations and business practices are ethical and lawful. ***The Company adheres to the below commitments: -***

- The Company has a duty and legal obligation to comply with The Modern Slavery Act 2015 and follows the below objectives in its aim to eradicate slavery and human trafficking.
- The Company has an effective Slavery and Human Trafficking Policy in place which is reviewed annually and disseminated to all employees
- The Company has published its Slavery and Human Trafficking Statement on our website and will provide a written version to any person requesting it.
- To have a robust due diligence program in place to verify, assess and monitor all employees, suppliers, and customers.
- To carry out an annual risk assessment of the Company's business activities, services, and supply chains to identify any vulnerabilities or risks associated with slavery or human trafficking.
- To maintain a suite of employment and HR policies to ensure that all employees are treated fairly, ethically, and equally.
- To provide staff with reporting lines to raise any concerns and to disseminate the Whistleblowing Policy to all employees.
- To assess all existing contracts and ensure that we are working alongside all suppliers to risk assess and eradicate modern slavery.
- To use the Home Office's Modern Slavery Assessment Tool where applicable to support our existing risk assessment procedures and controls.

- To provide employees with appropriate training and support about slavery and human trafficking.
- To have effective outsourcing and procurement processes in place that take into consideration the risks posed by modern slavery.
- Where the Company has any concerns about suspected or actual slavery or human trafficking offences, we will take immediate and decisive action to investigate and report the findings to the appropriate body.

6 SLAVERY AND HUMAN TRAFFICKING STATEMENT

The Company recognises that under the Act, commercial organisations that supply goods or services, carry on business in the UK and meet the annual turnover threshold of £36m or more are required to publish an annual slavery and human trafficking statement.

Despite the fact the Company does not fall within this criteria, we have still drafted and implemented a statement that has been made available on our website. We also provide a written copy of the statement to any person requesting it.

The statement provides the steps the Company has taken during the last financial year to ensure that slavery and human trafficking are not taking place within any of our supply chains or in our own business operations.

The statement details are based on the last financial year and include information about: -

- The Company's structure, business activities and supply chains.
- Our policies and procedures as they relate to slavery and human trafficking.
- Our due diligence processes as they relate to slavery and human trafficking for: -
 - the Company and its business activities
 - our employees
 - our suppliers and supply chains.
- Risk assessments of our business and supply chains where there is a risk of slavery and human trafficking taking place and any steps we have taken to assess and manage those risks.
- The measures, controls, and effectiveness the Company has in ensuring that slavery and human trafficking is not taking place within our business or supply chains.
- The support, training and resources made available to all employees in relation to identifying and preventing slavery and human trafficking.

The Company has ensured that the appropriate person(s) and/or boards have approved and signed the statement prior to it being published.

7 TRAINING & AWARENESS

The Company recognise that an effective employee training program around slavery and human trafficking is essential for awareness and understanding. The Company includes the slavery and human trafficking legislation and obligations within our standard induction training program for all new employees.

Existing employees attend an annual workshop covering all employment and HR legislation and regulations. We are committed to ensuring that our employees understand the risks and areas of vulnerability as they relate to our business and industry.

We have a zero-tolerance policy and approach towards slavery and human trafficking and aim to protect our employees by providing information and support. Employees are made aware of how to raise a concern or issue and are provided with a copy of the company Whistleblowing Policy which provides guidance on reporting certain behaviours and suspicions.

This policy together with our Slavery and Human Trafficking Statement are disseminated to all employees, and they are provided with access to external guidance and information on The Modern Slavery Act 2015. We operate an open and inclusive workplace environment and encourage all employees to raise concerns should they have any.

8 RAISING A CONCERN

Employees are advised of the reporting lines for concerns or issues and are provided with a copy of the Whistleblowing Policy. Where any employee has a concern or issues relating to breaches or factors associated with The Modern Slavery Act 2015, they can discuss these with their line manager or human resources representative.

For further information, employees can contact: -

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9 RELATED POLICIES

The processes and measures that our Company has in place to identify and prevent slavery and human trafficking encompass a suite of business and employment policies. These are noted below and should be read in conjunction with this policy.

- Anti-Bribery & Corruption Policy
- Equal Opportunities & Diversity Policy
- Equal Pay Policy

- Whistleblowing Policy
- Recruitment & Selection Policy
- Procurement Procedures
- Due Diligence Policy
- Risk Assessment Policy
- Outsourcing & Supplier Policy
- Disciplinary & Grievance Policy
- Bullying and Harassment Policy

10 RESPONSIBILITIES

It is the responsibility of all employees to prevent and identify any risks associated with slavery and human trafficking within the workplace and supply chains. All employees and suppliers are encouraged to report any concerns using the appropriate reporting lines.

The Company is committed to complying with The Modern Slavery Act 2015 and has a zero-tolerance policy towards modern slavery of any kind. Our commitments and objectives to this end are fundamental to our business and are embraced by all employees. All managers are aware of their duties and obligations under this policy and its association with the related policies detailed in above.