

## **The Provident Financial plc statement on the Modern Slavery Act 2015**

*This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Provident Financial plc and its operating companies during the year ending 31<sup>st</sup> December 2019, to prevent the possibility of modern slavery and human trafficking occurring within its direct operations and supply chains. All information and data provided below is based on the 2019 financial year unless otherwise stated.*

### **Our business**

Provident financial plc and its operating companies (“the Group”) is a specialist non-standard lending group which operates across the United Kingdom (UK) and Republic of Ireland (ROI).

The total number of people employed by the Group across its three divisions as at 31 December 2019 stood at 4,854. Collectively, these people serve 2.3 million customers in the UK and ROI. Vanquis Bank is a supplier of credit cards and loans in the non-standard credit market and has operations in Bradford, London and Chatham, Kent. The Consumer Credit Division (CCD), which operates under the Provident home credit and Satsuma brands, is headquartered in Bradford, with 120 branches across the UK and ROI. The third division, Moneybarn, is a non-standard vehicle finance company and has operations in Petersfield, Hampshire.

The Group is opposed to slavery and human trafficking in both its direct operations and in the indirect operations of its supply chains. As such, the Group will not knowingly support or do business with any organisation involved in slavery or human trafficking. This commitment is underpinned by the Group’s corporate policy on procurement and outsourcing and the Group’s corporate diversity, equality and inclusion policy which endorses the United Nation’s Universal Declaration of Human Rights and International Labour Organisation’s core standards. Other corporate policies, which support this commitment include the Health and Safety Policy, Whistleblowing Policy, Bribery Policy and Human Resources Policy.

### **Our supply chains**

In 2019, the Group’s revenue was £2.2bn and its annual procurement spend was £237.6m. Most of the Group’s tier one suppliers are based within the UK and ROI. These suppliers range in size and scale from small and medium-sized enterprises, to large multinational corporations. The highest area of spend for the Group is on professional services such as credit card platforms, credit checking services and consultancy and legal fees. Other areas of high spend include IT licenses, advertising, and property rent and service charges.

All of the Group’s operating companies have established supplier due diligence processes and procedures to manage supply chain-based risks and ensure suppliers comply with the Group’s policy requirements and meet legislative requirements including those that relate to the Modern Slavery Act 2015. In Vanquis Bank, CCD and Provident Financial plc, new suppliers are assessed for the types of potential risks they pose and are sent questionnaires covering issues such as data protection, information security, operational resilience, regulatory compliance and corporate responsibility (CR). Responses are assessed by subject matter experts. The CR questionnaire is sent to all materially important suppliers and includes establishing if the supplier’s turnover exceeds £36m and if so, to attach links to their modern slavery policy. If the supplier’s turnover is less than £36m they are asked to outline the processes they have in place to prevent instances of modern slavery and human trafficking arising in their supply chain and their direct operations.

### **The Group’s direct operations**

In order to minimise the risk of modern slavery or human trafficking occurring within the direct operations of the Group (ie through the staff that are employed by the Group’s operating companies), a range of HR processes and procedures are in place. Each of the Group’s operating companies is required to collect evidence which shows that: the person being hired is the person they claim to be; the prospective colleague has the right to work legally in the UK; the person has permission to do the type of work that is being offered to them and that they are not a criminal. This evidence is assured by conducting checks using information held on the National Fraud

Database and by credit reference agencies, as well as through the carrying out of criminal record and driving licence checks. Prospective colleagues are also required to provide proof of 'right to work' documents in line with the Immigration, Asylum and Nationality Act 2006 and original photographic documents, for example, a valid passport. Colleagues are also encouraged to raise concerns relating to potential breaches of regulations, policy requirements and/or other grievances, either by contacting a line manager or by telephoning the Group's whistleblowing helpline 'Safecall' which is a 24-hour helpline operated by an independent third party to ensure impartiality and confidentiality.

### **Our plans for the future**

The Group has developed a broad understanding of the areas within its businesses that require further focus to identify potential risks which relate to modern slavery and human trafficking. To ensure that there is a high level of staff awareness of issues relating to modern slavery and human trafficking, particularly within the Group's procurement and partnerships teams, the Group will continue to seek to harmonise the due diligence processes and procedures used by the Group's operating companies to manage supply chain-based risks, providing training where appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act and has been approved by the Provident Financial plc board of directors and will be reviewed and updated at least annually.

Malcolm Le May  
Chief Executive Officer  
Provident Financial plc

March 2020