



MODERN SLAVERY STATEMENT 2018

Where we use **we**, **us**, or **Lowell** in this statement, we mean Lowell Financial Ltd (company number 04558936) on behalf of itself and each of the following UK companies:

- Lowell Portfolio I Ltd Company number 04857418
- Lowell Solicitors Limited Company number 08647091
- Fredrickson International Limited Company number 02679522
- Simon Bidco Limited Company number 09709443
- Metis Bidco Limited Company number 07652466

This is Lowell's second slavery and human trafficking statement published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the work that we have undertaken to develop our systems and processes to increase transparency and eradicate the risk of modern slavery in our business and throughout our supply chains since we published our first [modern slavery statement](#).

Our business

We conduct all of our business in a fair, honest and ethical manner – this is at the heart of all we do and underpins our mission to make credit work better for all. Our commitment to and appreciation of the impact of ethics across our business is reflected in our gold rating from Investor in Customers for the fourth year running and our IIP Champion rating from Investors in People.

We serve the credit management value chain across a range of sectors, specialising in three business areas:

- **Debt purchase**

We buy customer accounts from businesses in a range of sectors like financial services, retail, telecoms and utilities, and apply our customer-focused approach to help people find affordable, sustainable ways to pay back what they owe.

- **Third party collections**

We provide specialist collections services for other businesses. This is particularly useful for businesses where collecting payments is not central to their day-to-day operations. By understanding our clients and supporting their customers, we help them focus on what they do best while protecting their reputation.

- **Business services**

We also offer a range of other business and technology solutions for clients to help them work better.

Lowell also includes Lowell Solicitors which is a specialist law firm providing industry leading litigation and debt recovery services. It recovers outstanding debts through the courts when all other efforts have failed and there is reasonable reason to believe the consumer has the means to pay.

As our business grows and develops, the clients we work with will change. However, our clients, which include some of the largest and most respected companies in the UK, continue to be drawn from a wide range of organisations including banks, retailers and credit card, mobile phone, home shopping and utility (gas, electricity and water) companies.

Our colleagues

Working at Lowell is about collectively pursuing our mission and making a real difference for clients, consumers, the economy and society as a whole – raising living standards for everyone.

We employ over 1,700 people in Leeds and Tolworth and each one of our colleagues is important to us and create the culture that drives our business. We have a clear commitment to connect, communicate, develop, involve and recognise our colleagues – that is Lowell's People Promise.

We comply with all relevant legislation relating to colleague terms and conditions. We are an equal opportunities employer and offer salaries above the National Living Wage, quality linked incentive schemes and annual bonuses which are regularly reviewed by our Reward team to ensure they remain competitive. We promote good working practices and conditions as well as the general wellbeing of our colleagues through a number of initiatives. We also focus on the development of our colleagues through a combination of internal training, development and mentoring programmes, external training programmes, apprenticeships and sponsorship of professional qualifications.

Working with our suppliers

We require all of our contractors and suppliers, most of whom are UK or EU-based, to work to the same high standards that we apply to our own business. We carry out due diligence on all new suppliers and require our existing suppliers to complete self-assessment questionnaires annually. We also have a supply chain oversight programme which monitors our suppliers' compliance with their obligations and where appropriate this involves Lowell carrying out detailed desktop assessments and site visits.

We have carried out a risk assessment of our key existing direct suppliers and categorised them as posing a high, medium or low risk of modern slavery taking place in their business:

- 82% of our suppliers were categorised as low risk
- 18% of our suppliers were categorised as medium risk
- none of our suppliers were categorised as high risk

Additional due diligence has been completed on one-third of our medium risk suppliers and the remaining medium risk suppliers will be subject to further due diligence over the next 12 months.

We have developed specific anti-slavery provisions which are being incorporated into our contractual arrangements with new suppliers where appropriate. Contracts with existing suppliers will be amended to incorporate these provisions where appropriate as and when they come up for renewal.

We will continue to review, update and improve our procurement processes, including our risk assessment, due diligence and oversight of our suppliers in the coming year.

Our policies

We have a number of policies in place which support our anti-slavery work, including our procurement policy, speak up policy (which is our whistleblowing policy), equal opportunities policy, recruitment policy, anti-bribery policy and corporate social responsibility policy.

In particular, our speak-up policy encourages colleagues to report any concerns about malpractice or wrongdoing. We also work with an independent third-party provider to provide colleagues with an additional option to raise potential issues and to ensure that they feel able to do so on an anonymous basis. We are committed to the highest possible standards of openness, probity and accountability and we expect our colleagues and others that we deal with, who have serious concerns to come forward and voice those concerns.

We are in the process of drafting our anti-slavery policy which will be adopted and implemented as soon as possible.

Objectives and key performance indicators

Our objectives for the next 12 months are to:

- putting in place an appropriate anti-slavery policy and providing training to staff on the key points
- reviewing and updating our supplier risk assessment procedures to improve our ability to identify and assess potential areas of risk, particularly in relation to modern slavery, in our supply chains
- carrying out additional due diligence on the remaining suppliers who have been identified as posing a medium risk of modern slavery
- reviewing and updating our supplier oversight programme to ensure that an appropriate level of monitoring is applied to our suppliers depending on the level of risk that they pose
- continuing to incorporate appropriate anti-slavery provisions into our contracts with our suppliers and
- identifying any additional training needs for procurement and HR colleagues.

Given the nature of our objectives, we do not believe that it is appropriate at this time to set key performance indicators in respect of our ongoing work in relation to modern slavery. This will be kept under review and we may adopt key performance indicators in the future.

This slavery and human trafficking statement for the financial year ending 31 December 2017 has been approved by the board of directors of Lowell Financial Ltd for and on behalf of all of the companies named at the beginning of this statement.

Bill Flynn

Company Secretary, Group General Counsel and UK Risk & Compliance Director

Approved on 21 November 2018