

## MODERN SLAVERY STATEMENT 2019

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

We are now publishing Lowell's third slavery and human trafficking statement in accordance with section 54 of the Modern Slavery Act 2015. This statement 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 [second modern slavery statement](#).

### Our business

Lowell is one of UK's largest credit management companies with a mission to make credit work better for all. Lowell's UK Board, which aligns to a number of best-practice governance codes (including the Financial Reporting Council's Wates Corporate Governance Principles for Large Private Companies), is directly accountable to the FCA for compliance with regulatory requirements and with all other applicable law. The UK Board is more generally responsible for ensuring that Lowell's activities in UK are conducted in the long-term interests of its customers, employees and business partners.

Our unparalleled combination of data analytics insight and robust risk management provides clients with a reliable and expert business partner. With our ethical approach to debt management, Lowell always looks for the most appropriate, sustainable and fair outcome for each customer's specific circumstances. This 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 fifth year running and our Gold rating from Investors in People.

Across a broad range of sectors, we specialise in three business areas within the credit management value chain:

- **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 Limited, 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 nearly 2,000 people in Leeds 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.

As noted in our second modern slavery statement, in 2018 we 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. The results of this assessment have now been validated and, in response, we have sought to amend contracts with existing suppliers where appropriate to incorporate robust anti-slavery provisions. We also include such provisions, as a matter of course, into our contractual arrangements with new suppliers.

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

## **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 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.

## **Objectives and key performance indicators**

Our objectives for the next 12 months are to:

- maintain and update, as appropriate, 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
- review and update 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
- continue to incorporate appropriate anti-slavery provisions into our contracts with our suppliers (old and new alike) and
- identify 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 2018 has been approved for and on behalf of all of the companies named at the beginning of this statement.

**Bill Flynn**

**Company Secretary, Group General Counsel**

**Approved on 7 June 2019**