

Modern Slavery and Human Trafficking Statement for the Financial Year ended 31 December 2019

Arrow Global Group Plc (Arrow) takes its Environmental, Social and Governance (ESG) responsibilities seriously and the business is run in a responsible and sustainable manner with a significant focus on the fair and ethical treatment of all stakeholders. As such, it is Arrow's policy that all its current activities are carried out in developed countries with strong legislation governing human rights and that it complies with such legislation and associated practices. We are committed to opposing slavery and human trafficking in our direct operations and in the indirect operations of our supply chain. This position is supported by policies and practices including our risk assessment of new suppliers and zero tolerance approach to non-compliance. This Policy will be controlled via Group Procurement, to ensure adherence within its supply chain.

Organisation Structure

This statement is made with respect to Arrow Global Group Plc (a company registered in England and Wales with registered number 8649661 and with its registered office at Belvedere, 12 Booth Street, Manchester M2 4AW) and each of its subsidiary undertakings (as defined in the Companies Act 2006). Additional details relating to Arrow's subsidiary undertakings can be found on pages 141-144 of the *Arrow Global Annual Report and Accounts 2019* via our Investor Relations website:

<https://www.arrowglobal.net/en/investors/results-reports-presentations.html>

Supply Chains

Arrow operates in the financial services industry and does not consider the risk of modern slavery or human trafficking within its supply chain to be high. Nevertheless, Arrow fully acknowledges the importance of rigorous due diligence of its business and supply chain to ensure any risk is reasonably reduced and mitigated. Arrow's supply chain includes the provision of a wide range of services from a variety of suppliers, including:

- Debt collection
- Audit
- IT
- Telephony & Network
- Data analytics
- Legal
- Recruitment
- Professional Services

Risks/Effectiveness

Within the UK and Europe, Arrow undertakes a risk assessment of all suppliers prior to their onboarding and audits are carried out on our debt-servicing panel on a regular basis by our Assurance Team. The onboarding process includes due diligence, followed by an on-site review where appropriate.

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Arrow takes a zero-tolerance approach to slavery and human trafficking and should any instances of non-compliance with the Act arise internally or in relation to any of our suppliers then this will be acted upon immediately and appropriate action taken. Our risk management framework enables risks to be raised by all employees and mitigation monitored both in country and at Executive or Board level in accordance with the governance requirements.

Policies

Our ESG Policy was subject to review and approval by the Board of Arrow Global Group Plc on the 28 February 2020. The ESG policy outlines our stance in relation to the commitment to compliance with the legislation governing human rights, across all geographies and jurisdictions. We encourage and empower our colleagues to raise concerns of any nature with the senior management of the business and Arrow Global has a comprehensive Whistleblowing Policy in place that is specifically supported by a process which protects the anonymity of colleagues.

Actions

We continue to apply the following actions:

- Assessment of slavery and trafficking in our supplier onboarding and due diligence processes
- Introducing specific measures to ensure that our obligations under the Act are passed through the supply chain;
- Reviewing and assessing existing key suppliers;
- Understanding how to go about monitoring potential risk areas within our supply chains;
- Introducing greater visibility & control on third-party spend
- Introducing purchase order processing capability in the UK
- Developing training to be provided to relevant employees to assist the identification of slavery related risk factors, including Whistleblowing and Incident Management training to further encourage the raising of any concerns.

This statement is made pursuant to Section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year end 31 December 2019. This statement has been approved by the Arrow Global Group Plc board of directors and will be reviewed and updated annually.

Approved by the Board of Arrow Global Group Plc on 2 June and signed by Lee Rochford, Group chief executive officer:



Arrow Global Group Plc



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