



**MODERN SLAVERY ACT 2015  
STATEMENT AND POLICY**

## **AMIGO LOANS**

### **MODERN SLAVERY STATEMENT**

1. Amigo Holdings Limited and its subsidiaries Amigo Loans Ltd and Amigo Management Services Ltd (together the “Company”) are companies registered in England and Wales.

2. The Company is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the management of its activities.

3. The Company, and its subsidiaries, are opposed to slavery and human trafficking in its direct operations and in the indirect operations of its supply chain. As such, the Company will not knowingly support or do business with any organisation involved in slavery or human trafficking.

4. Accordingly, the Company adopts a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

5. Similarly, the Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains. The Company fully supports the Government’s objectives to eradicate modern slavery and human trafficking and it expects the same high standards from all of its contractors, suppliers and other business partners.

6. These are supported by the following other corporate policies which the Company complies with as part of its ordinary business activities: Health and Safety Policy, Whistle Blowing Policy, and Anti-Bribery and Corruption Policy and human resources policies

7. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the Government eradicate the injustice and brutality of modern slavery and human trafficking.

*This statement has been approved by the Amigo Board of Directors on behalf of Amigo holdings Ltd and its subsidiaries. A new statement will be published annually on the Amigo website <https://www.amigoloans.co.uk/>*

## **AMIGO LOANS**

### **MODERN SLAVERY ACT TRANSPARENCY POLICY**

#### **1.0 INTRODUCTION**

1.1 Amigo Holdings Limited and its subsidiaries (together the “Company”) make statement pursuant to section 54(1) of the Modern Slavery Act 2015 and it constitutes the Company’s slavery and human trafficking statement for the financial year ending 31st March 2016.

1.2 Amigo Loans Ltd (one of the relevant subsidiaries) provides a personal loan to consumer borrowers based on the 'old-fashioned' concept of a guarantor loan. Loans are typically between £500 and £10,000 with a term of up to five years. The loan is targeted at consumers who are unable to access traditional lending markets as they either have an impaired, limited or no credit history. Each borrower is required to have a guarantor to make payment if the borrower does not.

1.3 Loans are originated from customers that apply to Amigo direct through Amigo's website, through an established network of credit-brokers or through repeat business from existing, well-performing customers.

#### **2.0 STRUCTURE**

2.1 The Company operates across the United Kingdom and has its operational office and headquarters located in Bournemouth, Dorset. It employs approximately 295 staff members, all of whom are based at the Company’s headquarters.

2.2 As a financial service provider, the Company has relatively straightforward supply chains compared with those of other sectors.

2.3 In the course of its ordinary business, the Company expects to purchase items in support of its day-to-day operational requirements. These include, but are not limited to, the procurement of goods and services relating to property related services (construction and maintenance), facilities management services, communications and IT equipment services, various professional services, office equipment and supplies and utilities.

2.4 The Company shall seek to ensure that the expected levels of ethical, environmental and social standards are met by all parts of its supply chain.

#### **3.0 DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

3.1 During this financial period, the Company introduced the process that, at point of engagement, potential suppliers must complete a preliminary questionnaire which shall include questions targeted at slavery and human trafficking risk. Responses to this initial questionnaire are used to determine the risk profile of suppliers for and will denote the level of due diligence processes the Company shall put in place as part of the review process.

3.2 As part of its normal due diligence processes, the Company expects, potential suppliers, where appropriate, to provide evidence to support their responses. It is similarly expected that where responses address areas associated with slavery and/or human trafficking (such as discrimination,

freedom of information, forced labour and child labour) that appropriate evidence is requested and obtained to support the due diligence process.

3.3 If a potential supplier is identified as a potential high risk, the Company shall undertake targeted due diligence processes which may include interviewing the management and employees to identify any worker exploitation in areas such as recruitment, pay, entitlements, treatment, accommodation and grievance mechanisms.

3.4 The Company's senior management team shall be informed of any potential high-risk supplier agreements and shall ultimately decide whether a business relationship should be established. They shall make use of the Company's Legal and Compliance teams as appropriate to ensure that mitigation is in place to reduce or remove any risk prior to the commencement of a business relationship.

#### **4.0 RISK IDENTIFICATION, MITIGATION AND CONTROL MEASURES**

4.1 The Company shall ensure that staff who are tasked with the undertaking of due diligence processes are suitably trained in order for them to be able to identify and assess potential risk areas in our supply chains, and where identified, mitigate the risk of slavery and human trafficking occurring in its business operations.

4.2 As part of our regular review of suppliers and key services providers, the Company shall continue to monitor potential risk areas in our supply chains that may fall short of the expected levels of ethical, environmental and social standards.

4.3 As part of the Company's ongoing monitoring of its supply chain, it shall carry out regular reviews to ensure suppliers are assessed and the information held on its supply base is kept up to date. This may include supplier audits or on-site assessments dependent on the nature of the goods or services being provided and also on the industry sector in which the supplier operates. The frequency of these audits or on-site assessments will be dependent on the risk profile of the contract and/or supplier.

4.4 The Company shall continue to ensure that its whistle blowing processes are sufficient to protect whistle blowers who raise allegations that the Company, or part of its supply chain, may not reach the standards expected of them in relation to slavery and/or human trafficking. Accordingly, we encourage anyone, including colleagues, subcontractors, suppliers, customers and clients to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking.

4.5 The Company's Compliance and HR functions shall continue to be able to provide specific guidance for staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour and domestic servitude among our customers and clients and how to respond to and escalate any concerns through the appropriate channels.

#### **5.0 ASSESMENT OF EFFECTIVENESS OF CONTROL MEASURES**

5.1 The Company accepts that Modern Slavery risk is not static, and will continue its approach to mitigating any potential risk in the year ahead.

5.2 In order to assess the effectiveness of the measures it has put in place, the Company will continue to review the following key performance indicators and report on them in future Modern Slavery Statements:

5.2.1 actions taken to strengthen supply chain auditing and verification;

5.2.2 steps taken to upskill any suppliers identified as “high risk” and assessing their ability to detect and mitigate modern slavery risk in supply chains; and

5.2.3 investigations undertaken into reports of Modern Slavery and remedial actions taken in response.

5.3 The Company’s annual Modern Slavery Act Transparency statement will continue to provide information to supplement this policy, including details of our activities and supply chains. This statement shall be made available on the Amigo website and upon request.