

## Indigo Michael Limited Modern Slavery Statement

### **Purpose**

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and is published on behalf of Indigo Michael Limited (the "Company") having a turnover in excess of £36 million. References in this Statement to "we", "us" or "our" are to the Company.

This is our updated statement for the financial year ending 31 August 2019 and it details the steps taken by us to ensure that slavery and human trafficking do not occur in our supply chains or any part of our business.

### **Our Business**

The Company provides revolving credit facilities to UK consumers using online bank transaction data for underwriting and affordability assessments.

We comply with applicable legislation relating to employee terms and conditions, and none of our staff earn less than minimum wage.

### **Supply Chains Risk Assessment**

We recognise that modern slavery is a crime and a fundamental violation of human rights. We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains.

We seek to ensure that we engage only with those suppliers who uphold the values to which we adhere and require that all our suppliers act ethically and with integrity at all times, sharing our commitment to humane and safe working practices.

Whilst we are not aware of any incidents of modern slavery within our supply chains or any part of our business to-date, we intend to undertake further risk assessments and analysis across our organisation to ensure consistency, comprehensiveness and quality in the manner and mode of supplier assessment, both pre and post-engagement.

### **Policies, Procedures and Compliance**

We take our responsibilities seriously and aim to demonstrate our commitment to operating fairly, honestly and in compliance with all applicable legislative, regulatory and ethical requirements and believe we must foster a culture in which integrity and responsible and ethical values are at the very core of all our activities and decision-making processes and any abuse of human rights, either within our business or by anyone employed by or associated with it, will not be tolerated.

We are committed to ensuring that our business operates ethically at every level and that our people and suppliers understand and share this commitment.

Our Anti-Slavery Policy details our zero-tolerance approach to any form of slavery or trafficking in our supply chains or any part of our business.

### **Contractual Controls and Due Diligence**

Our zero-tolerance position in relation to slavery and human trafficking is further supported through our continued objective to incorporate suitable provisions within our supplier contracts. We will continue to review both future and current supplier contracts and, where appropriate, strengthen their terms to further limit the likelihood of slavery or human trafficking occurring in our supply chains or any part of our business.

We adopt a risk-based approach to due diligence and have been working on adapting and enhancing our due diligence processes on a range of issues, including modern slavery and human trafficking, prior to entering into a relationship with any supplier who may be considered high risk and/or operates in a higher risk region(s). We wish to ensure consistently high standards are applied when undertaking risk assessments and due diligence across our organisation and will continue to work on improving this process. Where deemed appropriate, expert external providers are engaged to support us in undertaking such diligence.

### **Training**

All employees are required to undertake continuing training which reinforces the standards and behaviours we expect of all our staff, the repercussions of failing to adhere to such standards and the steps employees should follow to report potential breaches of our policies. All new employees undertake such training as part of their on-boarding process and at least annually thereafter.

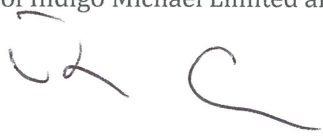
### **Measuring Performance**

We have not yet adopted any specific modern slavery performance indicators, but we seek to identify means of measuring effectiveness and reporting. Our aim in 2019 is to achieve this through increased engagement and communication across our organisation and with our suppliers.

As noted, we will continue to keep our supply chains under review to identify and monitor ongoing and future risks. Drawing on best practice, regulatory requirements and/or industry guidance which may develop, we will seek to strengthen our measures to detect and prevent slavery and human trafficking taking place in our supply chains or any part of our business.

### **Board Approval**

This slavery and human trafficking statement for the financial year ending 31 August 2019 has been approved by the Board of Indigo Michael Limited and signed by John Cameron (Director and General Counsel)



JOHN CAMERON  
DIRECTOR / GC      3 May 2019