



Slavery & Human Trafficking Statement

Background

Part 6 of The Modern Slavery Act 2015 came into force on 29 October 2015. It requires certain commercial organisations to prepare and publish a slavery and human trafficking statement for each financial year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes PRA Group's slavery and human trafficking statement for the financial year ending 31 December 2022 and is titled Modern Slavery Statement 2023.

About PRA Group (UK) Limited

PRA Group (UK) Limited ("**PRA Group**") is a company registered in England and Wales having its registered office at Level 11, Riverside House, 2A Southwark Bridge Road, London SE1 9HA. PRA Group is a debt purchase and collection business, purchasing portfolios of regulated and unregulated debt from credit providers in the UK.

PRA Group is part of a global group of companies spanning the Americas, Europe and Australia. PRA Group, Inc. is the ultimate parent of PRA Group and is listed on the NASDAQ stock exchange. PRA Group operates a single entity structure within the UK, with all UK portfolios purchased and serviced by the same corporate entity by colleagues and agents located in UK offices.

PRA Group is authorised and regulated by the Financial Conduct Authority.

PRA Values

All PRA Group employees share a common set of values and commitments that define how we treat each other, how we relate to our customers, and the responsibilities we have to shareholders, regulators, clients and other stakeholders. Simply put, these are the principles that represent PRA's culture, values, and what PRA is today. Our goal is for every PRA Group employee to personalise and live these shared values, because they are the baseline for everything we do.

PRA Group is:

- **COMMITTED** to always doing our best work.
- **ACCOUNTABLE** for our actions.
- **RESPECTFUL** in our interactions with each other.
- **ETHICAL** in every situation.
- **SUCCESSFUL** because we work together as a team.

PRA Group is committed to the highest standards of ethical behaviour, individual integrity, and professional conduct. PRA Group's reputation can be preserved only if all employees establish and adhere to the highest moral and ethical standards in the conduct of the Group's business.

This commitment is underlined in PRA Group's Code of Business Conduct and Ethics which underpins all business decisions, policies and processes and provides basic guidelines of business practice and professional conduct that PRA Group expects its employees across all Group businesses to adopt and uphold.

Risk Assessment and Management

Given the industry in which PRA Group operates, PRA Group assesses that the risk of slavery or human trafficking existing within its supply chain is overall low. Notwithstanding this PRA Group ensures that:

- relevant systems incorporate measures to identify where such risk may exist within PRA Group's business and supply chains;
- clear guidance exists demonstrating PRA Group's commitment to eradication of unethical business practices including slavery and human trafficking; and
- failure to meet PRA Group's requirements regarding slavery and human trafficking is not tolerated.

Supply Chains

- PRA Group takes a risk based approach to assessing its supply chains. PRA Group's due diligence process for new material suppliers to the business requires confirmation from potential suppliers of goods and services that they have taken steps to ensure slavery and human trafficking is not taking place within their organisation, or within their own supply chains. As part of PRA Group's drive to identify and mitigate risk, its contracted suppliers of goods and services are required to confirm their compliance with all applicable legal and regulatory requirements.
 - This is achieved by using a procurement system and software which gives better visibility and control of third-party suppliers and spend.
 - Additionally, new suppliers are required to register via an online portal and to provide information on their anti-slavery measures as part of the supplier onboarding process.
- Material contracted suppliers are required by PRA Group in the course of audit to confirm that they have taken steps to ensure slavery and human trafficking is not taking place within their organisation, or within their own supply chains.
- PRA Group's key suppliers are monitored through periodic risk assessment and onsite audits, where this is appropriate, and issues identified as requiring remedial action are tracked to closure.
- PRA Group has also evolved its seller due diligence questionnaire (prior to portfolio purchase) to include questions related to Modern Slavery Act compliance.

Employment

PRA Group has robust recruitment practices in place, to ensure compliance with legal regulatory requirements, including those related to slavery and human trafficking. Appropriate background checks are completed in respect of prospective employees, including confirmation that prospective employees have the right to work and remain in the UK. All PRA Group's employees are appropriately remunerated in accordance with their role.

Awareness

PRA Group ensures that its relevant employees and officers have high level awareness and understanding of the risks of slavery and human trafficking in supply chains, and within PRA Group's business.

Policies

PRA Group has zero tolerance towards slavery and human trafficking and is committed to ensuring there is no slavery or human trafficking taking place in its supply chains, or any part of its business. Policies relating to supply chains are regularly reviewed, and where required, updated.

PRA Group has a clearly defined Code of Business Conduct and Ethics (the "**Code**"), which PRA Group's suppliers are expected to adhere to in the same way as directors, officers and employees of PRA Group. The Code identifies several different ways in which employees or third parties may raise issues or concerns. Any slavery and human trafficking concerns may be reported under PRA Group's Whistleblowing Policy, through PRA Group's independently managed whistleblowing hotline.

Improvements and Actions

Improvements

Since publication of PRA Group's last statement, the following improvements have been achieved:

- Quarterly meetings of PRA Group's modern slavery steering group to review ongoing actions and consider other possible improvements that PRA Group could make regarding modern slavery;
- Referral schemes for customers seeking financial advice and customers who are victims of economic and financial abuse set up by PRA Group with leading (free service) debt management companies;
- PRA Group has signed the Inclusive Economy Partnership Code of Practice, a government backed initiative, for better and fairer debt collection processes;
- PRA Group has partnered with an external supplier to provide a free online benefits checker tool on the PRA Group website to support financial literacy;
- Cost of living payments have been made by PRA Group to certain of its employees to support their financial wellbeing;
- PRA Group has delivered a programme of employee financial wellbeing seminars and workshops as part of a larger calendar of wellbeing events to promote financial literacy;
- PRA Group has supported an initiative in Ayrshire, designed to tackle digital poverty in the local community, by providing sponsorship for computer equipment; and
- Continued sponsorship by PRA Group of The Money Advice Liaison Group, including facilitating fortnightly member forum sessions to improve the lives of people in debt.

Actions

During the next financial year PRA Group intends to:

- Continue to apply, and where possible improve, its processes for the identification and assessment of slavery and human trafficking risks in its supplier onboarding, due diligence and audit procedures;
- Consider how it can adapt and incorporate the principles of BS 25700 – Organisational Responses to Modern Slavery (Guidance) into its existing processes;

- Continue to raise awareness of modern slavery and human trafficking among all PRA Group staff through regular training;
- Promote initiatives to support victims of financial and economic abuse;
- Further promote the wellbeing of PRA Group's employees; and
- Identify other areas of its business where PRA Group can do more to identify and tackle human exploitation in society and improve welfare.



Per Martin Sjölund
Chairman of the Board

Date: 20 June 2023