

Modern Slavery and Human Trafficking Statement

Version control

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1.0	December 2017	Ruth Peck	Review and New Format
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Policy Document Information

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Introduction

Hoist Finance is committed to leading by example, ensuring all its business practices are fair, ethical and conducted in an open and transparent way.

This statement sets out our commitment to combating the risk of modern slavery or human trafficking in our supply chains or in any part of our business. The requirements of the Modern Slavery Act 2015 focus on eradicating modern slavery within UK business. This objective is fully supported by Hoist Finance as a whole.

This statement covers both direct and indirect (DCA) operations, back office, specialist support services and supply chains. It also sets out the steps we will take within our client and customer base in order to combat the risk of modern slavery and human trafficking in these areas. Our commitment is embedded into relevant policies allowing us to manage our approach to modern slavery and human trafficking in all areas of our business.

The policies affected are: Corporate Social Responsibility; Anti-Money Laundering Policy; Supplier Code of Conduct; Employee Code of Conduct; Outsourcing Policy; Whistle Blowing Policy and Procurement Instructions.

Our company structure and business

This statement is made on behalf of Hoist Finance UK Limited and Robinson Way Limited:

“These UK businesses operate as part of Hoist Finance AB, based in Sweden. The UK business is a partner to international banks and financial institutions to deliver trusted debt restructuring services as well as managing credit portfolios purchased from trusted financial sources. We specialise in serving banks in handling non-performing loans, and supporting individuals in becoming debt free.

Through expertise and rigorous compliance we earn the banks’ trust. Through respect, honesty and fairness we earn the trust of our customers.”

Hoist Finance currently operates in the following countries:

- United Kingdom, Sweden, Belgium, The Netherlands, France, Germany, Greece, Poland, Italy, Spain

Our Supply Chain

We procure a wide range of goods and services from a variety of suppliers. Our supply chains currently support the following activities;

- Debt Collection
- Call Centre Support
- Printing and Print Distribution
- Recruitment and Training
- Advertising and Marketing
- Legal Services
- Data Analytics
- IT Services
- People Benefit Services
- Facilities and Catering
- Business Processing Outsourcing

Together our supply chain helps us to deliver services to all our customers, clients and employees. Our supply chain is diverse, including small and medium sized businesses, business owned, as well as multinational corporations. Many of our direct suppliers have their own extensive supply chains, connecting us with the services and business support needs we require. It is important that our suppliers share our commitment to human rights. With regards to modern slavery, our primary focus is on high risk areas of our supply chain, which include but are not limited to our sub-contracted workforce.

Supplier Due Diligence and Assessment of Risk

As we aim to work only with appropriate suppliers who can meet the standards we expect, we have a robust Supplier Code of Conduct [\[link\]](#). This outlines how we manage human rights in our supply chain by encouraging behaviours and practices consistent with our own policies. The UK businesses undertake a risk assessment of all suppliers prior to on-boarding and audits are carried out on our debt servicing panel on a regular basis.

Actions

We will complete the following actions to ensure that our commitment to combating modern slavery and human trafficking is made clear throughout our governance model.

- Extend the scope of our relevant policies to specifically include modern slavery and human trafficking
- Ensure our Supplier Code of Conduct makes specific reference to the International Labour Organisation Core Conventions and the Modern Slavery Act.
- Apply these obligations to all supplier relationships, regardless of the industry and geography in which they operate.
- We will notify potential suppliers about this as part of our requirements before they submit quotes or bids for work.

- Ensure our contracts with suppliers include our standard terms and conditions requiring suppliers to adhere to all applicable law, including the conventions of the International Labour Organisation and the International Bill of Human Rights.
- Review and assess existing suppliers and in particular their sourcing policies in key risk areas.
- Establish a risk framework to determine and monitor potential human rights risks within our supply chain.
- Developing relevant training programmes to raise awareness and assist in the identification of slavery related risk factors.

Monitoring our Effectiveness in Combating Modern Slavery and Human Trafficking

In order to maintain high standards of integrity, we encourage principles of openness and honesty and encourage all employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. The company encourages any circumstances that may give rise to an enhanced risk of slavery or human trafficking to be reported and our whistleblowing procedure is designed to make it easy for employees and contractors to make disclosures without fear of retaliation.

For our main suppliers we will establish a framework to carry out annual checks to ensure continued adherence to these standards using a combination of attestations and on site visits.

We will take 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 reviewed and lead to the termination of those business relationships.

Board Approval

The company will continue to work on minimising the risk of modern slavery and human trafficking in our business, supply chains and customer / client base. This statement was approved on [date] by the Company's Board of Directors who review and update it annually

Julian Winfield
UK CEO
DATE