

## **ELEVATE CREDIT INTERNATIONAL LIMITED: MODERN SLAVERY STATEMENT**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Elevate Credit International Limited ("ECIL") trading as Sunny has taken during the financial year 2018/2019 to ensure that slavery and human trafficking does not take place within its business operations or its supply chain.

### **1. OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS**

ECIL provides high-cost short-term instalment loans from £100 to £2,500 to UK consumers. ECIL operates across two sites, an office in London and an office in Bury St Edmunds, and employs around 160 employees.

Our supply chain includes media agencies, credit brokers, outsourcing partners, external mailing house, software suppliers and developers and professional service firms. We do not act as a producer, manufacturer or retailer of physical goods and have no supply chains in relation to such activities.

### **2. OUR POLICIES**

While ECIL does not operate a stand-alone Modern Slavery and Human Trafficking Policy, we do nevertheless operate key policies and procedures within our business to ensure that we do not allow or encourage slavery and human trafficking.

Key policies and procedures include:

- Vendor Management Policy – sets out how we manage the risks posed by entering into business with other service providers;
- Whistleblowing Policy – we encourage all of our employees, customers and other business partners to report any concerns related to its direct activities or its supply chains;
- Employee Handbook – employee code of conduct which sets out the actions and behaviour expected of employees when representing ECIL; and
- Anti-Bribery and Corruption Policy – details our approach to reducing and controlling the risks of bribery as well as our procedures on accepting gifts, hospitality or donations.  
Recruitment and on-boarding procedure – all employees undergo identification checks which include provision of a copy of their current passport. Where an individual does not hold a British passport we request documentation in support of their visa status. Other checks are also conducted via a third party which includes searches for any negative criminal and credit associated markers.

### **3. DUE DILIGENCE PROCESSES**

As part of our Vendor Management Framework, ECIL undertakes risk based due diligence when considering taking on new suppliers. We also carry out ongoing reviews of existing suppliers.

Our due diligence process includes an evaluation of the modern slavery and human trafficking risks of each new supplier and where appropriate, we will not engage with a vendor where we believe the

risk is too high or the controls put in place by the potential supplier are not adequate and/or appropriate.

#### **4. OUR MANAGEMENT OF RISK**

ECIL ensures that appropriate monitoring of risk within its own business and within its suppliers' businesses is undertaken in order to demonstrate compliance with applicable rules and regulations as well as internal standards.

#### **5. OUR EFFECTIVENESS IN ELIMINATING MODERN SLAVERY**

This Modern Slavery Statement will be reviewed at the end of each financial year and updated as necessary.

#### **6. OUR TRAINING**

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, we will continue to educate and train employees on the dangers modern slavery. We will continue to ensure that the correct due diligence is conducted in all relevant parts of our business and is an integral part of all relevant processes. .

#### **7. STATEMENT BEING SIGNED BY AN APPROVED PERSON**

This statement was approved by the Board of Directors on 24 April 2019 and the Managing Director endorses this statement.

Managing Director: Scott Greever

Signature: *Scott Greever*

Date: 24 April 2019