

Modern Slavery Act Statement 2016

Modern Slavery and Human Trafficking Statement for the Financial Year ended 31 December 2016

We take our social responsibilities seriously, as demonstrated in our latest Annual Report, and are committed to ensuring the Arrow Global Group is run in a responsible way and to treating everyone we deal with fairly and ethically, from our customers and colleagues to our suppliers and business partners. As such, it is the Group's policy that all of its current activities are carried out in developed countries that have strong legislation governing human rights. We are therefore committed to understanding more about modern slavery and reviewing our policies and practices to ensure that slavery is not present within our business or our supply chain.

Organisation Structure

This statement is made on behalf of Arrow Global Limited, a private limited company registered in England and Wales with company number 05606545. Where possible, our policies and recommended best practice is shared across the Group, including our overseas subsidiaries.

Supply Chains

Arrow Global operates in the financial services industry and therefore does not consider the risk of modern slavery or human trafficking within its supply chain to be high but acknowledges the importance of diligencing its business and supply chain to ensure any risk is reduced to the extent possible. Arrow Global's supply chain includes the provision of a wide range of services from a variety of suppliers across the UK, including:

- Debt servicing services
- Audit services
- IT services
- Data analytics
- Legal services
- Recruitment services

Risks/Effectiveness

Within the UK, Arrow Global undertakes a risk assessment of all suppliers prior to their on-boarding and audits are carried out on our debt servicing panel on a regular basis by our Group Assurance Team. The on-boarding process includes due diligence, followed by an on site review.

Actions

We are in the process of undertaking the following actions:

- Extending our human rights policy to specifically address modern slavery and human trafficking;
- Incorporating an assessment of slavery and trafficking in our supplier on-boarding and due diligence processes and introducing specific measures to ensure that our obligations under the Act are passed through the supply chain;
- Reviewing and assessing existing suppliers;

- Understanding how to go about monitoring potential risk areas within our supply chains;
- Developing training to be provided to relevant employees to assist the identification of slavery related risk factors and to ensure adequate implementation of our anti-slavery policy

Arrow Global 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 appropriate action taken.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year end 31 December 2016. This statement has been approved by the Arrow Global Group Plc board of directors and will be reviewed and updated annually.



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Lee Rochford, Director

Arrow Global Group Plc