

Modern Slavery & Human Trafficking Statement 2023

Contents

Modern Slavery & Human Trafficking Statement	
1. Corporate Structure	2
2. Introduction	2
3. Supply Chain	2
4. Modern Slavery Risks	3
5. Operations.....	3
6. Risk Mitigation.....	4
7. Assessing Effectiveness	5

Modern Slavery & Human Trafficking Statement

1. Corporate Structure

- Anglo Scottish Asset Finance Limited

Anglo provide asset finance broking and vehicle fleet management services to customers in the United Kingdom.

2. Introduction

The company is opposed to slavery in all its forms, including; slavery servitude, forced labour, human trafficking, deceptive recruiting for labour or services, debt bondage, forced marriage and child labour.

Slavery and Human trafficking remains a hidden blight on our society, we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any type of a business relationship with our Company.

We are an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all our employees.

We want all our employees to feel confident that they can report concerns without any risk to themselves.

3. Supply Chain

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We build relationships with our suppliers to ensure they understand our values, and comply with our expectation and commitment to protect human rights and the environment.

The supply chain is divided into two main areas:

1. Funding and business procurement to provide services to our clients and customers including:
 - a. Facilitation of funding through financiers
 - b. Purchase of vehicles through dealer distribution network
 - c. Remarketing of off-lease assets
 - d. Provision of Accident Management and Roadside Assistance services through national providers
 - e. Provision of vehicle servicing and maintenance through repairer

networks, including the acquisition of tyres from distributors

2. Suppliers that provide goods and services to support our corporate functions including:
 - a. IT-related Merchandise, uniforms and marketing materials
 - b. Stationery, office supplies and furniture
 - c. Legal, financial and professional services
 - d. Events and catering
 - e. Facilities management services including office cleaning and waste disposal
 - f. Postage and couriers
 - g. services

We establish a relationship of trust and integrity with all our suppliers which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier reputation, respect for the law, compliance with health & safety and environmental standards and references.

4. Modern Slavery Risks

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values, if they wish to continue to work with us.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistleblowers. Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

5. Operations

Examination of our operational activities as part of the risk assessment revealed that the risk of Anglo causing, contributing to, or being directly linked to modern slavery practices with our operations (i.e. related to our directly employed workforce or the provision of products and services) is extremely low. This is because our employees and customers operate primarily within the UK and therefore considered low risk regarding child labour, forced labour or other modern slavery practices.

Anglo has a robust system of HR procedures to ensure compliance with UK legislation including confirming an individuals' right to work in the UK and maintaining a safe, healthy and inclusive workplace.

6. Risk Mitigation

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations
- We regularly review our processes, codes of conduct and our working practices to show our commitment

Whistleblowing (Protected Disclosures) – we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

Code of Conduct – our code will be reviewed and updated to encourage employees to do the right thing by clearly stating the actions and behaviours expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

1. Staff Training

Anglo will raise awareness of modern slavery issues by providing access to the online training course “Tackling Modern Slavery” for relevant employees on joining and also annually to all employees.

2. Due Diligence

- Through undertaking due diligence in our activity, we seek to ensure that we do not inadvertently support Modern Slavery. We make our processes known to potential employees and suppliers as a means of encouraging good practice.
- We ensure that all employees are legally entitled to work in the UK and that the contract is directly with them.
- We also ensure that any recruitment agency we utilise for the placement of temporary staff follows the same requirements to confirm the identity and right to work of individuals placed with us.
- When we undertake a full public procurement process potential suppliers must self-declare if they meet the relevant criteria in the Modern Slavery Act 2015.
- We will further review our supplier onboarding process to embed checks on suppliers to ensure compliance with the requirements of the Modern Slavery Act 2015.

7. Assessing Effectiveness

Anglo is committed to continually improving our processes and actions to address modern slavery risks in our operations and supply chain through our HR and Compliance dept.

Some of the key opportunities identified include:

- Further strengthening of our policies including the establishment of a human rights policy for the group and updating our Supplier Code of Conduct to clarify our expectations of suppliers with respect to due diligence and ongoing assessment.
- Develop a modern slavery risk mitigation plan, including actions to manage risks within high-risk categories
- Develop and begin implementation of a well-defined supplier due diligence process for both new and existing suppliers to assess modern slavery risks, monitor performance and report on the effectiveness of actions on an ongoing

In addition employees and external contacts can report any concerns in relation to potential modern slavery linked to Anglo's operations to HRTeam@ico.org.uk.

We understand that tackling financial crime is the right thing to do and we seek to combat financial crime by taking a proactive approach. In the context of modern slavery specifically, we recognise that we cannot tackle modern slavery in isolation and we actively look at ways to work with other supply chains to reduce this.