



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 2021. Our previous statement for the financial year ending 31 December 2020 was titled Modern Slavery Statement 2020. However we have titled this statement, for the financial year ending 31 December 2021, Modern Slavery Statement 2022 as the public registry hosts statements by the calendar year they are due to be published. As a result, in the interests of transparency, we will not have a Modern Slavery Statement titled Modern Slavery Statement 2021.

About PRA Group (UK) Limited

PRA Group (UK) Limited ("**PRA Group**") is a company registered in England and Wales having its registered office at Wells House, 15-17 Elmfield Road, Bromley, Kent BR1 1LT. 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 with regard to 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 potential suppliers of goods and services to confirm they have taken steps to ensure slavery and human trafficking is not taking place within their organisation, or within their supply chains. As part of our drive to identify and mitigate risk, PRA Group's 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 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 tracked to closure.
- PRA Group's has also improved 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 relevant employees and officers have high level awareness and understanding of the risks of slavery and human trafficking in supply chains, and within the 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. The Code identifies several different ways in which employees or third parties may raise issues or concerns.

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:

- Implementation of a quarterly modern slavery steering group to review our intended actions and other possible improvements within PRA Group regarding modern slavery;
- Creation of two new calm areas for employees to time away from their desks where required to do so for mental health and wellbeing reasons;
- Implemented employee wellbeing workshops as part of a larger calendar of wellbeing events;
- Implemented a wellbeing information site on our internal intranet for employees to access: this area includes external links, link to emotional wellness courses and over 30 documents;
- Organised a team based pedometer challenge: which was viewed as being motivating, gave permission to employees to take a break and exercise, connected employees to each other and involved charitable donations made on behalf of PRA Group (and other group companies across Europe); and
- Joined a pilot scheme aimed at addressing economic and financial abuse and supporting those experiencing it.

Actions

During the next financial year PRA Group intends to:

- Continue to apply, and where possible improve, identification and assessment of slavery and human trafficking risks in our supplier onboarding, due diligence and audit procedures;
- Improve our process for reporting slavery and human trafficking issues;
- Continue to develop and improve awareness and training among all staff;
- Further improve PRA Group employees’ conditions with a focus on employee mental health and wellbeing; and
- Identify other areas of our business where we can do more to identify and tackle human exploitation in society and improve welfare.



Per Martin Sjölund
Chairman of the Board
Date: 7 June 2022