

# Zopa Modern Slavery Statement 2022

This statement sets out the steps that Zopa took in 2022 to ensure slavery and human trafficking didn't occur within our organisation and supply chains and provides details on the structure of our organisation.

## Modern slavery and human trafficking

It's a sad fact that cases of slavery and human trafficking have continued to rise in the UK. In 2022, 16,938 potential victims of modern slavery were referred to the Home Office, which represents a 33% increase from 2021. That's the largest annual increase in referrals since records began.

Whilst there are a number of agencies and aid programmes in place to support victims and prevent slavery and human trafficking, we must also play our part in the fight against these horrendous crimes. We are proud that our people and procedures have performed effectively in the important prevention of these crimes.

We continue to stand against slavery and human trafficking in all its forms.

## Our Organisation

We operate in the UK financial services industry and our group is made up of the following companies:

- **Zopa Bank Limited** (Company number 10627575) through which we provide our customers with a range of banking products, including: unsecured personal loans, hire purchase loans, credit cards and savings products.
- **Zopa Embedded Finance Limited – trading as DivideBuy** (Company number 14602085) a new group company we created in January 2023, which trades as DivideBuy and provides our customers with point of sale finance for retail purchases. \*
- **Zopa Group Limited** (Company number 10624955) which is our ultimate parent company.

\* Zopa Embedded Finance Limited acquired the DivideBuy operations from Rematch Credit Limited on 01 April 2023. Whilst the DivideBuy business is now part of the Zopa organisation, this statement relates to our actions in 2022 and so the actions set out in this statement relate to Zopa Bank Limited and Zopa Group Limited only. DivideBuy's activities in 2022 are detailed in their modern slavery: <https://dividebuy.co.uk/modern-slavery-act-statement/>

Our activities are regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Our organisation employs 729 people who mainly work through our London office, but we also have employees who work from Stoke-on-Trent and Spain.

### **Zopa's Policies**

The following policies are in place to prevent modern slavery and human trafficking within our organisation (either directly or indirectly through our suppliers):

- Outsourcing, Procurement and Supplier Management Policy – we carry out a risk assessment of all potential new suppliers before we enter into any commercial relationship with them. This includes an assessment of the likelihood that slavery or human trafficking could take place within their organisation, as well as the measures they have in place to manage the risks of slavery and human trafficking. Where we determine a new supplier is at high risk of slavery or human trafficking taking place within their organisation (or indirectly through their supply chain) we conduct enhanced due diligence checks against that supplier.
- Whistleblowing policy – our staff can raise concerns they have, including concerns of potential slavery or human trafficking, through our discreet and confidential whistleblowing process. These concerns will then be investigated either by our Head of Compliance or our Whistleblowing Champion.

We remain of the view that the risk of slavery or human trafficking impacting or arising through our business activities is low, given the strong regulation of the financial services industry and human rights legislation. However, we will continue to review the suitability and effectiveness of our policies and procedures in light of the increasing cases of slavery and human trafficking.

We've set out below the steps we took to prevent modern slavery and human trafficking within our organisation and in our supply chains in 2022.

### **Steps we took within our organisation in 2022**

#### **Culture and recruitment**

Ensuring we have the right people with the right values remains a vital component in our fight against slavery and human trafficking. One of our company values is that we're "In it Together" - which means we all pull together to reach our goals. This value captures the spirit in which we all work together to effectively implement our policies and procedures which address these risks. Hiring staff who share our values and assessing our existing workforce against these values remained a priority in 2022.

#### **Training and guidance**

We provided:

- targeted training and guidance to our supplier relationship managers on how to manage and monitor our suppliers. This training focused on the importance of conducting effective initial and ongoing due diligence and considering whether a suppliers' industry and/or geography increases the risk that supplier represents; and
- new starter and refresher training to existing staff on our whistleblowing policy and procedures - encouraging all employees to safely and anonymously report concerns, including slavery and/or human trafficking.

## Steps we took relating to our supply chains in 2022

We tailor the monitoring of suppliers we use according to our risk assessment of the likelihood that slavery or human trafficking could occur within a supplier's organisation.

We engage external suppliers for a broad range of products and services, which include:

- Technology Services: for the provision of computer and telephone hardware, software, networking, storage and information security services.
- Payment Services: including agency banking, payment network and financial messaging infrastructure, payment processing services and the supply of cards.
- Professional Services such as auditing and specialist advisory services to support legal, risk management, finance and marketing functions.
- Human Resources Services: including the use of recruitment agencies to find contractors and permanent employees, human resource management systems and payroll software.
- Facilities Services: including the use of cleaning, catering, maintenance, utilities, postal services and stationery supplies.

## Supplier risk assessments and due diligence

In accordance with our Outsourcing, Procurement and Supplier Management Policy, we carried out risks assessments on all our new suppliers to assess:

- the risk that slavery or human trafficking could take place within their organisation and supply chain; and
- the effectiveness of the systems and controls the potential supplier has in place to prevent the risks of slavery and human trafficking materialising within their organisation or supply chain.

## Enhanced due diligence

We still consider that the following types of suppliers present a greater risk of slavery or trafficking impacting our supply chain:

- providers of facilities, construction and building maintenance or manufacturing (including the supply of computer hardware) services; and/or
- suppliers in what we consider to be high-risk geographical locations.

In light of this conclusion and following the risk assessments we carried out under our Outsourcing, Procurement and Supplier Management Policy, we undertook enhanced

due diligence specific to modern slavery and human trafficking risks on 7 Suppliers. Each supplier was asked to confirm how they identify and prevent risks related to slavery and human trafficking within their organisations and their own supply chains. These suppliers included providers of computer hardware, marketing services, manufacturing companies and providers of facilities and catering services.

No concerns in respect of these suppliers were identified following this exercise.

**How did we do?**

We believe the monitoring we carry out on our suppliers and the training we provide our staff have continued to prove effective in preventing slavery or human trafficking from impacting our organisation.

Whilst we have had no incidents of slavery or human trafficking within our organisation and are not aware of any incidents occurring within our supply chain; we remain committed to improving our controls and processes where we identify ways in which these can be enhanced.

This statement in relation to the Zopa Group's 2022 financial year was approved by the Board of Zopa Group Limited on 27 June 2023.

Signed by



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Jaidev Janardana  
CEO Zopa Group Limited