



Statement pursuant to the Modern Slavery Act 2015

Introduction

The Modern Slavery Act 2015 requires any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the United Kingdom, and is above a specified total turnover, to produce and publish an annual slavery and human trafficking statement.

This statement relates to the actions and activities during the financial year 1 April 2020 to 31 March 2021. Swift Group is committed to the prevention of the use of forced labour and has a zero-tolerance policy for human trafficking and slavery.

In relation to the Covid-19 pandemic, we are aware that this is likely to put all supply chains under additional pressures which could lead to new or increased risks of labour exploitation in the coming months and further into the future. We will continue to review our policies and practices in light of these risks.

Organisation's Structure

The Swift Group has been established for over 30 years as a specialised, non-conforming lender, offering secured loans and mortgages to consumers through a network of accredited third-party brokers.

The principal operating company of the Swift Group is Swift Advances plc. Swift Advances plc is a public limited company, owned by Kestrel 2 Bidco Limited which in turn is owned by Kestrel 2 Holdings Limited.

Swift Advances plc administers a portfolio of unregulated secured loans. Swift Advances plc's subsidiary, Swift 1st Limited administers a portfolio of regulated mortgage contracts on behalf of the Swift Group.

Kestrel 4 Loans Limited holds the beneficial interest in the portfolios administered by Swift Advances plc and Swift 1st Limited.

Swift Advances plc, Swift 1st Limited, Kestrel 2 Holdings Limited, Kestrel 2 Bidco Limited and Kestrel 4 Loans Limited are registered in England and Wales under company numbers 1800474, 5020019, 11714864, 12097171, 8594409 respectively. Our only office is in Brentwood and we have c.80 employees.

Our Suppliers

Whilst Swift Group outsources few services, our supply chain does include accounting services, legal services, IT equipment and services and facilities management. The Swift Group operates in the UK alone, with the vast majority of our suppliers also based in the UK.

Each outsourced service supplier's conduct is carefully considered when awarding or renewing business. We foster long-term relationships with suppliers and avoid making demands of suppliers that might lead to them violating human rights. Efforts are made to certify that outsourced service suppliers are as committed to the prevention of human trafficking and slavery as Swift Group. Swift Group will not tolerate outsourced service suppliers who partake in any form of slavery or human trafficking as defined by the Act.

Relationships with outsourced service suppliers are reviewed on a periodic basis and those reviews will have regard to human trafficking and slavery.

It is possible that allegations of human trafficking and slavery may be made. If allegations do emerge, Swift Group will comprehensively investigate any allegations that an outsourced service supplier is partaking in slavery or human trafficking. This investigation would be conducted by our Risk Committee.

Our Policies

Swift Group will not use or allow the use of forced, compulsory labour, slavery, servitude or human trafficking in the course of its business. This includes sexual exploitation, securing services by force, threats or deception and securing services from children and vulnerable persons.

Our employment procedures guarantee that Swift Group conducts appropriate checks on all employees to ensure they can legally work in the United Kingdom.

In addition, all internal policies are reviewed regularly to ensure continued compliance with the Modern Slavery Act 2015.

Swift Group operates the following policies which are relevant to the prevention of slavery and human trafficking in its operations:

Outsourcing Policy - this establishes that Swift Group will continue to comply with the Modern Slavery Act 2015 and conduct annual reviews of outsourced suppliers.

Whistleblowing Policy - Swift Group encourages all of its employees to report any concerns related to the activities of the business. The organisation's whistleblowing procedure is designed to ensure that any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the issue. Additionally, the policy guarantees that no one will be victimised for raising a matter under this procedure.

Our Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, appropriate training is provided to all relevant employees.

Our Performance Indicators

The effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain will be known if no reports are received from

employees, the public, our customers, regulators or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval

This statement will be reviewed annually by our Compliance department.

This statement has been approved by the Board of Kestrel 2 Holdings limited. It is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Swift Group's slavery and human trafficking statement for the financial year 1 April 2020 to 31 March 2021.

Andy Punch
Chief Executive Officer
July 2021