

Anti-Slavery and Human Trafficking (Modern Slavery) Statement

Oodle Financial Services Limited

A large, decorative graphic at the bottom of the page consisting of two overlapping, rounded, circular shapes in a dark purple color, resembling a stylized infinity symbol or a continuous loop.

This statement is made by Oodle Financial Services Limited (“**Oodle**”). It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 and is in respect of the financial year from 1 July 2019 to 30 June 2020.

About us

We are a technology driven finance company in the used car retail market, focused on developing world class consumer retail propositions that re-invigorate the buying process and put the everyday customer back in control.

Our mission is to redesign car buying for real people, in the real world. We aim to deliver this through two different models:

- Point Of Sale, where we assist the customer through the buying process with dealer owned cars, providing them with the finance they need
- Direct To Consumer, where we are responsible for not only providing the finance, but also supporting the customer in finding the perfect car for them.

Since 2016 we have grown exponentially, creating trusted customer experiences with intuitive industry defining products that have resulted in loan books worth nearly £720m. We combine our collective outstanding capability, with incredible funding and a passionate culture and strong values, to give us the Oodle difference.

Our commitment

At Oodle, we aim to employ high ethical and professional standards, to act responsibly and empathetically towards our customers, suppliers and other stakeholders; and always to comply with local laws and regulations applicable to our business.

Accordingly, **we commit to having a zero tolerance to modern slavery and human trafficking.**

This statement offers insight into some of the steps we have taken which would combat and mitigate risks associated with modern slavery and human trafficking within our business and our supply chains, along with some of the next steps we aim to take to ameliorate them further.

Regulated business operating in the United Kingdom

Oodle is a business authorised and regulated by the Financial Conduct Authority in the UK.

We provide consumer credit pursuant to Consumer Credit legislation, using hire purchase agreements to individual customers to assist in their purchase of motor vehicles. We work closely with a network of dealers and brokers and other partners, in each case located in in England, Wales and Scotland.

We have a workforce of approximately 400 people (including contractors or sub-contractors and outsourcing partners), about 300 of whom are direct employees, who are predominantly based in the United Kingdom.

We consider that the predominantly skilled nature of our workforce and the geographical location of our workforce and business, is not commonly associated with and having a high risk of, or being vulnerable, to modern slavery and human trafficking; however we take the responsibility of assessing this risk very seriously.

As with our own employees, where we aim to maintain high standards in our recruitment process, in accordance with our Employee Handbook, vetting and suitability checks are also conducted in relation to our contractors and third-party labour, whether that be directly with individuals or the corporate entities, as applicable.

Individuals are able to raise any concerns they have in line with our Whistleblowing policy. We are committed to take any such reports seriously and conduct any consequent investigation appropriately.

Our Supply Chain

Our supply chain includes national car dealerships, funding partners, providers of IT solutions and office supplies as well as facilities management.

Just as we will not tolerate modern slavery within our business or supply chain, we expect the companies we work with to support and promote this position in return.

Our Policies and Procedures

At Oodle, we have a number of corporate-wide policies and procedures in place that contribute towards mitigating the risk of modern slavery and human trafficking occurring, including: Conduct and Risk, Whistleblowing, Outsourcing, Anti Bribery and Corruption, and Anti Money Laundering and Counter-Terrorist Financing, as well as our Employee Handbook.

Our Training

All employees are required to undertake mandatory annual compliance training, as well as introductory, periodic, and department specific training as and where necessary in the course of their duties to demonstrate an appropriate level of understanding and capability.

Risk Assessment

All risks across the Oodle business are managed through our Risk Management Framework for monitoring and management at the most senior levels within the Company. Any concerns raised in relation to modern slavery and human trafficking would be raised, monitored, and managed in this forum.

Our Next Steps

Over the next year, we will continue to monitor the risks associated with modern slavery and human trafficking. We aim to review current practices, policies, and procedures in order to mitigate the risk of modern slavery within our business and supply chain and look to enhance them, where necessary.

In doing so, in respect of modern slavery and human trafficking, we aim to:

- Raise awareness across the Oodle business, with additional targeted training to follow
- Introduce a new Anti-Slavery and Human Trafficking (Modern Slavery) policy, covering both our business, and considerations relating to our supply chain
- Introduce a contract assurance process for all material contracts with third parties
- Ensure all concerns raised, along with any associated actions taken, are logged and managed with our Risk Management Framework.

We remain committed to delivering high standards and will take appropriate action to ensure Oodle is free of all forms of slavery and trafficking, now and in the future.

Signed by:

This statement has been approved by Oodle's Board of Directors who will review and update it annually.

Jonny Clayton

CEO, on behalf of the Oodle Board