Introduction

The NewDay Group ("NewDay") aims to act fairly, ethically and openly in everything that we do. We are committed to carrying out our business responsibly, and this includes ensuring that slavery and human trafficking are not taking place in any part of our business or supply chain. The requirements of the Modern Slavery Act 2015 (the "Act") aim to work towards eradicating modern slavery in commercial organisations with business operations in the UK. NewDay fully supports this goal.

This statement, which has been approved and published by NewDay Cards Ltd (the only NewDay undertaking required to publish such a statement), provides details of the steps that we have taken as a business towards ensuring that slavery and human trafficking are not taking place within our organisation or within our supply chain for the financial year ended 31 December 2022.

Organisation structure and supply chains

Our structure: Our ultimate parent company, NewDay Group (Jersey) Ltd, incorporated in Jersey, together with its subsidiaries and subsidiary undertakings, comprise the NewDay Group.

Our business: NewDay is a leading consumer credit provider offering a range of unsecured credit products to serve the specific needs of prime and near-prime customers in the UK. We had 1,397 employees as at 31 December 2022.

For the financial year ended 31 December 2022, the Group reported total net revenue of £827m and an underlying profit before tax of £203m. Group closing gross receivables, one of our key performance indicators, totalled £4.3bn as at 31 December 2022.

Our most recent Annual Report and Financial Statements are available on our website at: https://www.newday.co.uk/investors/results-centre/.

Our supply chains: We work with approximately 375 third party suppliers, the majority of which are based within the UK or European Economic Area. Our supply chain is principally made up of direct third party suppliers who supply us with products and/or services which, in turn, help us to deliver services to our customers, clients and employees. A number of our suppliers use their own supply chain to deliver services to us, and thus we believe it is important that our suppliers share our commitment to combating modern slavery and human trafficking both within their own organisation and when overseeing their own third party supply chain.

Policies in relation to modern slavery and human trafficking

A statement in relation to human rights, which outlines the relevance of human rights to our employment policies and practices, is included on our website.

Our commitment to combating modern slavery and human trafficking is embedded into our policies. Our policies have been designed to take account of the requirements of the Act, including:

- our employment policies and procedures covering our obligations as an employer;
- our Code of Ethics and Integrity policy outlining our expectations regarding honesty and integrity, and stating that standards of conduct must be aligned with NewDay's Purpose and Values. Our Values are core to the way we work and set the behaviours and standards we expect from our employees;
- our commitment to fully supporting human rights. All aspects of our operations and, where material, our policies are guided by the Human Rights Act 1998 and the International Labour Organisation (ILO) core standards;
- we have robust and confidential whistleblowing procedures in place, underpinned by a Board-level Whistleblowing policy to allow employees and stakeholders to raise concerns about any aspect of NewDay's business practices;
- our Procurement policy detailing the need to understand our supply chain risk, use best practice in the application of ethical standards and comply with relevant legislation;
- our supplier frameworks specifying the supplier on-boarding due diligence required as well as ongoing monitoring requirements; and
- all of our employment policies and procedures are underpinned by our Board-approved People policy, which outlines our commitment to fulfilling all of our obligations as an employer in line with all relevant UK employment and equality law requirements and best practices.

Risk assessment and management

We carry out annual checks to ensure our employees' salaries are in excess of minimum wage requirements, together with ongoing checks to validate that benefits taken through salary sacrifice do not bring an employee's salary below the minimum wage.

We have put in place robust processes that aim to ensure we only work with appropriate suppliers who can meet the standards expected of them. Our primary supply chain focus is on areas of supply which potentially carry a higher risk, for example our sub-contracted workforce. Our general supplier risk assessment also allows us to understand and focus on our suppliers

with operations in higher risk locations, particularly emerging economies and less developed countries.

Where we enter into a contract with a new supplier on our standard terms and conditions, these require the supplier to comply with all applicable laws, which includes the Act.

Our Supplier Code of Conduct, encourages consistent behaviours and practices within our supply chain. It requires suppliers to support freely chosen employment – that is completed voluntarily and without slavery, forced or compulsory labour and human trafficking, irrespective of the industry or location of the supplier. Potential new and existing suppliers can view our Supplier Code of Conduct via our company website. All new suppliers are asked to confirm they have read and comply with our Supplier Code of Conduct when registering on NewDay's procurement system. This process is also being carried out for existing suppliers as part of our on-going supplier reviews.

Due diligence processes

Our supplier on-boarding due diligence process makes specific reference to the Act and its requirements. It requires suppliers to confirm if they have their own modern slavery statements or, if not applicable, confirm they have policies and/or training in place to ensure that appropriate and coordinated action is taken throughout their business to ensure their business and supply chain is slavery free. This supplier on-boarding due diligence applies to all supplier relationships regardless of the industry or geography in which they operate.

We carry out annual reviews to ensure that our material suppliers continue to adhere to our standards using a combination of annual supplier attestations, desktop assurance and on-site assurance visits. The required supplier attestations specifically reference the Act and its requirements. Any risks identified will be escalated, reported and managed in accordance with our supplier risk management procedures.

Training on modern slavery and human trafficking

We provide on-going training to our Procurement team and key stakeholders involved in supplier management to ensure competence in monitoring our adherence to the Act and compliance with this statement.

Key Performance Indicators

Measure	Current assessment	Future action
Procurement training and awareness	Ongoing Procurement team training and awareness around coverage and control of modern slavery risks in our supplier on-boarding process Requirement to read the Code of Ethics and Integrity policy as part of employee induction	Further develop training and awareness, including Chartered Institute of Procurement & Supply (CIPS) ethical training for all Procurement team members
Frequent review of associated and related policies	Policies are categorised by level according to our Policy of Policies and are subject to review in line with the frequency outlined for the policy level	Continuing our review of policies
Evaluation of suppliers before they are on-boarded into our supply chain	Our Supplier Code of Conduct is published on our corporate website Supplier attestation process in place to confirm commitment to the code for all new suppliers	Our Code of Conduct is being refreshed in 2023 to ensure it accurately reflects our Values and those we want our suppliers to support. Further

	Our supplier due diligence questionnaire includes questions specific to the Act	develop the supplier risk assessment process to identify supply from high risk countries
Review existing suppliers regularly, according to risk	Supplier attestation process under implementation to collect commitment to the code for all existing suppliers Top Tier suppliers are subject to annual or bi-annual review as defined by our supplier risk framework We have an independent and centralised supplier assurance programme	Complete implementation of commitment to the code for all existing suppliers Continue to develop our supplier assurance processes
Ensure expectations for suppliers are clearly communicated and contractually defined	New contract clauses now clearly lay out our ESG-related expectations, including modern slavery, allowing us to work with our vendors more closely to ensure that this risk, amongst others, is sufficiently mitigated. Legacy suppliers will be remediated at contract renewal timing.	Continue ensuring that our contracts are robust and effective in managing this risk

Conclusion

We are committed to helping combat modern slavery and human trafficking within our business and supply chains.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes NewDay's modern slavery and human trafficking statement for the financial year ended 31 December 2022. The statement was approved by the Board of Directors of NewDay Cards Ltd and signed on its behalf by:



Paul Sheriff
Chief Financial Officer
22 June 2023