



# 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 2025 and is titled Modern Slavery Statement 2026.

## About PRA Group

PRA Group (UK) Limited, and its wholly owned subsidiary, PRA Group UK Portfolios Ltd, are companies registered in England and Wales, both having their registered office at Level 11, Riverside House, 2A Southwark Bridge Road, London SE1 9HA. PRA Group UK Portfolios Ltd was incorporated in November 2022 and is a debt purchase business, purchasing portfolios of regulated and unregulated debt from credit providers in the UK. PRA Group (UK) Limited is authorised and regulated by the Financial Conduct Authority and its colleagues and agents, located in UK offices, service, administer and/or collect on the debts owned by PRA Group UK Portfolios Ltd.

For the purposes of this statement, PRA Group (UK) Limited and PRA Group UK Portfolios Ltd are collectively referred to as PRA Group.

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 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 continues to assess that the risk of slavery or human trafficking existing within its supply chain overall is low. However, we acknowledge that slavery and human trafficking is prevalent in modern society and can be difficult to detect. Accordingly, 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 regarding 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 confirmation from potential suppliers of goods and services that they have taken steps to ensure slavery and human trafficking is not taking place within their organisation, or within their own supply chains.

As part of PRA Group's drive to identify and mitigate risk, its contracted suppliers of goods and services are required to confirm their compliance with all applicable legal and regulatory requirements.

All of this is managed 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.

As part of its audit process, PRA Group requires material contracted suppliers to confirm that they have taken steps to ensure slavery and human trafficking is not taking place within their organisation, or within their own 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 are tracked to closure.

PRA Group also includes questions related to Modern Slavery Act compliance within its seller due diligence questionnaire (prior to portfolio purchase).

## **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 its relevant employees and officers have high level awareness and understanding of the risks of slavery and human trafficking in supply chains, and within PRA Group's 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 of PRA Group. The Code identifies several different ways in which employees or third parties may raise issues or concerns. Any 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:

- PRA Group's modern slavery steering group has launched an internal information hub on the PRA Group intranet site to raise awareness of modern slavery and human trafficking among employees, as well as providing centralised access to guidance, resources and reporting channels;
- PRA Group has continued to develop its referral pathways with established (free service) debt management organisations, ensuring that customers in need of financial guidance and those affected by economic and financial abuse are directed to appropriate support;
- PRA Group has retained its partnership with an external provider of a free online benefits checker, giving access to this financial literacy resource to all customers;
- PRA Group remains an active supporter of the principles underpinning The Inclusive Economy Partnership Code of Practice, a government-backed initiative promoting better and fairer debt collection processes;
- PRA Group has renewed its sponsorship of The Money Advice Liaison Group, continuing to facilitate fortnightly member forum sessions aimed at improving outcomes for people in debt; and
- PRA Group has delivered employee wellbeing initiatives, including financial literacy seminars and workshops, to promote the financial resilience and welfare of its workforce.

### **Actions**

During the next financial year PRA Group intends to:

- Continue to refine and, where possible, strengthen its processes for identifying and assessing slavery and human trafficking risks within supplier onboarding, due diligence and audit procedures;

- Further advance the integration of the principles of BS 25700 – Organisational Responses to Modern Slavery (Guidance) into PRA Group's existing operational processes;
- Build on the internal information hub to further enhance awareness of modern slavery and human trafficking across all PRA Group staff;
- Continue to champion initiatives that support victims of financial and economic abuse and promote financial inclusion among PRA Group's customer base;
- Explore further initiatives to support the health, wellbeing and financial resilience of PRA Group's employees; and
- Identify additional areas within PRA Group's business and supply chains where more can be done to combat human exploitation and improve welfare outcomes.



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Lance Edward Brodie  
**Director**  
**PRA Group (UK) Limited**

Date: 3 June 2026



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Richard Owen James  
**Director**  
**PRA Group UK Portfolios Ltd**

Date: 3 June 2026