## Modern Slavery Act 2015 (the "Act")

This statement is the Slavery and Human Trafficking Statement of Thincats Group Limited and its subsidiary undertakings (together "**Thincats**") made pursuant to section 54 of the Act for the financial year ended 29 June 2022. A list of group companies to which this statement relates is set out at the end of this statement.

Thincats takes a zero tolerance approach to slavery and human trafficking.

## **Our Business**

Thincats provides secured loans to small and medium sized enterprises incorporated in the United Kingdom.

#### Supply Chain

We do not manufacture any products nor source any commodities. Our supply chain consists mainly of software as a service suppliers, as well as other IT related supplies, office supplies and other office related services.

#### Risk Assessment

Given the nature of our operations, Thincats has a low risk of slavery or human trafficking occurring in its supply chain. We will assess related risks at least annually, and will do so more frequently in the event that the nature of our business or our operating environment changes.

## **Our Policies**

We recognise our responsibility to behave ethically and treat all stakeholders fairly. We will not engage suppliers where we have reason to suspect that there is any slavery or human trafficking in their business or supply chain.

We operate a number of policies to ensure compliance with laws relating to employment rights and other human rights including:

- Anti bribery policy
- Anti harassment and bullying policy
- Disciplinary policy
- Grievance policy

#### **Due Diligence**

New joiners are subject to background checks prior to joining which would identify any criminal offences relating to the Act.

We undertake due diligence on new suppliers, intermediaries and borrowers, in part to identify any risks associated with slavery or human trafficking. Contracts entered into with suppliers generally include provisions requiring all parties to comply with applicable laws and regulations. Where appropriate, we will also include more specific terms in relation to modern slavery and human trafficking (for example, in contracts with cleaning contractors).

## **Measuring Effectiveness**

In the financial period ended 29 June 2022 there were no occurrences of modern slavery or human trafficking within the Thincats group or its suppliers.

# Our Plans for 2023

We are introducing a whistleblowing policy to ensure that staff have a means of raising any serious concerns. Training will be provided as part of the rollout of this policy to ensure that employees are aware that they can raise concerns anonymously and without fear of reprisal.

This statement was approved by the board of Thincats Group Limited on 10 March 2023 and will be reviewed annually.



Amany Attia Chief Executive Officer Thincats Group Limited 10 March 2023

# **List of Group Companies**

Thincats Group Limited (Company No. 13393055),
Thincats Limited (Company no 09707863),
Business Loan Capital Limited (Company No. 09867563),
ESF Loans Limited (Company No. 10725890),
TC Loans I Limited (Company No. 097212350,
TC Loans II Limited (Company No. 11680000),
TC Loans Limited (Company No. 13031559),
TC Security Trustee Limited (Company No. 12633574).