



Modern Slavery Statement

The Zinc Group (TZG)

Financial Year: 2025/26

1. Introduction

This statement is made by The Zinc Group ("TZG") in accordance with the principles of the Modern Slavery Act 2015 and outlines the steps we take to prevent modern slavery and human trafficking within our business and supply chains.

Although TZG does not currently meet the threshold requiring publication under Section 54 of the Modern Slavery Act 2015, we are committed to transparency and to preventing modern slavery and human trafficking within our operations and supply chains.

Modern slavery is a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, human trafficking, and exploitation. TZG maintains a zero-tolerance approach to such practices.

2. Our Organisation

TZG is a specialist credit management and debt recovery business operating within the consumer and commercial credit receivables sector and primarily within the UK.

Our workforce consists primarily of directly employed staff, and we engage a range of suppliers and third-party service providers to support our business operations.

3. Our Supply Chains

As a Financial Conduct Authority (FCA) regulated debt collection agency, TZG has a relatively low volume, service based and predominantly UK based supply chain. As a result, risks associated with country level governance, labour conditions and human rights are generally lower due to the UK's well established legal and regulatory framework.

Our suppliers include, but are not limited to, professional services providers, IT and technology vendors, office and operational service suppliers, and other business support providers.

While the majority of our suppliers operate in low-risk sectors and geographies, we recognise that risks may still exist and therefore apply proportionate due diligence measures as part of our supplier onboarding and review processes.



4. Our Policies and Governance

TZG has implemented a range of policies to support ethical conduct and prevent modern slavery, including:

- Modern Slavery Policy
- Code of Ethics
- Whistleblowing Policy
- Recruitment and Pre-Employment Screening Policies
- Procurement and Supplier Management Policy

These policies reflect our commitment to acting ethically, with integrity, and in compliance with applicable laws.

Governance oversight is provided by senior management, supported by the Compliance Function, which is responsible for monitoring adherence and reviewing policy effectiveness.

5. Due Diligence and Controls

TZG applies proportionate, risk based due diligence to manage modern slavery risks across its operations and supply chain. This includes:

- Supplier onboarding due diligence and risk assessment
- Review of supplier policies and controls where appropriate
- Adherence to our Supplier Code of Conduct
- Ongoing supplier review processes

We expect all suppliers and business partners to operate ethically and comply with applicable legislation, including legislation relating to modern slavery and human rights.

6. Risk Assessment and Management

Modern slavery risks are considered within our wider compliance and governance framework. Responsibility for oversight sits with the Compliance Function, supported by management teams responsible for implementation and monitoring.

Within our own operations, we maintain recruitment, pre-employment screening and right to work verification processes designed to support lawful and ethical employment practices.



Given the nature of our business, our predominantly UK based operations and our service based supply chain, we consider our exposure to modern slavery risks to be relatively low. However, we remain vigilant and continue to assess risks as part of our wider governance framework.

We review our policies and controls at least annually to ensure they remain effective and appropriate.

7. Training and Awareness

TZG provides modern slavery awareness training to employees as part of induction and as an annual refresher. This helps employees:

- Understand modern slavery risks and indicators
- Know how to raise concerns
- Recognise their responsibilities under Company policies

8. Reporting Concerns and Whistleblowing

TZG encourages all employees, contractors, suppliers, and third parties to report any concerns related to modern slavery or unethical practices and maintains arrangements that allow concerns to be raised safely and without fear of retaliation.

Employees are encouraged to report concerns through internal reporting channels in accordance with the Whistleblowing Policy. Suppliers, contractors, and other third parties may raise concerns through their usual business contact or other available reporting channels.

Concerns are treated seriously and investigated appropriately, with protection from retaliation for those raising concerns in good faith.

Where appropriate, concerns may also be reported to external authorities, including the UK Modern Slavery Helpline.

9. Effectiveness and Monitoring

TZG is committed to continually reviewing and strengthening its approach to preventing modern slavery and human trafficking.

We monitor the effectiveness of our controls through:

- Supplier due diligence and onboarding processes



- Employee training and awareness activities
- Review of concerns raised through whistleblowing and internal reporting channels
- Periodic review of our policies and procedures

We will continue to review our approach and implement improvements where appropriate.

10. Remediation

If modern slavery or exploitation is identified, TZG will take appropriate action, which may include:

- Investigating and addressing the issue
- Working with relevant parties to implement corrective measures
- Terminating relationships where standards are not met

We aim to ensure that any response prioritises the safety and wellbeing of affected individuals.

11. Approval

This statement was approved by the Board of Directors of The Zinc Group on 16/08/26 and will be reviewed annually.