



EML Group Modern Slavery Statement 2021.

Money in Motion



EML Group Modern Slavery Statement 2021

1. Introduction

At EML our purpose is to inspire transformative digital change for our customers and communities. Our mission is to create awesome, instant and secure payment solutions that connect our customers to their customers, anytime, anywhere wherever money is in motion, and our vision is to offer customers a feature rich, fully embedded payment solution via a simple, single touchpoint.

Our Purpose, mission and vision are all underpinned by our values of Openness, One Team, Simplicity and Awesomeness which in turn are supported by the EML Code of Conduct Policy (**Code**). Our values and Code are fundamental to who we are and the way in which we operate.

In staying true to our purpose, mission, vision and values we are fully committed to ensuring there is transparency in our business and in our approach to prevent any form of modern slavery, violation of human rights and/or human trafficking in our operations or supply chain. We also expect the same high standards from all our suppliers.

This Modern Slavery Statement (**The Statement**) covers the period 1 July 2020 to 30 June 2021. It applies to EML, including, EML Payment Solutions Limited (**EPSL**), Prepaid Financial Services (Ireland) Limited (**PFS**), and all subsidiary companies ("**Group**"). It has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)* and the *Modern Slavery Act 2015 (UK)* (collectively, **the Modern Slavery Acts**).

The Statement outlines the actions EML has taken across the Group to identify and address the risks of modern slavery to its business operations and supply chain and was approved by the EML Board on 16 December 2021.

2. Business Structure

Who we are and what we do

EML is a financial technology Company listed on the Australian Securities Exchange. As at 30 June 2021, we had 540 employees operating from 11 offices (including Satellite offices). Working globally across ten countries located throughout Australia, the United Kingdom (UK), Europe and North America.

EML provides an innovative payment solutions platform, helping businesses all over the world create awesome customer experiences. Wherever money is in motion, our agile technology can power the payment process, so money can be moved quickly, conveniently and securely. We offer market-leading programme management and highly skilled payments expertise to create customisable feature-rich solutions for businesses, brands and their customers.

EML are proud to power many of the world's top brands processing \$19.4 billion in GDV for FY21 across 27 countries in Australia, EMEA, and North America. Our payment solutions are safe and secure, easy and flexible, providing customers with their money in real-time.

Further details on our activities, performance, products and services can be found on our website at www.emlpayments.com/company/investor-centre

Our Corporate Values and commitment

Our values of Openness, One Team, Simplicity and Awesomeness are supported by our Code of Conduct to guide our staff in how they should act and conduct themselves.

EML's commitment to its values, ethics and compliance foster a culture that, we believe attracts the highest calibre employees, and builds and enhances our customer relationships. Our values also underpin our approach to modern slavery and human rights issues, be it in the communities we work in, our supply chain and partnerships, or our employees.

We are committed to acting ethically throughout our business by complying with all applicable legal obligations including the Modern Slavery Acts and we take a zero-tolerance approach to any form of modern slavery.

Our Group Human Rights and Supplier Code of Conduct Policies further reflect our commitment to acting ethically and with integrity in all our business dealings and relationships, and we are committed to implementing and enforcing effective systems and controls across our business and supply chains in support of these commitments.

EML Group Modern Slavery Statement 2021 continued

EML Employees, Policies and Procedures

The values of compliance, ethics, openness, fairness and impartiality guide our employment practices. We use reputable recruitment partners when sourcing employees and contractors across the globe who are required to comply with all applicable legislation when carrying out activities on behalf of EML.

We have in place several policies to help guide our employees, including:

- Code of conduct Policy
- Group Whistleblower Policy
- Diversity and Inclusion Policy
- Anti-Bribery & Corruption Policy
- EML Group Human Rights Policy
- EML Supplier Code of Conduct Policy

In addition, our global onboarding and training for all staff covers obligations under our policies on issues such as health, safety, wellbeing, harassment and bullying, discrimination and privacy.

Our Employee and Supplier Code of Conduct Policy requires that all employees and EML Suppliers comply fully with the content and spirit of all laws and regulations for the regions in which we operate, and to not knowingly participate in any illegal or unethical activity.

Our policies are made available to all staff and suppliers via our Company websites and our Group Whistleblower Program and Policy ensures any concerns can be raised safely, quickly and confidentially through various internal or external channels including via our external whistleblower hotline operated by Your Call.

3. Risk of modern slavery practices in our operations and supply chain

EML recognize that modern slavery is a significant worldwide problem. According to the Walkfree Foundation 2018 'Global Slavery Index Report, over 40 million people are living in modern slavery across the globe*. Despite the prevalence of the issue it is often difficult to identify in global supply chains.

We continue to assess our business model and geographical footprint. Given the level of control we have over our operations, including comprehensive labour and risk management systems, and the location of our offices, we believe that our material exposure to modern slavery is limited to our supply chain.

Within our supply chain we believe our risk is further limited to a narrow set of industries ranging from technology companies providing hardware, as well as outsourced service providers to businesses that provide equipment and services for our employees including office furniture, office supplies, promotional materials, food and beverage and maintenance and cleaning.

The systems and methods we use to contract with suppliers are non-complex and include maintaining a preferred supplier list.

We have also analysed country risk associated with our suppliers and main business locations. Based on the information sourced via the Global Slavery Index, we currently do not believe we have any material exposure to suppliers who are based in countries that have a high risk of modern slavery.

Notwithstanding, EML acknowledges that it is vital that we continually review our supply chain and operations to reduce the possibility that any of our business activities contribute to, or facilitate, any forms of modern slavery.

We are pleased to confirm that we have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers. If we were, we would take appropriate action immediately and inform the relevant authorities.

* Walk Free Foundation, Global Slavery Index - 2018

EML Group Modern Slavery Statement 2021 continued

4. Our actions and progress during 2021

During 2021 our actions and progress including our risk management and due diligence processes included:

Risk assessment of new and existing suppliers

In FY21 we continued develop the risk assessment methodology introduced when completing our the EML FY20 Modern Slavery Statement (our first Modern Slavery Statement) for the Group's existing suppliers. The assessment reviewed risk factors including industry sector, geographic location and any Human Rights / Modern Slavery reporting the individual supplier produced in order to determine if suppliers operated in high risk locations, the type of entity providing the goods or services to EML and what level of Modern Slavery reporting the supplier made (if any).

The FY21 review concluded that EML had business dealings with over 400 active suppliers with whom it directly procures goods and services through. These suppliers are located in the countries in which we operate and do not pose an elevated concern in respect to modern slavery risk.

We updated and expanded our Whistleblower Policy

EML's Whistleblower Program and Policy was reviewed in December 2020, the policy was expanded and a Group Whistleblower Policy was introduced so that employees and suppliers anywhere in the world can promptly and safely raise concerns. In addition an independent whistleblowing service operated through Your Call was introduced in January 2021 so that our staff and/or suppliers could feel safe and confident in making anonymous disclosures.

Group Human Rights / Anti Slavery Policy

In February 2021 the Board approved the EML Group Human Rights Policy to support the Company's Code of Conduct Policy.

The Group Policy is guided by the United Nations' Universal Declaration of Human Rights and the Policy highlights the way in which human rights are respected by:

- Treating our employees with respect, providing a safe, fair and non-discriminatory workplace
- Promoting and respecting diversity and inclusion within our business
- Ensuring that we are complying with all relevant laws and regulations in each of our markets, and
- Not tolerating any form of modern slavery or human trafficking within our operations or supply chains.

Supplier Code of Conduct Policy / Supplier Questionnaires

In October 2021 The Board approved EML's Supplier Code of Conduct setting out the standards and the expectations applicable to all EML Suppliers regarding ethics and business conduct, compliance with the law, Modern Slavery, Human Rights and Labour Standards.

EML has commenced and will continue to include the Supplier Code of Conduct in our onboarding procedure for new suppliers and communicate it to existing suppliers.

Introduction of Modern Slavery Provisions into Supplier Contracts

In 2021 EML introduced specific clauses regarding compliance with the Acts for all new contracts to protect against modern slavery.

5. Training

We understand that one of the most effective tools for mitigating EML's modern slavery risks is to raise awareness of modern slavery risks through education.

As part of our overall governance framework Global compliance training covering obligations under our group policies on issues such discrimination, bullying and harassment, human rights, antibribery and corruption is becoming mandatory through EML's Learning Management System (**LMS**) with training monitored and reported through our People and Culture team. Employees who fail to complete mandatory training without a valid reason may face disciplinary action.

EML Group Modern Slavery Statement 2021 continued

6. Looking ahead

We understand our key modern slavery risks, have put policies and processes in place to help us address them and will regularly assess the effectiveness of our actions for continual improvement.

In the financial year ending 30 June 2022 we aim to:

- Continue to include EML's Supplier Code of Conduct in our onboarding procedure for new suppliers and communicate it to existing suppliers;
- Undertake reviews of supplier documentation and perform assessments of supplier practices as part of EML's continuous improvement plan to monitor our suppliers compliance with the law;
- Continue to distribute questionnaires and obtain attestations for suppliers identified as "high risk";
- Continue to make sure that our policies and recruitment processes are appropriate to protect against modern day slavery and human trafficking; and
- Continue to develop and deliver modern slavery awareness training for all staff through the EML LMS.

We will continue to reassess the risks in our operations and our supply chain to make sure the steps we take to protect against modern day slavery and human trafficking are relevant and effective.

7. Impact of COVID-19 to our supply chain

EML are pleased to report that it has not identified an increased risk of modern slavery to workers in its operations or supply chain for the period 1 July 2020 to 30 June 2021 as a result of the ongoing impacts of COVID-19, and is committed to maintaining supplier relationships and fostering open communication with suppliers about COVID-19 associated risks.

8. Consultation and Board Approval

Our Modern Slavery Statement was prepared by the Group Head of Corporate Governance (with input from our Risk & Compliance, IT, People and Culture and Finance teams) and reviewed by our Audit and Risk Committee Chairman. It was circulated to the directors of EML for comment and review via EML's Culture, Governance and Nominations Committee prior to its formal approval by the Board on 16 December 2021.



Tom Cregan

Managing Director and Group Chief Executive Officer

16 December 2021