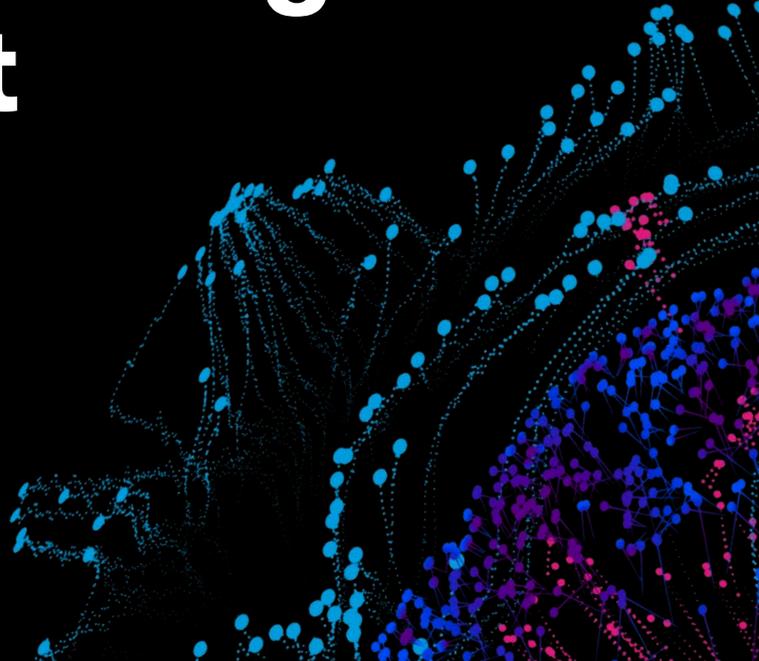




EMI.

# Modern Slavery Statement 2020.

Money in Motion



# Modern Slavery Statement 2020

## 1. Introduction

This is the first Modern Slavery Statement (**The Statement**) for EML Payments Limited (**EML**). It covers the period 1 July 2019 to 30 June 2020 and applies to EML, Prepaid Financial Services (Ireland) Limited (**PFS**) (acquired 1 April 2020), and all subsidiary companies (**Group**). The Statement has been prepared in accordance with the *Australian Modern Slavery Act (2018)* and the *United Kingdom Modern Slavery Act (2015)* (collectively, **the Modern Slavery Acts**).

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 and/or human trafficking in our operations or supply chain and we expect the same high standards from our suppliers.

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 February 2021.

## 2. Business Structure

### Who we are and what we do

EML is a financial technology (Fintech) company listed on the Australian Securities Exchange. As at 30 June 2020, we had 444 employees operating from 11 offices (including satellite offices) working globally across four continents located throughout Australia, the United Kingdom (UK), Europe, the United Arab Emirates (UAE) and North America.

As a global payments provider we develop tailored payment solutions for brands to make their customers lives simpler. Through next-generation technology, our portfolio of payment solutions offers innovative options for disbursement payout's, gifts, incentives and rewards. We're proud to power many of the world's top brands and process over \$18 billion in GDV each year across 28 countries in Australia, EMEA, and North America. Our payment solutions in 27 currencies are safe and secure, easy and flexible, providing customers with their money in real-time. We know payments are complex, that's why we've made the process simple, smart and straightforward, for everyone.

Further details on our activities, performance, products and services can be found on our website [www.emlpayments.com/investors/](http://www.emlpayments.com/investors/)

### Our Corporate Values and commitment

Our corporate values are supported by our Code of Conduct to guide our staff in how they should act and conduct themselves.

Our commitment to our 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 Modern Slavery Policy further reflects our commitment to act 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.

# Modern Slavery Statement 2020 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 our behalf.

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 and Corruption Policy
- Group Human Rights and Modern Slavery 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 Code of Conduct Policy requires that all employees 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 via our Group wide intranet and the EML website. Our Whistleblower Program and Group Whistleblower 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 recognise that modern slavery is a significant worldwide issue. According to the Walk Free 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 have assessed 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, equipment and services for our employees such as computer equipment and office furniture to outsourced service providers supplying promotional materials, food and beverage, maintenance and cleaning. In addition, 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 the location of our main business operations. Based on 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 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.

## **4. Our actions and progress during FY20**

During the FY20 our actions and progress including our risk management and due diligence processes included:

### **Risk assessment of existing suppliers**

One of the first steps we undertook was to develop a risk assessment methodology and apply this to our Group's existing suppliers. The assessment reviewed risk factors including industry sectors and geographic locations to determine if suppliers operated in high risk locations and/or were the type of entity providing goods or services to EML in high risk sectors.

The review concluded that EML had business dealings with many active suppliers with whom it directly procures goods and services through (our Tier 1 suppliers). These suppliers are all located in countries in which we operate and do not pose an elevated concern in respect to modern slavery risk.

\* Walk Free Foundation, Global Slavery Index - 2018

# Modern Slavery Statement 2020 continued

## We introduced a Whistleblower Policy updated our Code of Conduct

We introduced a Whistleblower Policy in November 2019 as a key way for our employees and suppliers to raise concerns about improper conduct at EML, this included conduct relating to modern slavery and in June 2020 we updated our Code of Conduct Policy, which sets out how we do business at EML.

## Preferred Supplier Lists

Preferred Supplier lists are maintained and used to ensure reputable suppliers are used for services including recruitment, professional services, travel and accommodation, equipment and maintenance.

## 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. EML has recently upgraded its employee training program and learning management systems (**LMS**) to ensure compliance training can be conducted, reported, recorded and monitored for all staff.

As part of our overall governance framework global compliance training covering obligations under our group policies on issues such as discrimination, bullying and harassment, human rights, bribery and corruption will become mandatory 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.

## 6. Recent developments & 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.

### Whistleblower Program & Group Human Rights and Modern Slavery Policy

- In December 2020 our Whistleblower program and policy was reviewed, 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 was introduced so that people could feel safe and confident in making anonymous disclosures.
- Our existing region specific Modern Slavery /Anti Slavery Policies were used to develop our Group Human Rights and Modern Slavery Policy that is guided by the United Nations' Universal Declaration of Human Rights and the ten principles of the UN's Global Compact.
- Our Group Human Rights and Modern Slavery 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.

Our Group Human Rights and Modern Slavery Policy supports our Code of Conduct Policy and was formally approved by the Board on 16 February 2021.

### The Year ahead

In the financial year ending 30 June 2021 we aim to:

- Implement a supplier code of conduct policy to our onboarding procedure for new suppliers and communicate it to existing suppliers;
- Review and where relevant improve our due diligence process to assess and review our new and existing suppliers' reputation, and monitor their compliance with the law;
- Develop and distribute questionnaires / attestations for any supplier identified as "high risk";
- Include specific clauses regarding compliance with the Modern Slavery Acts for all new supplier contracts;
- Continue to ensure our policies and recruitment processes are appropriate to protect against modern day slavery and human trafficking; and
- 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.

# Modern Slavery Statement 2020 continued

## 7. Impact of Covid-19 to our supply chain

We are pleased to report that we have not identified an increased risk of modern slavery to workers in our operations or supply chain for the period 1 July 2019 to 30 June 2020 as a result of Covid-19, and we are committed to maintaining supplier relationships and fostering open communication with our suppliers about Covid -19 risks.

## 8. Consultation and Board Approval

Our Modern Slavery Statement was prepared by our Head of Corporate Governance (with input from our Legal, Risk & Compliance, People and Culture and Finance teams). The Statement was reviewed by our Group General Counsel and Audit and Risk Committee and circulated to the directors of EML for comment prior to its formal approval by the Board on 16 February 2021.



**Tom Cregan**

Managing Director and Group Chief Executive Officer

23 February 2021