

## **PAYMENTSENSE LIMITED t/a Paymentsense**

### **MODERN SLAVERY STATEMENT**

#### **Introduction**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Paymentsense Limited, Paymentsense Ireland Limited and relevant group companies (together, "Paymentsense") in relation to the prevention of modern slavery and human trafficking in our business and supply chain for the financial year ended 31 March 2024.

Paymentsense is committed to building an ethical and sustainable business and this includes improving our practices to combat slavery and human trafficking in our business and supply chain. We address the risks of modern slavery by acting ethically and with integrity in our business relationships. Paymentsense acknowledges the importance of continuing to review our supply chains to reduce the possibility that any of our business activities contribute to or facilitate modern slavery.

#### **Our Organisation**

Paymentsense is one of Europe's largest merchant service providers, delivering payment solutions to over 150,000 small and medium sized businesses under multiple brands.

We have around 1166 staff and engage self-employed field sellers, most of whom are based in the United Kingdom. Our staff are not in any category which is generally seen to be vulnerable to modern slavery, so our focus is to ensure there are policies and procedures in place in relation to our contractors and suppliers.

#### **Our supply chain**

Paymentsense uses a range of suppliers who supply goods for sale, provide services and support our operations.

Having reviewed our business operations and relationships, we believe that the area of highest modern slavery risk is in the supply chain supporting the manufacture of goods and materials for sale to our merchants either by Paymentsense or other entities involved in providing goods and services to our merchants in connection with the Paymentsense services, particularly where those suppliers are in high-risk countries and/or manufacturing goods.

#### **Due diligence**

Paymentsense carries out due diligence on suppliers in high-risk areas and has developed procedures for assessing those suppliers. This ensures that we only select suppliers who comply with our high standards and policies.

Paymentsense has an internal team responsible for assessing information and documentation submitted by suppliers. Should a supplier fail or refuse to provide any information required or fail to meet

Paymentsense's expectations, this may result in Paymentsense not entering into a relationship with them or terminating any current relationship.

## **Policies**

Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We adopt and communicate to our staff procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with anti-human trafficking and anti-modern slavery legislation.

Paymentsense has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These policies are reviewed and updated regularly and include our whistleblowing policy which encourages staff to report any concerns through multiple channels, including any related to modern slavery/trafficking and child and forced labour.

Our values, which are embedded throughout our business, set the parameters for how we expect our people to behave with colleagues, customers, and others. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted.

In terms of employment, we have robust recruitment processes in line with UK employment laws, including 'right to work' document checks, contracts of employment and checks to ensure everyone employed is 16 and above. We also offer market-related pay and wellbeing activities and initiatives to support our staff's physical and mental wellbeing.

## **Further steps**

We will continue to review our procurement process and engage with our suppliers. We provide mandatory training on modern slavery to all staff which must be completed annually. This training is reviewed and updated every year by our compliance and legal teams to ensure it is up to date.

## **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. Our compliance, legal, human resources and procurement teams all work to ensure our employees, suppliers and contractors comply with our values.

## **Our effectiveness in combating slavery and human trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

### **KPI 1: Risk Assessment**

We maintain an onboarding process where we invite all high-risk suppliers to complete our modern slavery risk assessment. We ensure that this risk assessment is reviewed and updated annually. In addition, we re-verify and re-confirm the modern slavery information collected during the supplier onboarding phase during the performance review process of each critical supplier (i.e. one that provides us with a material service).

## KPI 2: Commercial Capability

We ensure that our compliance, legal, human resources and procurement teams continue to receive access to ongoing updates in respect of business and human rights, specifically modern slavery.

### Further steps

In order to strengthen the implementation of our policies and procedures relating to Environmental, Social and Governance matters, we intend to take the following further steps to combat slavery and human trafficking:

- Continue to ensure that our KPIs continue to function to help us understand whether the action we are taking is working well and where we need to improve.
- Continue to place a stronger emphasis on the management of modern slavery risk in supplier performance review conversations.
- Review new commercial agreement business cases for modern slavery risk management and prevention.

### Approval

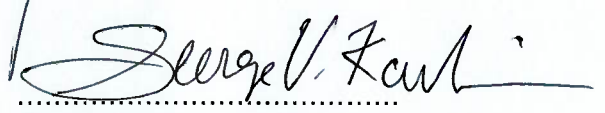
This statement has been approved by the Directors of Paymentsense Limited.



.....

Jan Farrarons

Director of Paymentsense Limited



.....

George Karibian

Director of Paymentsense Limited