



*This Statement was lodged with the Attorney General's Department (AGD) on 12 December 2024.*

**Note:** Pursuant to section 19(2) of the Modern Slavery Act, the AGD will register all statements properly submitted to it. Prior to the statement being published on the Register, the statement will be reviewed by the AGD. This process can take some time, particularly during peak periods of submission.

# EML Group Modern Slavery Statement 2024.

Money in Motion



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## 1. Introduction

This Modern Slavery Statement (Statement) is made on behalf of EML Payments Limited (EML) and its wholly owned subsidiaries including Prepaid Financial Services (Ireland) Limited (PFS) and Sentenial Limited (Sentenial) and the subsidiary entities it owns or controls operating in Australia, the United Kingdom, Europe, and the United States (Group).

The Statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2015 (UK) (collectively, the Modern Slavery Acts) and 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 with respect to the financial year ending 30 June 2024. The Statement was approved by the EML Board on 25 November 2024.

## 2. About EML

### Who we are and what we do

EML Payments is an Australian Stock Exchange (ASX:EML) listed global payments company that operates in Australia, the UK, Europe, USA and Canada. Our customers are diverse and include government, retail brands, financial services and human capital management companies. As at 30 June 2024 EML had 458 fixed term employees.

We offer gift, incentive, disbursement and reloadable cards and newer innovations in payments including open banking and real-time payments. The breadth of EML's offerings and industry sectors is unrivalled in the payments space and we are highly regarded for our tailored, feature-rich, white labelled solutions.

EML currently has over 800 suppliers in the regions we operate in. We seek to do business with suppliers and other third parties that have similar values, ethics, and sustainable business practices, including those that relate to human rights and modern slavery.

Further details on our activities, performance, products, and services can be found on our website at <https://www.emlpayments.com/>

### 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 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 and Modern Slavery Policy
- EML Supplier Code of Conduct Policy

In addition, our onboarding and training programs address employee obligations encompassing key policy areas including health, safety, wellbeing, harassment, bullying, discrimination, and privacy.

Our Employee and Supplier Code of Conduct Policy requires that all employees and suppliers comply fully with the 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 employees and suppliers via our company website 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 acknowledges the risks of modern slavery globally and is committed to working to prevent modern slavery and human trafficking in our business and supply chain.

We continue to assess our business model and geographical footprint. Given the level of control we have over our operations, managed through our frameworks and policies, 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, businesses that provide equipment and services for our employees including office furniture, office supplies, promotional materials, food and beverage and maintenance and cleaning.

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.

\* Walk Free Foundation, Global Slavery Index - 2023

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 suspect modern slavery, we will ensure that appropriate action is taken including:

- Investigating the alleged conduct, either internally or externally via an independent third party; and
- Engaging with suppliers to express our concerns and work with them to address and remediate the situation.

If a supplier is unwilling or unable to remediate, we would take the necessary action, including:

- Abstaining from entering a contractual arrangement or terminating the contract; and/or
- Reporting the suspected conduct to the relevant authorities.

### 4. Key initiatives/actions in FY24

During the reporting period we continued to ensure compliance with our modern slavery commitments, including completion of the following key steps:

#### **Risk assessment of new and existing suppliers**

A risk assessment of all new FY24 suppliers was undertaken. The assessment reviewed risk factors including industry sector and geographic location. The supplier's commitment to addressing the risks of modern slavery and human rights, as outlined in their published Modern Slavery Statement, was included in the assessment.

The FY24 review concluded that EML had business dealings with over 800 suppliers with whom it directly procures goods and services through. The majority of suppliers are located in the countries in which we operate and do not pose an elevated concern in respect to modern slavery risk.

## **Regular review of Corporate Policies**

The Board regularly review Corporate Governance policies including EML's Group Human Rights and Modern Slavery Policy to support the Company's Code of Conduct Policy.

## **Group Human Rights and Modern Slavery Policy**

EML's Human Rights and Modern Slavery policy sets out the standards and the expectations of those who perform or provide goods and services to, for, or on behalf of EML (including contractors, consultants, advisors and suppliers) will also comply with the principles and standards detailed in the policy.

## **Supplier Code of Conduct Policy**

EML's Supplier Code of Conduct sets out the standards and the expectations of our suppliers in relation to ethics, business conduct, compliance with the law, Modern Slavery, Human Rights and Labour Standards.

The Company distributes its Supplier Code of Conduct to all suppliers and conducts risk-based reviews with existing suppliers in accordance with the risk factors outlined above.

## 5. Measuring effectiveness

The distribution of EML's Supplier Code of Conduct and individual supplier due diligence and risk assessment will continue with a particular emphasis on "high risk" sectors and geographic regions.

EML has not identified any significant indicators of modern slavery within its operations or supply chain within the reporting period. There have been no disclosures regarding Modern Slavery made to EML's Whistleblower hotline.

## 6. Training

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

Compliance training covering obligations under our policies on issues such as discrimination, bullying and harassment, human rights, bribery 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.

## 7. 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 2025 we aim to:


- Include EML's Supplier Code of Conduct in our onboarding procedure for new suppliers.
- Undertake risk-based reviews of supplier documentation and perform assessments of supplier practices as part of EML's continuous improvement plan to monitor our supplier's compliance with the law.
- Continue to distribute questionnaires and obtain attestations for suppliers identified as "operating within a "high risk" sector.
- Continue to make sure that our policies and recruitment processes are appropriate to protect against modern slavery and human trafficking; and
- Continue to develop and deliver modern slavery awareness training through EML's induction program and 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 slavery and human trafficking are relevant and effective.

## 8. Consultation and Board Approval

Our Modern Slavery Statement was prepared by Group Chief Risk and Compliance Officer and reviewed by our Audit and Risk Committee (ARC) Chairman. The FY24 Modern Slavery Statement was circulated to the directors of EML for comment and review prior to its formal approval by the Board on 25 November 2024.

We consulted the relevant companies we own or control in the development of this Statement.



**Ron Hynes**

Managing Director and Chief Executive Officer

25 November 2024