



Group Human Rights and Modern Slavery Policy.

Money in Motion



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1. Introduction

At EML Payments Limited (**EML, Company**) and its subsidiaries (**Group**), our vision is to be recognised as a world-leading payments company, delivering innovative solutions with integrity and responsibility. As a global organisation, we recognise the responsibility we have in upholding human rights principles and are committed to operating our business in a manner consistent with respecting fundamental human rights and preventing modern slavery. We respect the rights and interests of the communities in which we operate, those who may be impacted by our activities and those within our supply chain.

Modern slavery is a significant global issue that can occur anywhere and is not isolated to developing countries and economies. It takes various forms, all of which have in common the deprivation of a person's liberty by another for personal or commercial gain. Forms of modern slavery include, but are not limited to, forced or compulsory labour, domestic servitude, trafficking in persons, debt bondage, sexual exploitation, criminal exploitation, forced marriage, forced prison labour and child labour.

This policy is informed by leading international standards including the United Nations' Guiding Principles (**UNGP**) on Business and Human Rights, the Universal Declaration of Human Rights, and the United Nations Global Compact.

2. Purpose and Scope

This policy sets out EML's approach to human rights and modern slavery, outlining the principles, responsibilities, and measures that guide our business and supply chain practices. It ensures compliance with global standards, evolving regulatory requirements, and the EML Supplier Code of Conduct.

This policy applies to all directors, employees, contractors, and temporary staff of EML and its subsidiaries (**EML personnel**), as well as all suppliers, consultants and third parties providing goods and services to, for, or on behalf of EML and its subsidiaries.

3. Principles

EML is committed to preventing and eliminating the risk of modern slavery within our business, our people or any of our business relationships, upholding the following principles throughout our operations and supply chain:

- **Respect for Human Rights:** EML operates in accordance with the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and all applicable laws.
- **Safe and Inclusive Workplace:** We provide a fair, safe, and non-discriminatory environment, upholding freedom of association and collective bargaining.
- **Zero Tolerance for Modern Slavery:** EML prohibits child labour, forced, bonded, or compulsory labour, involuntary prison labour, and all forms of modern slavery.
- **Diversity:** We value diversity in our workforce, customers, and suppliers.
- **Legal Compliance:** Where local standards differ from EML's, the higher standard applies.

4. Modern Slavery Measures

EML takes a proactive approach to identifying and managing modern slavery risks in its supply chain:

- We conduct risk assessment reviews of industry sector, geographic location and type of entity providing goods or services to identify "high risk" suppliers.
- All supply chain lines are subject to continual risk assessment in relation to modern slavery, with high-risk suppliers subject to additional scrutiny.
- Where applicable, we obtain warranties from suppliers confirming compliance with the principles in this policy, and with their own human rights and modern slavery obligations.
- We expect all suppliers to comply with all applicable laws and regulations, maintain ethical standards, and ensure safe, inclusive, and non-discriminatory workplaces.
- We reserve the right to review supplier documentation, conduct audits, and discontinue relationships with suppliers who fail to comply.
- We regularly review and update our risk assessment processes and supplier engagement to reflect changes in legislation, industry standards, and emerging risks.
- We publish an annual Modern Slavery Statement detailing actions taken, effectiveness, and future plans.

5. Reporting and Remediation

All EML personnel, suppliers and stakeholders are encouraged to report any perceived instances of unethical or illegal conduct – including in relation to human rights either internally to their manager or externally via our Whistleblower Hotline. For further information or to report concerns, refer to EML's Group Whistleblower Policy at <https://www.emlpayments.com/company/investor-centre/corp-governance/> or Your Call Whistleblowing Solutions at <https://www.YourCall.com.au/report>.

Where adverse human rights impacts are identified, EML will provide for, or cooperate in, remediation, including corrective action, supplier disengagement, and support for affected individuals.

6. Training

EML ensures all personnel are equipped to uphold this policy by providing new personnel with training on this policy during induction and providing existing personnel with regular updates on this policy.

7. Consequences of a Breach

EML will take appropriate action in response to breaches of this policy, including disciplinary action against individuals or termination of relationships with suppliers.

8. Policy Ownership and Review

This policy is owned by the Chief Risk and Compliance Officer (CRCO) of EML. The Board, through the Audit and Risk Committee (**ARC**), maintains oversight of all activities relating to compliance, including human rights, to ensure that our actions continue to be defined by our values and code of conduct.

This policy is subject to annual review, and any material amendments must be approved by the EML Board through the ARC.