



# Group Human Rights and Modern Slavery.

Money in Motion



# Group Human Rights and Modern Slavery

## 1. Introduction, Commitment and Purpose

EML Payments Limited (**EML, Company**) and its subsidiaries (**Group**) 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.

As a global company we recognise the responsibility we have in upholding human rights principles and are committed to operating our business in a manner consistent with the United Nations' Guiding Principles (**UNGP**) on Business and Human Rights.

**The purpose of this policy is to:**

- a. set out EML's approach to human rights issues and the core principles and values that we uphold.
- b. set out employee responsibilities to monitor and report suspected human rights issues, and provide information and guidance on how to deal with such issues; and
- c. prevent any form of modern slavery or human trafficking from occurring within our business operations or supply chains.

## 2. Policy Application

This policy applies across the Group to all directors and employees (including contractors and temporary staff) of EML (**EML personnel**).

EML expects that 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 this policy.

## 3. Principles

EML's approach and respect to human rights is underpinned by our values and our strategic objectives to uphold the commitments we make to our stakeholders. We care about and are committed to respecting human rights and ensuring that our people, partners, and suppliers comply with all laws that seek to preserve those rights. We achieve this by:

- Treating our employees with respect and providing a fair, safe and non-discriminatory working environment that is free from harassment, bullying or victimisation.
- Upholding the freedom of association and recognising the right to collective bargaining.
- Undertaking initiatives to promote greater environmental responsibility.
- Being an inclusive employer, promoting and valuing diversity within our workforce, respecting the diversity of our customers and suppliers, and where identified addressing exclusion.
- Closely monitoring and complying with all applicable laws and regulations that support human rights in communities and jurisdictions in which we operate, and where differences exist between our own standards and local customs, rules, or regulations, applying the higher standard.
- Not tolerating or supporting the use of child labour, forced, bonded or compulsory labour or any other forms of modern slavery.
- Requiring that all EML personnel receive appropriate human rights and cultural training and guidance.
- Being vigilant and promptly reporting any breaches of, or suspicious behavior related to this policy either internally or via EML's external whistleblowing hotline operated by Your Call.
- Communicating this policy and our commitment to human rights to all stakeholders.
- Committing to assessing and addressing human rights risks and impacts in our operations, supply chain and business operations through an ongoing process of human rights due diligence.
- Committing to maintaining effective grievance mechanisms to support the reporting and remediation of human rights concerns. Where we identify that we have caused, contributed to, or been directly linked to an adverse human rights impact, we are committed to providing for, or cooperating in its remediation; and
- Committing to tracking the effectiveness of our human rights policies and processes, and to continually improve our approach to human rights.

## 4. Forms of Modern Slavery

Modern slavery is a significant global issue that can occur anywhere and is not isolated to developing countries and economies. Modern slavery takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them 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.

EML are committed to preventing and eliminating the risk of modern slavery within our business, our people or any of our business relationships by training our people to identify and report suspected human rights issues and requiring that the third parties we work with have their own policies and procedures in place to adequately identify and prevent human rights violations or modern slavery issues.

## 5. Modern Slavery measures

In order to achieve the principles and commitments set out in this policy, EML has taken the following steps to assess the modern slavery risks in its supply chain:

- Apply a risk assessment review to the industry sector, geographic location and type of entity providing goods or services to identify if it is a "high risk" supplier.
- All supply chain lines will be continually risk assessed and managed in relation to modern slavery and any high- risk suppliers audited; and
- Wherever possible, EML will obtain warranties from suppliers that they are compliant with the principles in this policy, and with their own human rights and modern slavery obligations.

## 6. Complaints, Breaches, and Reporting

EML strives to achieve and maintain a culture of openness that encourages integrity and accountability.

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 regarding our external Whistleblower hotline, please refer to EML's Group Whistleblower Policy at <https://www.emlpayments.com/company/investor-centre/corp-governance/>.

## 7. Training

Training on this policy will include:

- new EML personnel will undertake training on this policy as part of their induction process; and
- existing EML personnel will receive regular updates on this policy as part of their ongoing training.

## 8. Consequences of a Breach

Any breaches of this policy may result in EML taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

## 9. Review of this Policy

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.