

# Global Payments Modern Slavery Statement

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## 1. Introduction

This Statement covers the activities of Global Payments Australia 1 Pty Ltd and its subsidiaries that are reporting entities for the purposes of the *Modern Slavery Act (Cth) 2018*. Global Payments Australia 1 Pty Ltd is a subsidiary of Global Payments Inc., an American financial technology company listed on the New York Stock Exchange. As a global business, corporate citizenship is fundamental to our values and who we are, from philanthropy, volunteerism and environmental stewardship to diversity, corporate governance, ethics, data privacy and data security.

In addition to Global Payments Australia 1 Pty Ltd, its subsidiaries that are reporting entities for the purposes of the *Modern Slavery Act (Cth) 2018* are Ezidebit Pty Ltd, Web Active Corporation Pty Ltd (trading as Eway) (collectively the “**Payments Arm**”), Sentral Pty Ltd, Storman Holdings Pty Ltd and Our Online Canteen Pty Ltd (collectively the “**Software Arm**”). The Payments Arm is a Business-to-Business (B2B) service provider of domestic payment-related products. It is also a provider of fraud prevention solutions and technology to support our merchants with card compliance obligations (PCI-DSS).

- **Web Active Corporation Pty Ltd** trading as Eway facilitates the acceptance of online payments for merchants (e-commerce payment processing).
- **Ezidebit Pty Ltd** provides electronic payment processing such as Direct Entry, BPAY, eftpos and card acquiring services (for recurring, online, in person and invoice payments).
- **Global Payments Australia 1 Pty Ltd** provides wholesale payment processing solutions to payment facilitators.

The Software Arm creates software products to support specific industries by providing technology, distribution, and product development.

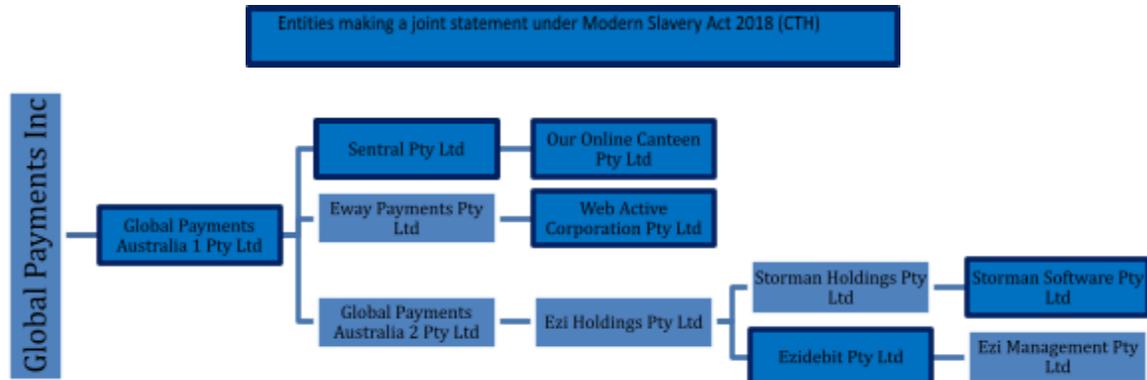
- **Sentral Pty Ltd** provides schools, government, and non-government departments with a comprehensive software platform for the administration, management and reporting of school and student data in Australia.
- **Storman Holdings Pty Ltd** provides self-storage operators with an all-in-one solution for reservations, administration, management, and collection of storer payments.
- **Our Online Canteen Pty Ltd** trading as QuickCliq is a cashless online ordering system for schools to manage canteen orders, uniforms, books, and school fees.

## 2. Our structure, operations and supply chains

### Organisational Structure

As at 31 December 2021, Global Payments Inc controls eleven entities in Australia. While not technically a reporting entity for the purposes of the *Modern Slavery Act (Cth) 2018*, Global Payments Inc is also covered by this statement for the purposes of meeting Modern Slavery

reporting requirements as the Modern Slavery compliance framework is managed at both the enterprise and local level. A simplified structure of Global Payments' Australian reporting entities is provided below.



## Operations

At Global Payments, we are committed to upholding the highest standards of ethical conduct. To do so, all team members must act ethically, with fairness and integrity. To put our mission and values into action, the Employee Code of Conduct and Ethics gives all team members the tools to respond to situations that might violate our standards and company expectations.

As a member of the financial services industry, Global Payments acknowledges its role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. We recognise the growing importance of human rights by our business partners, employees, clients, and customers.

Global Payments has a diverse range of customers including small business merchants, large enterprises, integrated software providers, payment facilitators, independent schools, and government-backed educational institutions.

Our customers interact with us in many different ways – through digital platforms, account managers, technical support teams, sales representatives, and contact centres. Most of our customers have long-term relationships with us, which involve a range of different interactions via multiple channels.

Global Payments software and payments products are developed internally; however, consideration may be given to third-party external capabilities to reduce significant capital outlays or to obtain specific expertise. Therefore, we selectively use local and international specialist providers, which provide access to enterprise solutions and continuous 24-hour coverage to support our operations.

## Supply Chains

While our operations and supply chains are wide ranging, our aim is to ensure staff clearly understand and respect human rights; that staff and our supply chain uphold these rights. We expect our partners and stakeholders to adhere to ethical business conduct consistent with our own, and are committed to working with them to fulfil this common goal.

The policies and frameworks that support GP' day-to-day operations are designed to make sure relevant universally recognised human rights are safeguarded.

## Responsibility

Responsibility for GP's Modern Slavery initiatives are as follows:

- *Vendor Management:* Vendor Management Program Office ("VMPO") is responsible for the on-boarding of new suppliers/vendors across the entire organisation;
- *Local Policies:* Legal and Compliance teams in Australia;
- *Risk assessments, Due diligence and investigations:* Compliance Manager together with the Procurement team, Vendor Data Management, and Vendor Managers;
- *Training:* Legal and Compliance teams together with the People and Culture team; and
- *Oversight:* The Global Payment Australia 1 Pty Ltd Board and Global Payments Australian Senior Leadership Team.

## 3. Vendor management

Effective management of strategic vendors is critical to maintaining Global Payments' operations as well as satisfying regulatory obligations. Global Payments engages thousands of vendors globally for a range of services, including supply by non-trade or unskilled workers to semi-skilled and professionals. An end-to-end vendor management program at the enterprise level addresses vendor risk.

Due diligence and risk assessment on all vendors is mandatory irrespective of the nature of service provided.

Our standard vendor agreement requires each vendor to acknowledge our Code of Conduct and Ethics and to comply with applicable laws and regulations.

The vendor assurance process is conducted by Global Payments' global procurement team. In addition, a comprehensive vendor assurance questionnaire for vendors providing services to Global Payments requires all prospective vendors to respond to direct questions regarding any practices that would identify an increased modern slavery risk.

## 4. Identification of modern slavery risk

The Global Payments VMPO analyses each vendor to determine their inherent and residual risks, focusing on the products and services provided by the vendor. Based on this analysis, vendors are allocated a risk tier.

- Vendors with an initial risk tier of 1 or 2 are vendors deemed to have a significant risk to the company because the vendor offerings are highly integrated or heavily relied upon to maintain operations and an adverse event would likely cause a severe impact to Global Payments. These vendors are subjected to additional due diligence, including the completion of a comprehensive vendor risk assessment questionnaire, contract review, on-site vendor assessments, financial viability review, third party audit/compliance review and sanctions screening.
- Vendors with an initial risk tier of 3 or 4 are considered to be vendors deemed to have limited or minor impact to the company because the vendor offering may be slightly integrated into non-material operations or are not integrated/relied upon to maintain operations. These vendors are subjected to standard due diligence, including the provision of audited financial statements, vendor questionnaire, sanctions screening and vendor performance reviews.

Locally, the Compliance Manager consults with Vendor Managers for each of the vendors included in the annual review. These vendor managers are spread across the entities covered by this Statement and they assist in the review and preparation of this statement.

## 5. Risk assessment

Our 2020 review of Tier 2 vendors indicate that these vendors are predominantly specialist providers of software, hosting, security, and network infrastructure services. Our 2021 review of Tier 3 vendors indicate that these vendors are predominantly specialist providers of SaaS software solutions (55%), technical services consulting (15%), and other services (30%) (i.e. email & fax services, domain registration, market research, network infrastructure), and software licensing). These vendors all require highly skilled staff and pose a low risk of Modern Slavery.

Global Payments' indirect procurement activities serve our internal operations and have a much smaller risk because these represent a small fraction of our overall procurement spend.

Based on our business model, Global Payments believes that our modern slavery risk is limited because we do not have intricate supply chains, multiple contractor or subcontractor levels, or vendor relationships with manufacturing businesses where modern slavery have been found to be an issue.

While recognising that modern slavery risk may exist in non-strategic sourcing categories such as fruit and vegetables, catering, cleaning and promotional materials, we are committed to working with our suppliers to improve compliance and transparency related to modern slavery.

## 6. Prevention and mitigation of risk

Global Payments implemented multiple measures designed to minimise modern slavery and drive social responsibility within our business and supply chain.

### Contractual requirements

Global Payments' standard contract terms and conditions stipulate vendor compliance with all applicable laws and Global Payments' Code of Conduct and Ethics.

### Responsible partners

Global Payments generally does business with large international and national suppliers who have their own environment, social responsibility, governance ("ESG") and corporate sustainability programs.

### Quality assurance programs

Global Payments require vendor managers to maintain a close vendor relationship in order to evaluate and detect emerging risks.

Global Payments' Vendor Management Program Office periodically evaluates Tier 1 and Tier 2 vendors against 5 core principles of regulatory compliance, transparency in sourcing practices, ethical conduct, proactive reporting, and resolution of any contractual breaches or matters of concern.

On a local level, Global Payments procurement, IT and compliance teams perform additional due diligence, risk assessments and investigation of all new and existing suppliers rated as Tier 3 or Tier 4.

### Ongoing monitoring

If any breaches occur or we have reasonable grounds to believe that modern slavery is taking place, we will take the following actions:

- Evaluate the severity of the issue and seek expert guidance
- If severe, determine whether Global Payments can exit the relationship without placing further harm to the victim; or
- If it is not severe or the relationship cannot be exited without causing further harm to the victim, we will work with the vendor to develop an improvement plan and perform regular audits to monitor progress and resolution.

## Code of Conduct and Ethics

Through the Code, our company values and our policies seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations in every aspect of our business. We promote awareness through internal policies, communications and training.

## Reporting concerns

Global Payments' offer multiple reporting channels to our employees, consultants, vendors and business partners, including a web portal and telephone hotline to report concerns anonymously. Our Whistleblower policy prohibits retaliation against anyone who, in good faith, reports any matter relating to modern slavery or who assists in the investigation of a reported concern.

## 7. Future State Initiatives

Global Payments will continue to roll out its Modern Slavery framework with Phase 3 Modern Slavery review – a progressive review of Tier 4 vendors. The outcome of this review will be incorporated in the 2023 Modern Slavery Statement together with any further information relevant to the Tiers 1-3 vendors.

## 8. Modern Slavery Policy Review

Global Payments acknowledges that on-going action is required to mitigate the risk of modern slavery. Global Payments will periodically assess its approach and actions to ensure this is consistent with industry practice.

The Modern Slavery Policy will be administered by the Global Payments Australian Compliance Manager, and is subject to annual review to ensure annual submissions to Australian Border Force remains consistent with legislative requirements, as well as the changing nature of the organisation.

## 9. Board Approval

This Joint Statement was approved by the Board of Global Payments Australia 1 Pty Ltd on behalf of Global Payments Australia 1 Pty Ltd and its wholly owned subsidiaries on 30 June 2022.

This statement is signed by Patrick Mark Reid in his role as the Managing Director of Global Payments Australia 1 Pty Ltd on 30 June 2022.

Global Payments Australia 2022 Modern Slavery Statement

A handwritten signature in black ink, appearing to read 'P. Reid', enclosed within a hand-drawn oval shape.

Patrick Mark Reid  
Managing Director  
Global Payments Australia