



EPAY AUSTRALIA PTY LTD

ABN: 71 093 566 057 ACN: 93566057

Authorised Representative (AR:001246988) of Flexewallet Pty Ltd
(AFSL: 448066)

Modern Slavery and Human Trafficking Statement

Modern Day Slavery and Human Trafficking Statement

Introduction

This statement outlines the actions taken by Epay Australia Pty Ltd (Epay) to identify and mitigate slavery and human trafficking in our business and supply chains. This statement has been produced to comply the requirements set out in the Modern Slavery Act 2018 (Cth) for the period ending 31 December 2020. Our first annual statement is due on 30 June 2021.

Our Business

Epay is a private limited company incorporated in Australia, New South Wales with company registration number: 93566057 with its registered office at 1st Floor, 75 Castlereagh Street, Sydney 2000. Epay is an Authorised Representative (AR:001246988) of Flexewallet Pty Ltd (AFSL: 448066), duly regulated and supervised by the Australian Securities and Investments Commission.

We offer electronic payment, point of sale systems integration, along with marketing and distribution service support. The epay content portfolio includes prepaid mobile top-ups, prepaid debit cards, e-wallets, gift cards, digital music and other content.

Epay is one of many separate legal entities forming part of the Euronet Worldwide group of companies and our ultimate parent company is Euronet Worldwide, Inc. a publicly traded entity on NASDAQ with ticker symbol EEFT.

More information on the Euronet Worldwide group of companies can be found at: <https://ir.euronetworldwide.com/for-investors>. The Euronet Worldwide group has over 7,000 employees worldwide and has its corporate headquarters in Leawood, Kansas, United States of America.

Epay's supply chains are limited as it does not produce, manufacture or retail goods but rather focuses on providing distribution and payment services.

Our Policy and Approach

We are committed to ensuring that there is no modern slavery or human trafficking in our business and/or supply chains, and we have a zero-tolerance approach in this respect.

In addition to the wider requirements on conducting business with integrity and in an ethical manner under the Euronet Worldwide group's Code of Business Conduct and Ethics Charter ("Code"), we expect all those involved in any part of the Epay business, including suppliers, to comply with our approach in order that we can reinforce that no modern slavery practices are taking place in any of our supply chains or in any part of our business.

Epay is supported by in-house legal and compliance functions in order to ensure compliance with all applicable laws and regulations. We have developed due diligence processes, as part of our regulated business lines, in order to on-board relevant third parties.

Steps and Progress

Epay operates under a suite of internal policies that underpin its wider commitment to conduct its business ethically, transparently and to the highest professional standards.

The Code sets out our core values and applies to all employees in the Euronet Worldwide group. It provides guidelines on the required standard of ethical conduct in various situations and specific corporate policies govern the conduct of our business, including but are not limited to the following:

- Recruitment which aims at ensuring employees and/or staff members are adequately screened for eligibility to work purposes and background checks where required depending on the function and location whilst also ensuring all applicable employment laws (including any minimum wage requirements) are satisfied
- Whistleblowing which aims to encourage employees to raise concerns, including about how they are treated or practices within our business or supply chains, without fear of reprisal
- Anti-bribery and corruption which reinforces the standards of behaviour expected of our employees in their dealings with third parties together with our commitment to conducting business with the highest standards of integrity and ethics
- Business wide risk assessments meaning the wider aspects of how Epay conducts its overall business (e.g. with whom, from where and how) are under on-going review
- AML & CTF, measures for which Epay is required to implement in order to assist in combatting money laundering and counter terrorist financing activity

In addition to its internal policies, Epay has adopted a consistent set of base terms and conditions for contracting with customers and suppliers which at a very basic level mandate compliance with all applicable laws and/or regulations failing which Epay has a series of remedial rights including the ability to terminate contractual relationships for material breach.

Our Future Plans

Epay pledges to continue its commitment to combat human trafficking and modern slavery in any form and will work with third parties to ensure that human trafficking and modern slavery does not occur in their business or supply chains. Ongoing measures will include:

- reviewing policies, procedures and terms of business relating to third parties and suppliers;
- training of employees on how to identify, prevent, and report potential signs of human trafficking and modern slavery; and
- reviewing our contractual processes to consider what, if any, amendments are required to reduce risks related to human trafficking and modern slavery.

This statement will be reviewed and updated periodically.

This statement has been endorsed by the Board of Epay Australia Pty Ltd.



Mathew Cory Robertson
Associate General Counsel