

# Stripe Payments Australia Pty. Ltd. Anti-Modern Slavery Statement

Introduction	1
What is modern slavery?	2
Organisational Structure	2
Stripe's risks of modern slavery practices in its operations and supply chains	3
Actions taken by Stripe Australia to assess and address those risks	3
How Stripe Australia assesses effectiveness of actions	4
Any other info relevant	5

## Introduction

Stripe is a global technology company that builds economic infrastructure for the internet. Businesses of every size - from new startups to public companies - use our services to accept payments and manage their businesses online. Our goal is to promote equal economic opportunity and equip entrepreneurs from all over the globe to realize their business ideas.

At Stripe, we strive to always do the right thing in our business operations, complying with all applicable laws and maintaining high ethical standards.

Why do we need to make a statement?

We publish this statement in compliance with the *Modern Slavery Act 2018* (Cth) to show our users how we implement policies, procedures and controls to help prevent modern slavery,



human trafficking, forced labour, and labour rights violations from taking place in our business and supply chains.

This statement applies to Stripe Payments Australia Pty. Ltd., ABN 66 160 180 343 ("Stripe Australia") for the period of 1 January - 31 December 2021.

This Statement was approved on 29 June 2022 by the Board of Stripe Australia.

## What is modern slavery?

Modern slavery encompasses all types of slavery, human trafficking, servitude and forced or compulsory labour across a vast number of industries. Modern slavery may affect individuals that are resident within or outside Australia, and includes:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage,
- Deceptive recruiting practices, and
- Child labour and exploitation (where children are subject to slavery or similar practices, or engaged in hazardous work).

## Organisational Structure

Stripe provides business infrastructure and payment technology that is tailored to the needs of merchants and e-commerce platforms. Stripe simplifies payment processing for businesses of all sizes by reducing many of the complexities that can be a barrier to accepting payments online.

Stripe, Inc. (the ultimate parent company of Stripe Australia) was founded in 2009, and is headquartered in the United States. Stripe offers services in over 40 countries.



Stripe Australia was founded in 2012 as a proprietary company and has a registered office at Level 7, 222 Exhibition St, Melbourne, Victoria. Stripe Australia's principal business is acting as reseller of the Stripe services in Australia; contracting with Australian merchants and platforms for the delivery of the Stripe services.

## Stripe's risks of modern slavery practices in its operations and supply chains

Stripe is committed to acting ethically and with integrity in all of our business relationships. We do not tolerate any form of modern slavery, and have systems and controls to help prevent such activity from taking place in our business or supply chains.

Stripe's supply chains include:

- Hardware and software, including computer equipment, software licences, verification vendors, and cloud-based software;
- Data storage services; and
- Professional services from our advisors including law firms, consulting and accounting firms.

The majority of our suppliers are based in Australia and North America.

As an internet-based payment technology business, with the majority of our suppliers being software and professional service providers, Stripe operates in a sector that is considered relatively low risk for modern slavery and human trafficking.

## Actions taken by Stripe Australia to assess and address those risks

Stripe Australia will not deal with any business whom we know to be involved in modern slavery. We take below actions to assess and address its modern slavery risk.

### **Supplier Due Diligence**

Stripe conducts risk-based due diligence of new suppliers before we work with them and on an ongoing basis throughout Stripe's relationship with the supplier. This due diligence involves reviews by Stripe's security, legal, finance and procurement teams. It includes an



assessment of the supplier's modern slavery risk, based on the supplier's jurisdiction and business line. Once reviewed, our suppliers contractually commit to us to comply with all applicable laws in the performance of their obligations.

If Stripe, through its reviews of suppliers, establishes that modern slavery is taking place in our business or supply chains, we will terminate the relevant relationship, report such activity to law enforcement (where applicable) and cooperate with any resulting investigation.

### **Employee Involvement**

In addition, Stripe's employees are expected to behave in accordance with our Employee Handbook. Ethics, transparency, and integrity are core values that we expect all Stripe employees to exemplify when communicating inside and outside of Stripe. Stripe employees are encouraged to raise concerns of suppliers through Stripe's Speak Up program. Stripe also protects whistleblowers through its Speak Up Policy, which provides a confidential avenue for disclosures to be made anonymously.

### Training

At Stripe, all employees are required to complete annual Financial Crimes training. This training informs all employees about the high-level red flags of financial crimes, and provides clear escalation paths to ensure any suspected financial crimes issues are properly reviewed and investigated.

Stripe will develop a Global Regulatory Compliance Culture training module required for all employees at onboarding and on an annual basis thereafter. This training will increase employee awareness of Stripe's responsibility to assess and address modern slavery risks, and their responsibilities as employees in maintaining compliance.

## **How Stripe Australia assesses effectiveness of actions**

To assess the effectiveness of Stripe's anti-Modern Slavery controls, an annual review will be undertaken to examine:



- the appropriateness and effectiveness of the questions within our procurement and due diligence processes to ensure any potential Modern Slavery risks are identified before onboarding a supplier;
- the completion rate of required training modules;
- the concerns raised by Stripe employees in relation to its suppliers.

## Any other info relevant

Stripe is committed to keeping up-to-date on global legal developments relating to human rights and modern slavery to continue operating responsibly and in compliance with the law. We will continue to monitor how we receive and provide services to ensure that we are effectively combatting the risk of modern slavery in our business.

This statement is made pursuant to section 13 of the Commonwealth Modern Slavery Act of 2018 and constitutes our modern slavery statement for the financial year ending 2021. This statement has been approved by the principal governing body of Stripe Australia, the board of directors, on 29 June 2022.

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