



**EML Group
Modern Slavery
Statement 2022**

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EML Group Modern Slavery Statement 2022

1. Introduction

This Modern Slavery Statement (Statement) is made on behalf of EML Payments Limited (**EML**) and its wholly owned subsidiaries including Prepaid Financial Services (Ireland) Limited (**PFS**) and Sentenial Limited (**Sentenial**) and the subsidiary entities it owns or controls operating in Australia, the United Kingdom, Europe and the United States (**Group**).

This is EML's third Modern Slavery Statement that has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2015 (UK) (**collectively, the Modern Slavery Acts**).

The Statement outlines the actions EML has taken across the Group to identify and address the risks of modern slavery to its business operations and supply chain with respect to the financial year ending 30 June 2022 and was approved by the EML Board on 30 December 2022.

2. About EML

Who we are and what we do

EML Payments is an Australian Stock Exchange (**ASX:EML**) listed payments technology company operating proprietary processing and open banking platforms. The business currently has about 650 employees and operates in Australia, Europe, the United Kingdom and the USA.

Our customers are diverse and include major European banks, governments, retail brands and financial services companies with payment volumes in FY22 at \$80.2 billion.

We offer gift, incentive, disbursement and reloadable cards and newer innovations in payments including open banking and real-time payments. The breadth of EML's offerings and industry sectors is unrivalled in the payments space and we are highly regarded for our tailored, feature-rich, white labelled solutions.

EML currently has over 600 suppliers in the regions we operate in. We seek to do business with suppliers and other third parties that have similar values, ethics and sustainable business practices, including those that relate to human rights and modern slavery.

Further details on our activities, performance, products and services can be found on our website at www.emlpayments.com/company/investor-centre

EML Group Modern Slavery Statement, 2022 continued

EML Employees, Policies and Procedures

The values of compliance, ethics, openness, fairness and impartiality guide our employment practices. We use reputable recruitment partners when sourcing employees and contractors who are required to comply with all applicable legislation when carrying out activities on behalf of EML.

We have in place several policies to help guide our employees, including:

- Code of conduct Policy
- Group Whistleblower Policy
- Diversity and Inclusion Policy
- Anti-Bribery & Corruption Policy
- EML Group Human Rights Policy
- EML Supplier Code of Conduct Policy

In addition, our global onboarding and training for all employees covers obligations under our policies on issues such as health, safety, wellbeing, harassment and bullying, discrimination and privacy.

Our Employee and Supplier Code of Conduct Policy requires that all employees and suppliers comply fully with the spirit of all laws and regulations for the regions in which we operate, and to not knowingly participate in any illegal or unethical activity.

Our policies are made available to all employees and suppliers via our company website and our Group Whistleblower Program and Policy ensures any concerns can be raised safely, quickly and confidentially through various internal or external channels including via our external whistleblower hotline operated by Your Call.

3. Risk of modern slavery practices in our operations and supply chain

EML acknowledges the risks of modern slavery globally and committed to working to prevent modern slavery and human trafficking in our business and supply chain.

We continue to assess our business model and geographical footprint. Given the level of control we have over our operations, managed through our frameworks and policies, and the location of our offices, we believe that our material exposure to modern slavery is limited to our supply chain.

Within our supply chain we believe our risk is further limited to a narrow set of industries ranging from technology companies providing hardware, businesses that provide equipment and services for our employees including office furniture, office supplies, promotional materials, food and beverage and maintenance and cleaning.

We have also analysed country risk associated with our suppliers and main business locations. Based on the information sourced via the Global Slavery Index*, we currently do not believe we have any material exposure to suppliers who are based in countries that have a high risk of modern slavery.

Notwithstanding, EML acknowledges that it is vital that we continually review our supply chain and operations to reduce the possibility that any of our business activities contribute to, or facilitate, any forms of modern slavery.

* Walk Free Foundation, Global Slavery Index - 2018

EML Group Modern Slavery Statement, 2022 continued

We are pleased to confirm that we have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers. If we suspect modern slavery, we will ensure that appropriate action is taken including:

- Investigating the alleged conduct, either internally or externally via an independent third party
- Engaging with suppliers to express our concerns and work with them to address and remediate the situation.

If a supplier is unwilling or unable to remediate, we would take the necessary action, including:

- Abstaining from entering a contractual arrangement or terminating the contract; and/or
- Reporting the suspected conduct to the relevant authorities.

4. Key initiatives/actions in FY22

During the reporting period we continued to implement and ensure compliance with our modern slavery commitments, including completion of the following key steps:

Risk assessment of new and existing suppliers

In FY22 we continued to develop the risk assessment methodology introduced in FY20 when completing EML's first Modern Slavery Statement. The assessment continues to review risk factors including industry sector, geographic location and any Human Rights / Modern Slavery reporting the individual supplier produced in order to determine if supplier operated in a high risk location, the type of entity providing the goods or services, and what level of modern slavery reporting the supplier made (if any).

The FY22 review concluded that EML had business dealings with over 600 suppliers with whom it directly procures goods and services through. These suppliers are located in the countries in which we operate and do not pose an elevated concern in respect to modern slavery risk.

Regular review of Corporate Policies

The Board regularly review Corporate Governance policies including EML's Group Human Rights Policy to support the Company's Code of Conduct Policy. The Group Human Rights Policy was reviewed by the Board in August 2022.

Supplier Code of Conduct Policy / Supplier Questionnaires

In October 2021 the Board approved EML's Supplier Code of Conduct setting out the standards and the expectations of our suppliers in relation to ethics, business conduct, compliance with the law, Modern Slavery, Human Rights and Labour Standards.

The Company distributed its Supplier Code of Conduct to all existing suppliers and sought confirmation of compliance from suppliers to ensure they are aligned to EML's values and expectations. EML will continue to include the Supplier Code of Conduct and/or the Supplier questionnaire in our onboarding procedures for new suppliers.

5. Measuring effectiveness

Following the distribution of the Supplier Code of Conduct during FY22, over 200 signed attestation / confirmations of compliance with EML's Supplier Code of Conduct were received.

100% of individual questionnaires distributed to suppliers operating within a sector deemed "high risk" were returned and there was no identification of modern slavery either within EML's operations or supply chain during the reporting period and no disclosures regarding Modern Slavery made to EML's Whistleblower hotline.

EML Group Modern Slavery Statement, 2022 continued

6. Training

We understand that one of the most effective tools for mitigating EML's modern slavery risks is to raise awareness of through education.

Compliance training covering obligations under our policies on issues such discrimination, bullying and harassment, human rights, antibribery and corruption is becoming mandatory through EML's Learning Management System (LMS) with training monitored and reported through our People team. Employees who fail to complete mandatory training without a valid reason may face disciplinary action.

7. Looking ahead

We understand our key modern slavery risks, have put policies and processes in place to help us address them and will regularly assess the effectiveness of our actions for continual improvement.

In the financial year ending 30 June 2023 we aim to:

- Continue to include EML's Supplier Code of Conduct in our onboarding procedure for new suppliers;
- Undertake reviews of supplier documentation and perform assessments of supplier practices as part of EML's continuous improvement plan to monitor our suppliers compliance with the law;
- Continue to distribute questionnaires and obtain attestations for suppliers identified as "operating within a "high risk" sector;
- Continue to make sure that our policies and recruitment processes are appropriate to protect against modern slavery and human trafficking; and
- Continue to develop and deliver modern slavery awareness training through EML's induction program and LMS.

We will continue to reassess the risks in our operations and our supply chain to make sure the steps we take to protect against modern slavery and human trafficking are relevant and effective.

8. Impact of COVID-19 to our supply chain

EML are pleased to report that it has not identified an increased risk of modern slavery to workers in its operations or supply chain for the period 1 July 2021 to 30 June 2022 as a result of the ongoing impacts of COVID-19 and is committed to maintaining supplier relationships and fostering open communication with suppliers about COVID-19 associated risks.

9. Consultation and Board Approval

Our Modern Slavery Statement was prepared by the Group Head of Corporate Governance (with input from our Risk & Compliance, and Finance teams) and reviewed by our Audit and Risk Committee (ARC) Chairman. The FY22 Modern Slavery Statement was circulated to the directors of EML for comment and review prior to its formal approval by the Board on 30 December 2022.

We consulted the relevant companies we own or control in the development of this Statement.



Emma Shand

Managing Director and Group Chief Executive Officer

30 December 2022