

Modern Slavery Statement 2025

This Modern Slavery Statement (**Statement**) is made on behalf of Tyro Payments Limited (ABN 49 103 575 042) (**Tyro**), in accordance with the reporting requirements of the *Modern Slavery Act 2018* (Cth). The Statement is in respect of the 12-month period ending 30 June 2025.

This statement sets out the actions taken by Tyro to identify and reduce the risks of modern slavery and human trafficking in our business and supply chains. It also illustrates the actions we are taking to effectively manage the risk to people and to our business.

This Statement was approved by the Board of Directors of Tyro and all controlled entities on 24 October 2025.



Jon Davey CEO | Managing Director

About Tyro

In 2003, Tyro set out to make payments the easiest part of doing business. Today, we're still into business big time, powering more than 73,000 merchants across Australia with instore, online, and on-the-go payment solutions. Working with more than 700 partners, we create seamless payment experiences for hospitality, retail, services, and health providers, with integrated banking and lending solutions designed to help unlock the potential of every business.

Our team, structure and service providers

Our team

Tyro has 564 employees with teams located in Sydney, Melbourne, Brisbane, and Bendigo.

Our people are at the heart of our business at Tyro. We are guided by our core values, which define how we engage with our customers and collaborate with each other to achieve our mission and deliver for our customers.



Our structure

Tyro is a public company and is listed on the Australian Securities Exchange (ASX). Further details on Tyro, our operations, products, services, financial position, and performance are in Tyro’s financial reports, available at <https://investors.tyro.com>.

During the reporting period, Tyro maintained 100% control of Tyro Health Pty Ltd (**Tyro Health**), whose principal place of business is in Australia. Tyro Health operates in accordance with all of Tyro’s policies and procedures including risk, procurement, legal, compliance and human resources. Our modern slavery risk management processes and controls are embedded at the group level. Tyro Health was consulted as part of the preparation and development of this Statement.

Our service providers

Our supply chain relates to the provision of services and products required for day-to-day operations. Covering areas including:

- **Information and Communications Technology:** includes IT applications, hardware, and software (including payment terminal (hardware) supply), telecommunications and network services, infrastructure and data centres, hosting and cloud platform services, computer systems and peripheral devices.
- **Corporate services:** includes recruitment, contractors, training, events, and conferences.
- **Marketing:** includes brand, market research, agency spend, merchandise, advertising and media spend.
- **Property and facilities management** includes asset services, cleaning, utilities, waste management, construction management, catering, insurance, and rent.
- **Professional services:** includes audit, consulting, and legal services.

Although we expect each service provider to define their own sustainability measures, including their approach to modern slavery, we evaluate the modern slavery risks associated with a service provider as part of our centralised risk assessment processes. In FY25, all new service providers were assessed for modern slavery risk.

Risks of modern slavery

We recognise that modern slavery is a complex global issue and are committed to addressing it through our legal, policy, operational, and risk management frameworks.

Modern slavery risks in our operations

Our business focuses on providing payments and banking products and services to Australian business customers. Employees are based in Australia with a small number of Technology contractors in China and India. The workforce is made up mostly of skilled specialists and we have strong hiring and procurement policies in place to ensure compliance with all relevant local, national, and international laws and regulations.

Grievance mechanisms are in place to provide employees with an ability to raise concerns anonymously via our whistleblower program. The availability of the service is made known to staff within training material and is available to all current and former employees, contractors, and temporary staff.

On the basis of workforce composition, governance structures and control frameworks, the risk of modern slavery within Tyro's direct operations is assessed as low.

Modern slavery risks in our supply chain

There is risk that Tyro could cause or contribute to modern slavery if present in our supply chain. We acknowledge that certain sectors, products, and services can carry elevated risks of modern slavery, particularly when sourced from regions with known vulnerabilities due to geographic, socio-economic, or business model factors. For Tyro, this risk is most pertinent to the manufacturing and sourcing of components for our payment terminals from parts of Asia.

To meet our obligations under the Modern Slavery Act and address modern slavery risks within our supply chains, controls are embedded as part of Tyro's procurement process. This includes as part of the supplier selection and onboarding process as well as ongoing management and monitoring.

Factors we consider include:

- high-risk sectors e.g. manufacturing, raw materials, and electronics;
- countries that are at a higher risk for modern slavery;
- unskilled or low skilled workforce example: labouring, cleaning services;
- labour force used e.g. temporary workers; and
- vulnerable groups e.g. migrant workers, children, and women.

Modern slavery initiatives

Training

All employees responsible for managing service provider relationships receive training to ensure they understand the procurement process, including the requirement to assess modern slavery risks.

During the reporting period, Tyro introduced its *Modern Slavery Assessment, Monitoring, and Reporting Procedure*. This procedure sets out Tyro's approach to managing modern slavery risks, providing guidance for contract owners on how to identify signs of modern slavery in our operations and supply chains, and how to raise any concerns.

Service provider risk assessment and due diligence

Aligned with recommended best practice, we assess all service providers at the time of onboarding to determine the level of risk the relationship is subject to, and the required level of due diligence based on the

following criteria: country of operations, industry category and total spend. Based on the outcome of this initial assessment, certain service providers may be subject to enhanced due diligence, which could include desktop-based surveys and/or interviews to better understand their operations, workforce practices, and supply chain structures.

To strengthen this framework further, Tyro introduced enhanced due diligence requirements for service providers deemed material to our operations under APRA Standard - CPS 230 Operational Risk Management to ensure that we assess the financial and non-financial risks from reliance on the service provider, including modern slavery risk.

While we focus on our direct service providers, we also acknowledge potential risks within their supply chains (fourth parties). Where appropriate, we require certain service providers to formally acknowledge and adhere to our Service Provider Code of Conduct, which sets out the minimum standards that we expect of our service providers and their own supply chains in areas such as modern slavery, labour and human rights, bribery and corruption.

These activities are supported by Contract Owners, who play a critical role across the procurement and service provider management lifecycle. They are responsible for maintaining the business relationship, ensuring compliance with risk and due diligence processes, and escalating any concerns that may arise in relation to service provider conduct.

Case Study: Service Provider Onboarding and Due Diligence

In the reporting period, Tyro onboarded a service provider subject to the enhanced assessment criteria under the Service Provider Management Policy. The evaluation focused on the service provider's overall risk management framework, with attention to how they address modern slavery risks within their operations and supply chain.

Whilst the service provider primarily operates in countries considered low risk for modern slavery, some activities involve sourcing from manufacturing and labour-intensive environments, which pose higher risks. To address these risks, we conducted a thorough review of the service providers' modern slavery statements, relevant policies, and engaged with key stakeholders involved in their operations. This enabled us to examine their reporting structures, operational practices, supply chain oversight, and procedures for assessing modern slavery risk.

Based on these findings, Tyro concluded that the service provider maintains effective risk management practices and a robust modern slavery framework to adequately identify and mitigate associated risks.

Remediation Processes

Any modern slavery related concerns can be raised through our Whistleblower and Complaints Handling processes, or directly to our Risk or Legal teams. Both the Whistleblower Policy and Complaint Handling process are made available to employees via our internal intranet system and can be accessed by third parties through our website.

If a modern slavery concern is raised, the Risk team conducts any required investigation in accordance with regulatory requirements, policies, and procedures.

If the service provider is unwilling or unable to remediate, we would take appropriate action, including considering:

- abstaining from entering a contractual arrangement or terminating the contract; and/or

- reporting the suspected conduct to the relevant authorities.

Tyro has not become aware of any instances of modern slavery in our operations or supply chain. As such, we have not been required to remediate any situations where we may cause or contribute to modern slavery.

Policies

Our work on modern slavery is supported by policies that include:

- Service Provider Management Policy
- Service Provider Code of Conduct
- Whistleblower Policy
- Anti-Bribery and Corruption Policy
- Workplace Health and Safety

Service Provider Management Policy

Tyro's Service Provider Management Policy sets out the expectations for onboarding and managing service providers. The Policy is supported by our *Modern Slavery Assessment, Monitoring and Reporting Procedure*, which sets out the due diligence and monitoring activities undertaken to detect, prevent, and respond to modern slavery risks across our operations and supply chains.

Service Provider Code of Conduct

Tyro's Service Provider Code of Conduct sets expectations for service provider conduct and supports our commitment to identify and mitigate the risk of modern slavery.

Anti-Bribery and Corruption Policy

The Tyro Anti-Bribery and Corruption Policy outlines our approach to managing bribery and corruption risk and helps to prevent conduct that involves or could be perceived as involving acts of corruption.

Tyro also supports a culture of transparency and has clear whistle-blowing procedures should any employees suspect that bribery or corruption may have taken place.

Whistleblower Policy

Tyro is committed to a whistleblowing program that provides an environment that allows for the safe reporting of any conduct that is contrary to Tyro's values and policies including its Code of Conduct.

Tyro encourages all employees to speak up if they see behaviour that does not align with Tyro's values. We proudly display our values at www.tyro.com/about-tyro/

Workplace Health and Safety

As an employer, Tyro is responsible for the safety of its employees at work. We emphasise that staff also have responsibilities in relation to ensuring their own safety and that of others in the workplace.

Tyro monitors and reviews the effectiveness of relevant internal policies and how these have been implemented across our business areas.

Assessment of effectiveness

Tyro continues to build capability in identifying, assessing, and mitigating modern slavery risks. We are committed to regularly reviewing the effectiveness of our actions and processes to ensure they are driving meaningful outcomes.

Current effectiveness measures include:

- the implementation of the Service Provider Management Policy, which has enhanced procurement practices and aligned them with APRA standard CPS 230 Operational Risk Management;
- the introduction of the *Modern Slavery Assessment, Monitoring and Reporting Procedure*, which outlines the due diligence and monitoring activities undertaken to detect, prevent, and respond to modern slavery risks across our operations and supply chains;
- ensuring that all service providers have undergone a modern slavery risk review; and
- the investigation and appropriate management of all reported or suspected modern slavery incidents.

Conclusion

Tyro recognises and understands the importance of the *Modern Slavery Act 2018* (Cth) and is committed to continually improving our approach to identify, assess, and manage modern slavery risk in our operations and supply chain.

Tyro's Modern Slavery Statement demonstrates our commitment to living by our values. We also recognise that our work to identify and manage modern slavery risks will continue to be enhanced and adapted in an ever-changing environment.

Looking ahead, we are focused on the following priorities for the next reporting period, including continuing to:

- monitor and manage adoption of our new *Service Provider Management Policy* and *Modern Slavery Assessment, Monitoring, and Reporting Procedure*.
- review and enhance Modern Slavery training to help ensure continued awareness of risks among contract owners.
- improve reporting and processes to better assess the effectiveness of risk mitigation strategies.

Enquiries

All enquiries or feedback on this Statement and Tyro's Modern Slavery Framework should be directed to Tyro's Compliance team at compliance-team@tyro.com.

Previous statements

[2021](#), [2022](#), [2023](#), 2024

Jonathan Davey

CEO & Managing Director