

1 May 2026

Cambridge Mercantile (Australia) Pty. Ltd. (ABN 85 126 642 448)
Modern Slavery Statement
For the Financial Year Ended 31 December 2024

Message from Senior Management

Cambridge Mercantile (Australia) Pty. Ltd. ("**Cambridge Australia**") is committed to conducting business ethically, responsibly, and transparently. We recognise that modern slavery and human trafficking are serious human rights violations and are dedicated to ensuring that neither occurs within our operations or supply chains.

This statement is prepared in accordance with section 16 of the Modern Slavery Act 2018 (Cth) ("MSA 2018") and outlines the steps Cambridge Australia has taken to assess and address risks of modern slavery in our business during the financial year ended 31 December 2024.

As part of the Corpay Cross-Border group, we align with the global group's commitment to maintaining integrity and respect for human rights throughout all business operations.

1. Structure, Operations and Supply Chains

Cambridge Australia is a proprietary limited company incorporated in Australia (ABN 85 126 642 448) with offices in Sydney, New South Wales. Cambridge Australia does not own or control any other operating entities except for Corpay (NZ) Limited. Cambridge Australia consulted with Corpay (NZ) Limited, an entity it controls, in the preparation of this statement. This consultation included the sharing of information on supplier risk profiles, due diligence processes, and alignment of modern slavery risk management frameworks.

We are part of the Corpay Cross-Border group of companies, with global headquarters in Toronto, Canada, and affiliated offices in Australia, India, Ireland, Italy, Jersey, Malta, New Zealand, Singapore, Spain, Sweden, the United Kingdom, and the United States. The ultimate parent company is **Corpay, Inc. (NYSE: CPAY)**, headquartered in the United States.

Cambridge Australia specialises in providing foreign exchange and global payment solutions to business clients. As a financial services provider with intangible service offerings and limited physical supply chains, our overall risk exposure is assessed as relatively low compared to higher-risk industries.

Our primary suppliers include:

- Reputable banking and financial partners;

- Technology vendors and compliance software providers; and
- Professional services firms (legal, accounting, and consulting).

Most suppliers are located in Australia, New Zealand, North America, and the EU, with some technology vendors operating from India.

2. Policy on Modern Slavery and Human Trafficking

We maintain a **zero-tolerance approach** to modern slavery in any form. Key policies supporting this commitment include:

- **Whistleblower Policy:** Encourages reporting of suspected misconduct or exploitation.
- **Supplier Code of Conduct:** Requires compliance with human rights, labour, and anti-slavery laws.
- **Risk Appetite Statement:** Prohibits engagement with clients or suppliers connected to exploitation or trafficking.

We regularly review these policies to ensure they remain effective and aligned with legal and ethical standards.

3. Due Diligence and Risk Management Processes

Our due diligence framework includes:

- **Employee checks:** Verification of right-to-work, identity, and background to ensure compliance with Australian employment laws (*Fair Work Act 2009 (Cth)*).
- **Supplier screening:** Assessing supplier jurisdictions, ownership structures, and ethical track records.
- **Ongoing monitoring:** Review and renewal of supplier due diligence to ensure ongoing compliance.

As a regulated financial institution, Cambridge Australia also complies with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*, which supports broader risk mitigation against exploitation in financial channels.

Remediation: Where Cambridge Australia identifies or is made aware of actual or potential modern slavery practices, we will investigate the matter in accordance with internal compliance procedures. Where appropriate, this may include engaging with the relevant supplier or counterparty to implement corrective actions, suspending or terminating the relationship, and,

where applicable, supporting access to grievance mechanisms. Reports can be made through our Whistleblower Policy, and all reports are assessed by the Compliance function.

4. Identified Risks and Mitigation

While the overall risk remains low, potential exposure may exist in:

- Technology or IT service providers based offshore (these jurisdictions can present elevated supply-chain labour risks through outsourced labour models and/or limited regulatory oversight);
- Professional service firms utilising third-party labour; and
- Contractors and recruitment agencies.

To address these, Cambridge Australia:

- Conducts enhanced due diligence for higher-risk suppliers;
 - Requires contractual compliance with applicable anti-slavery and labour laws for relevant suppliers; and
 - Maintains internal escalation protocols for any identified risks.
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5. Measuring Effectiveness

Cambridge Australia monitors its performance through measurable indicators:

- No identified or reported incidents of modern slavery in FY2024;
- 100% staff completion of annual modern slavery training;
- Annual review of policies and supplier risk assessments;
- Confirmation of compliance from applicable suppliers.

Effectiveness is assessed annually through a review by the Compliance function, which analyses training completion, supplier risk assessments, and any reported incidents to determine whether controls remain adequate.

6. Training and Awareness

All employees complete mandatory annual training covering modern slavery and ethical business practices. Additional, role-specific training is provided to employees in procurement, legal, and compliance functions.

7. Continuous Improvement

We are committed to improving our modern slavery risk management practices through:

- Strengthening supplier engagement and audit processes;
- Collaborating with the Corpay global compliance network; and
- Aligning our reporting framework with evolving Australian and international best practices.

This statement was prepared in consultation with relevant Corpay Cross-Border group entities and approved by the Board of Cambridge Mercantile (Australia) Pty. Ltd.

8. Contact Information

For any questions regarding this statement, please contact:

Legal & Compliance Department

Cambridge Mercantile (Australia) Pty. Ltd.

Email: legal@cambridgefx.com

Website: <https://www.corpay.com/en-AU/cross-border>

This statement was approved by the Board of Directors of Cambridge Mercantile (Australia) Pty. Ltd. on 1 May 2026 in accordance with section 13 of the *Modern Slavery Act 2018 (Cth)*.

Signed on behalf of the Board:

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Mark Frey, Director

Cambridge Mercantile (Australia) Pty. Ltd.

Date: 1 May 2026
