

WORLDLINE MODERN SLAVERY STATEMENT 2021

1. Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Australia). It sets out the steps that Worldline SA and its subsidiaries (collectively “Worldline”) have taken between 1st January 2021 and 31st December 2021 to ensure that slavery and human trafficking do not exist in their supply chains or in any parts of their businesses.

Worldline IT Services UK Limited, Worldline S.A./N.V, equensWorldline SE, Worldline Sweden AB, Ingenico (UK) Limited and Worldline Retail Enterprise (UK) Limited fall within the scope of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 (the Act). The main Worldline trading entity in Australia, Ingenico International (Pacific) Pty Limited (“Ingenico AUS”) falls within the scope of the Modern Slavery Act 2018 (Australia).

We recognise that slavery in all of its forms, including servitude, forced or compulsory labour and human trafficking (“**Modern Slavery**”) continues to be a serious issue and we are fully supportive of efforts to eradicate these abhorrent crimes. This statement sets out the steps that we have taken towards eliminating the risk of Modern Slavery taking place in our organisation and in our supply chain.

2. Worldline Group structure

Powered by approximately 20,000 employees in more than 50 countries, Worldline operates across the full payment services value chain, providing an extensive range of merchant acquiring, payment processing and business solutions and services to financial institutions, merchants, corporations and government agencies.

A significant element of Worldline’s supply chain relates to the manufacturing of payment terminals, which is fully outsourced. This process is managed by Worldline’s French and Chinese entities, and the payment terminals are then distributed to regional entities. The assembly of the payment terminals is carried out by approved subcontractors who have been thoroughly evaluated and are regularly audited. Upstream from this assembly chain, Worldline works with a community of suppliers to produce its various components. These product manufacturing and assembly activities are predominantly carried out in Hong Kong, China, Taiwan, Vietnam, Thailand, Malaysia and Brazil. In 2021, Worldline’s product manufacturing programs have been consolidated in the TSS division, leading to common practices in terms of the supply chain.

Conducting business in an ethical and sustainable way is part of Worldline’s culture and strategy in all its spheres of influence, it is a “must have” that Worldline has integrated into the company’s thinking and processes. We truly believe that our responsibilities go beyond our own company, and we strive to embed our values in our relations with all our employees, customers, partners and across our supply chain.

Worldline operates a Corporate Social Responsibility (“CSR”) programme, which also focuses on labour practices, with its main objectives being the management of the company’s operations in a responsible and ethical manner and which integrates social and environmental factors in the supply chain. In this respect we address human rights abuses and issues of Modern Slavery. Since its first Modern Slavery statement in 2017, Worldline has relied on its CSR programme to follow and improve its policies and due diligence practices, as described in this statement. In 2021, Worldline renewed its CSR programme with an upgraded 5-year plan - TRUST 2025. This ambitious CSR programme builds on the achievements of TRUST 2020 and commits Worldline to the same high standards, with new, clear goals¹.

In this regard, two specific Key Performance Indicators (KPIs) have been set up:

- 100% of suppliers with an EcoVadis score below 45 having an action plan to solve critical findings identified;
- strategic suppliers representing 90% of total supplier expenses assessed by EcoVadis.

3. Global Compact

Worldline joined the UN Global Compact in 2016 and since 2020 has been represented by its CEO, Mr. Gilles Grapinet, on the Board of Directors of Global Compact France. Being a member of the Board of Directors of Global Compact France gives Worldline a real opportunity to join forces with a major institutional player in the field of sustainable development. The UN Global Compact provides a universal standard for corporate responsibility and provides a framework which guides all businesses regardless of size, complexity or location in the principles that they need to adhere to in order to reduce human rights and labour abuses. Principle 5 of the UN Global Compact specifically addresses Modern Slavery and advocates “the effective abolition of child labour”. In this regard, the Company is also committed to contributing to the United Nations Sustainable Development Goals (SDGs) which also enshrine the Global Compact principles.

4. Policies and procedures

1. Code of Ethics

Worldline’s Code of Ethics has been part of every employee's contract since 2011. It was last reviewed, updated and approved by the Worldline CEO in 2021. The Code of Ethics has been made available in 12 languages.

Suppliers, partners and third parties who assist Worldline in its business activities must also commit to respecting the principles of the Code. Additionally, all Worldline employees must complete a mandatory e-learning module on the Code of Ethics, so that all employees are familiar with this key document.

Within the Code of Ethics, Worldline commits to ensuring compliance with international labour regulations and to be a responsible company in dealing with all its partners, guaranteeing strict compliance with laws and regulations.

¹ TRUST 2025 is the subject of a set of 15 new objectives to be achieved within the next 5 years in the areas of data protection and security, social innovation, well-being at work, diversity & inclusion, skills & careers development, human rights, ethics, sustainable procurement, as well as the fight against climate change through the reduction of GHG emissions and the protection of biodiversity, as well as the development of local communities.

The Code emphasises the ethical standards and values Worldline's employees and partners must abide by and includes a specific commitment relating to Modern Slavery:

“Following the United Nations Global Compact principles on human rights, labour and environment, we adhere to the elimination of all forms of exploitative and compulsory labour and the effective abolition of child labour, upholding the freedom of association and the effective recognition of the right to collective bargaining as well as supporting and respecting the protection of internationally proclaimed human rights.”

2. Whistleblowing Policy

The Code of Ethics includes the right of any Worldline employee or stakeholder to disclose behaviours or actions deemed inconsistent with the values and principles of the Code of Ethics.

Worldline Compliance Alerts Policy gives an overview on how Worldline acts on reports of compliance breaches including the protection of the person raising the alert. In 2021, the policy was reviewed and updated in order to align with the EU Whistleblowing Directive.

To support the implementation of the policy, a Compliance Alert System has been established in line with the requirements of data protection authorities by which employees may alert the company to any non-compliance with the Code of Ethics and any other issues of non-compliance via a dedicated email address and an anonymous online reporting line. Line managers, the Global Head of Compliance and Human Resources are also points of contact for any employee wishing to raise an alert. Through the Compliance and Data protection committee, the CEO has visibility of these alerts.

The Compliance Alerts Policy ensures that the rights of employees, and the sender or subject of the alert, are protected during the whistleblowing process. Accordingly, a person who raises the alert is assured of complete confidentiality in relation to the alert. The policy also states that the reporting employee shall not be subjected to any penalty or retaliatory measure, provided that the reporting employee acted in good faith and without the intention to cause harm, even if the events relating to the alert prove inaccurate or no action is subsequently taken. It now also includes the formalisation of the alerts handling processes and confirms the right of individuals to raise concerns anonymously in line for instance with the EU Whistleblowing Directive.

The Compliance Alert System is also shared with Worldline suppliers and third parties who are encouraged to report any concerns.

3. Human Rights Policy

Worldline published and implemented a Human Rights Policy in September 2021, reaffirming our commitment to respect and implement both local and international laws and principles of human rights. The applicable legislation includes, but is not limited to, the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; the Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation; and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. Worldline is also committed to comply with local conventions and legislations devoted to Human Rights. If these local conventions and/or legislation are more stringent, they shall prevail.

The policy covers both employment practices and social impacts.

Regarding the employment practices, several pillars have been identified:

- Prevention of child labour/minimum age worker

Worldline ensures that no child labour is used at any of Worldline's facilities. Worldline entities must comply with the minimum age defined in the legislation of each country.

Suppliers are evaluated on their CSR performance to ensure that they respect these commitments and in some cases are subject to onsite audits to verify compliance.

- Forced/bonded/compulsory labour

Worldline ensures that none of its employees may be compelled to work through force or intimidation of any form (this can include bonded labour, debt bondage, forced prison labour, slavery, servitude, or human trafficking), or as a means of political coercion or as punishment for holding or expressing political views.

Worldline ensures that it does not use, contract, or benefit (directly or indirectly) from the use of forced labour. Through the whistleblowing alert system, it is possible for any employee to report such behaviour.

Additionally, Worldline ensures that its third parties must not use forced labour as defined above. This is ensured through the Group Business Partner Management Policy.

The Human Rights Policy also addresses freedom of association / collective bargaining and the right to strike, health and safety, working conditions and harsh or degrading treatment / harassment. Social impact topics are also covered, including supply chain management and anti-corruption / anti-bribery.

4. Worldline Group Business Partner Management Policy

The purpose of the Worldline Group Business Partner Management Policy is to establish a framework for an effective Business Partner management programme and to ensure that Worldline is only dealing with business partners of a certain ethical standard. The Policy documents the fundamental principles and mandatory rules for managing Business Partners from selection through to termination of the business relationship. The policy also ensures that Worldline is dealing with Business Partners who follow high ethical standards as per the applicable rules and legislations.

The Policy considers specific legal and regulatory requirements for sound management of business partners. More specifically, Worldline complies with applicable laws, regulations and international standards including but not limited to:

- Sapin II
- Loi sur le devoir de vigilance 2017²
- EBA Guidelines on Outsourced Arrangements
- UK Modern Slavery Act 2015

² Under the French Duty of care legislation, companies that are in the scope of the law must establish and effectively implement a vigilance plan. "The plan should allow for risk identification and the prevention of severe violations of Human rights and harm to the environment resulting from three kind of activities: (i) the activities of the company itself, (ii) the activities of companies under its control and (iii) the activities of the subcontractors or suppliers with whom it maintains an established commercial relationship".

- Australia Modern Slavery Act 2018
- Foreign Corrupt Practices Act of 1977 (FCPA)
- UK Bribery Act 2010
- Transparency in Supply Chains Act 2012

5. Supply chain standards

1. Business Partner's Commitment to integrity charter

Worldline shares its values and commitments with its suppliers and partners through a bespoke document, the 'Business Partner's Commitment to Integrity Charter', which forms part of and is appended to all supplier contracts and is available on Worldline's website. This charter summarises the principles with which all Worldline partners and suppliers should comply, and the actions that our suppliers are required to take, in order to be able to work with Worldline. It also encourages suppliers to follow the principles of the United Nations Global Compact in the areas of human rights, labour, environmental preservation and anti-corruption.

The charter explicitly refers to Modern Slavery:

"Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of individuals' liberty in order to exploit them for personal or commercial gain.

Worldline expects its Business Partners to act ethically and with integrity in all their business dealings and relationships and to implement and enforce effective controls to ensure modern slavery is not practiced in their businesses and supply chains."

2. Responsible Sourcing of Minerals

We have assessed that there is a risk that some of the hardware suppliers (for terminals and data centre components for instance) could source minerals for components manufactured from conflict regions. Worldline is committed to ensuring that the smelters from which our suppliers buy the minerals are not likely to source from mines in conflict regions (in compliance with the Responsible Minerals Initiative – RMI). In this respect, the Company supports the efforts of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Worldline also commits to the Responsible Minerals Initiative and, to this end, an open letter addressed to Worldline suppliers has been signed by Worldline SA's Corporate Social Responsibility Officer and is published on the Worldline website in 2020. The letter requires suppliers to ensure that their supply chain is conflict-free. In addition, Worldline requests all its suppliers to report on the origin of their conflict minerals.

Worldline's CSR programme includes a KPI, demonstrating the percentage of concerned suppliers (sourcing minerals) that report on the origin of the source of their conflict minerals (3TG). In 2021 it concerns 97% of the suppliers. If the suppliers are sourcing from a non-compliant smelter (RMI classification), they are required to set up an action plan to correct this.

3. Corporate Social Responsibility clause

In 2021, Worldline introduced a Procurement Contract Policy that provides clauses to be used by buyers during contract negotiation covering CSR, security, audit rights, data protection, and EBA guidelines. The CSR clause, to be systematically added in all contracts, compels the partner to align with the Business partner's commitment to integrity charter and Worldline's Code of Ethics, and may require a minimum of extra-financial ratings to be provided within the first year of contract with Worldline. The clause also stipulates that the Company reserves the right to conduct a CSR-related audit at its suppliers. Worldline General Purchasing Terms and Conditions also includes this same CSR clause.

For the particular case of components suppliers, CSR topics are already included within the scope of audits conducted by the Worldline Quality teams.

6. Due Diligence and Audits in our Supply Chain

Risk classification. In order to manage the supplier database more efficiently and enable us to take appropriate actions, we assess our tier 1 suppliers and classify them into three different operational categories:

- Strategic: long-term supplier matching at least one of the following criteria: high spend, non-substitutability, specific technology involved, specific risks related to services.
- Monitored: supplier that is not strategic but can represent a risk for Worldline (supplier entity risk related to compliance/CSR or engagement risk related to security, etc.).
- Standard: other suppliers not falling within the scope of other categories.

This classification is set by the buyer responsible for the supplier during the on-boarding and is reviewed annually. It enables the procurement team to follow different steps depending on the status of the supplier. It is the basis of the sustainable procurement initiative which targets primarily strategic and critical suppliers for Worldline.

Supply chain due diligence describes the efforts taken to investigate a potential supplier and regularly assess existing suppliers. Its objective is to discover any corruption / ethical / human rights abuse / extra-financial risks associated with the potential or existing supplier in order to ensure integrity within the supply chain.

Due diligence on suppliers is initiated from the on-boarding phase with a thorough screening (financial and non-financial) and checking that assesses supplier risks. Follow-ups are organised according to the level of risk identified.

EcoVadis assessment is triggered for strategic suppliers in order to more closely monitor their CSR performance.

For more information regarding the supplier risk assessment and due diligence, please refer to Worldline Universal Registration Document, section D.4.6

In order to assess the CSR practices and mitigate the risks of our key suppliers (Strategic and Monitored), we have implemented our own EcoVadis supply chain platform, inviting our key suppliers (tier 1) to be assessed by EcoVadis and share their scorecard in our platform.

In 2021, 84 different suppliers (at parent company level) were assessed by EcoVadis in the Worldline platform, representing 74% of the Strategic suppliers and 86% of the total spending of these Strategic suppliers. The average score of Worldline suppliers assessed was 61.7/100, above the average score of all companies assessed by EcoVadis globally. 100% of Worldline's suppliers evaluated by EcoVadis with a score below 45 (7 suppliers) had an action plan to solve critical findings identified.

7. Training and Awareness

As ethics is one of the foundations of its business model, Worldline has established a mandatory annual training programme for all Worldline employees, addressing topics such as the Code of Ethics. Following the acquisition of Ingenico, a specific deployment took place to train the extended workforce. This eLearning is updated regularly to reflect any significant changes to the Code.

In 2021, 94.7 % employees have been trained to the Code of Ethics in a E-learning format.

8. Closing Statement

Worldline is globally recognised as a sector leader for its Corporate Social Responsibility programme. We understand that slavery and human trafficking risks may pose a threat to international firms and are constantly evolving in the current global environment. For this reason, each of the measures and policies described in this statement shall continue to be applied on an ongoing basis.

This statement constitutes our Group's slavery and human trafficking statement for the period between the 1st of January 2021 up to and including the 31st of December 2021 pursuant to the United Kingdom Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

This statement is made by Worldline SA on its own behalf and on behalf of its subsidiaries to whom the Modern Slavery Acts apply and whose boards have approved this statement – being Worldline IT Services UK Limited, Worldline SA, Worldline S.A./N.V., equensWorldline SE, Worldline Sweden AB, Worldline Retail Enterprise (UK) Limited, Ingenico (UK) Limited and Ingenico International (Pacific) Pty Limited. Management of the above-mentioned entities have been consulted in the preparation of the present statement. The statement has been validated by all the above-mentioned entities

The Board of Worldline SA has approved this statement on June 9, 2022.

Signed

Gilles Grapinet
CEO
June 2022