

# 1 WORLDLINE MODERN SLAVERY STATEMENT

## I. INTRODUCTION

The Worldline Modern Slavery Statement (referred to as the “Statement”) has been published as a joint statement in accordance with both the UK Modern Slavery Act 2015 and under the Australian Commonwealth Modern Slavery Act 2018.

This Statement covers the actions and measures that Worldline SA, Worldline IT Services UK Limited, Worldline Retail Enterprise (UK) Limited, Worldline S.A./N.V., Worldline Australia Pty Ltd, equensWorldline SE and Worldline Sweden AB (Worldline), took between 1st January 2022 and 31st December 2022 to ensure that slavery and human trafficking are not taking place in their supply chains and in any parts of their businesses.

The Worldline group:

- recognises 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,
- is 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.

## II. WORLDLINE GROUP STRUCTURE

### A. Our Activities and Strategy

Worldline is a European leader in payments services. We operate across the full payment services value chain, providing an extensive range of merchant acquiring, payment processing and business solution services to financial institutions, merchants, corporations and government agencies.

Worldline operates in 40+ countries and employs over 18,000 talented and dedicated experts. With a strong culture of innovation, Worldline’s objective is to enable sustainable economic growth and reinforce trust and security by making solutions that are environmentally friendly, accessible to all, support societal transformations, help clients anticipate the future, seize new opportunities and navigate their challenges with confidence.

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 its 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 has an engagement process including reporting lines on the different process which can identify, assess, and prevent Modern Slavery risk within our operations and supply chain.

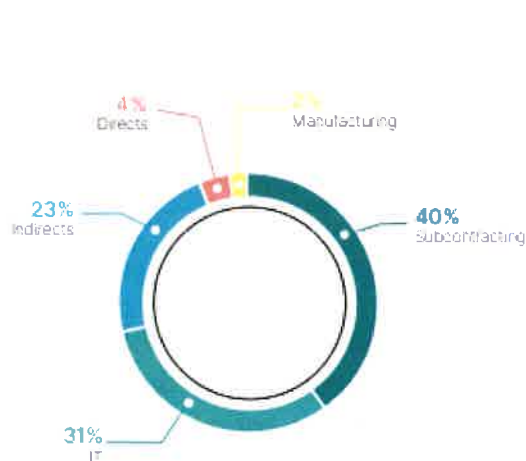
Our engagement process involves committees and meetings at global, business line, local and entity level.

## B. Our Supply Chain

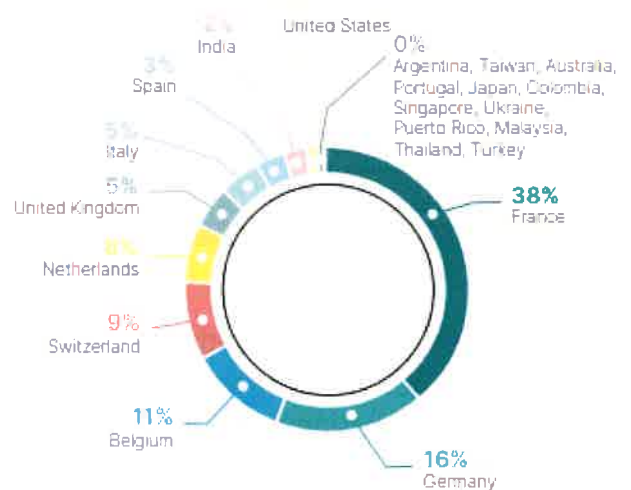
In 2022 we purchased goods and services from over 8500 suppliers.

The majority of the procurement costs, is located in Europe. The key area of spend is the IT services sector, and predominantly in IT hardware and software, software development, and maintenance and telecommunications services.

**Spend by vendor**



**Spend by country**



### III. POLICIES & PROCEDURES

#### A. Code of Ethics

Worldline's Code of Ethics has formed part of every employee's employment contract since 2011. It was reviewed, updated and approved by the Group CEO in 2022.

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.

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."*

#### B. Whistleblowing Policy

The Code of Ethics introduces the right of any Group employee to disclose behaviours or actions deemed inconsistent with the values and principles of the Code of Ethics, including Human Rights laws violation.

Worldline Global Compliance Alerts Policy gives an overview on how the Group acts on prevention, detection and reaction to compliance breaches including the protection of the person raising the alert.

To support the implementation of the policy, a Compliance alert system, the Integrity Line has been established in line with the requirements of the French Data Protection Authority (CNIL). Employees may use the Integrity Line to alert the Worldline to any non-compliance with the Code of Ethics and any other issues of non-compliance with legal obligations. Line managers, the Global Head of Compliance and Human Resources are also points of contact for any employee raising an alert.

The Global Compliance Alerts Policy seeks to ensure that the rights of employees, and the sender or subject of the alert, are protected during the whistleblowing process. Accordingly an employee who raises the alert is assured of complete confidentiality in relation to the alert.

The policy also states that the employee shall not be subjected to any penalty, retaliation, or discrimination, provided that they 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.

The Integrity Line is also made available to Worldline's third parties who are also encouraged to report any concerns.

### C. Human Rights Policy

In September 2021, the Worldline Group adopted and published its Human rights policy to reaffirm its commitment to respect and implement the international, regional and national legal framework devoted to Human Rights. This policy gives to Worldline's employees an overview of the different Human Rights at stake in our business environment and explains further the different requirements applicable to Worldline group in order to comply with the international conventions on Human Rights. It starts with focusing on different employment practices to then addressing some social impact including our supply chain management and our zero tolerance policy towards corruption.

### D. Duty of Vigilance

In 2022, Worldline published its first standalone Vigilance Plan. As required by the French Duty of Vigilance Law, Worldline identified and classified the risks that may have impacts on Human Rights, Environment and Health and Safety resulting from the Worldline operations and its supply chain.

The risks of Child Labour and Modern Slavery were assessed for the realisation of the Vigilance Plan and action plans have been defined to mitigate this risk. Each risk identified is monitored and reviewed on a regular basis.

## IV. MANAGEMENT OF MODERN SLAVERY AND HUMAN TRAFFICKING RISK

In 2022, Worldline recognised that human rights abuses, particularly Modern Slavery, pose significant risks. It conducted thorough Duty of Vigilance assessments to identify and address these risks.

Modern Slavery is a critical aspect of Worldline's Corporate Social Responsibility (CSR) materiality analysis. This analysis helps Worldline prioritise its CSR initiatives based on the most pressing issues related to its business activities and the expectations of its stakeholders. The analysis was first conducted in 2014 and subsequently updated in 2018 and 2021.

As a result of these processes, Worldline has developed action plans and implemented a comprehensive CSR program. This program places a strong emphasis on labour practices and aims to manage Worldline's operations in a responsible and ethical manner. It also integrates social and environmental considerations within the supply chain.

Specifically addressing Modern Slavery, Worldline's actions and measures primarily focus on raising awareness and conducting due diligence. By enhancing awareness, Worldline seeks to foster a deeper understanding of modern slavery risks and its consequences. Through rigorous due diligence, Worldline aims to identify and mitigate any instances of Modern Slavery within its operations and supply chain.

#### A. Risk Management related to our employees and internal activities

Our commitment to respect human rights in our workplace is embedded in our policies and procedures (see section III Policies and Procedures) . Our policies promote a safe, diverse and inclusive workplace and are reviewed regularly. Worldline also ensures that its Human Resources procedures are consistent with our commitments.

We also encourage social dialogue to promote human rights and high standard working conditions. In most countries where Worldline operates, there are employee representatives (specifically countries part of the European Union). The employee representatives meet local management on a regular basis, and attend extraordinary meetings to address specific topics, notably acquisitions and or transformations.

In 2020, we published a new Code of Ethics which was updated in 2022 and makes it clear that our core values and our "*raison d'être*" depend on an ethical approach to our stakeholders, on being a trusted partner, on respecting human rights and respecting one another. The development of the new Code of Ethics was an opportunity to introduce new topics and enhance existing topics, for example human rights and the respect for all employees. The framework for the Code of Ethics is underpinned by Worldline's four values of innovation, co-operation, excellence and empowerment.

In order to ensure complete awareness of the Code of Ethics, a mandatory training programme for all employees is in place.

#### B. Supply Chain Risk Management -Awareness

##### 1. Business Partner's Commitment to integrity charter

Worldline shares its values and commitments with its suppliers and partners through a dedicated 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 practised in their businesses and supply chains.”*

## 2. Responsible Sourcing of Minerals

We have assessed that there is a risk that our hardware suppliers (for terminals and data centre components for instance) could be involved in sourcing components from conflict regions. Worldline ensures that its suppliers are committed to assess that the minerals used in its hardware's components are neither sourced from conflict regions (e.g. Democratic Republic of Congo, Rwanda, Tanzania, Uganda, Zambia), nor from organisation that financed armed groups. In this respect, Worldline 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. The letter requires suppliers to ensure that their supply chain is conflict-free and that Worldline's Electronic Manufacturing Services suppliers should comply with the following principles:

- Take steps to determine if their products contain conflict minerals;
- If so, inform Worldline, and adopt a due diligence policy and procedures to reasonably assure that metals including (but not limited to) 3TG (tin, tungsten, tantalum and/or gold) metals and cobalt in their products or components do not directly or indirectly benefit armed groups;
- Identify all smelters in their supply chain that supply metals including (but not limited to) the 3TG and Cobalt. If they do not source directly from smelters, they have to cascade this request to their suppliers;
- Provide further evidence and statements on responsible sourcing when requested, especially during audits that may be conducted to verify compliance with the regulation.

### 3. Corporate Social Responsibility clause

A general CSR and anti-corruption clause is systematically added to all Worldline dedicated contracts with a supplier, which require the supplier to align with the Business Partner's Commitment to Integrity Charter (as described above) but also require the Supplier to align with Worldline's Code of Ethics. In case of serious non-compliance with the principles of the Charter, the supplier is to report this to Worldline within one week of discovery. Within one month of reporting the non-compliance, the supplier must determine an appropriate action plan to become compliant and seek agreement with Worldline of an appropriate timeline for its implementation.

For our Tier 1 suppliers<sup>1</sup> we may also require them to achieve a minimum score related to an extra-financial CSR rating<sup>2</sup> to be provided within the first year of contract with Worldline. Such extra-financial ratings embed a social pillar covering the Modern Slavery topics and expectations. We may also stipulate that we will reserve the right to conduct our own CSR-related on-site audit.

### C. Supply Chain Risk Management -Due Diligence

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, ethics, human rights abuse or extra-financial risks associated with the potential or existing supplier in order to ensure integrity within the supply chain.

The due diligence on suppliers is initiated at the on-boarding phase with a thorough screening (financial and non-financial) and checking of any supplier created in the database, which provides a risk assessment at supplier legal entity level. Once created and approved, the supplier follow-up is organised according to the level risk identified during the on-boarding.

**Risk Classification.** In order to manage the supplier database more efficiently and enable Worldline to take appropriate actions, we assess our Tier 1 suppliers and classify them into three different operational statuses:

- Strategic: a long-term supplier matching at least one of the following criteria: high spend, substitutability, specific technology or specified risks related to services;
- Monitored: these are not strategic suppliers but are monitored because of medium or high extra-financial or financial risks;
- Standard: 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 at a minimum, annually. It is the prerequisite of the sustainable procurement initiative which targets primarily strategic suppliers for Worldline. Notably, the EcoVadis third-

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<sup>1</sup> Tiers 1 Supplier are suppliers with whom Worldline conducts business directly

<sup>2</sup> In the EcoVadis questionnaire, there is a specific pillar devoted to labour conditions

party CSR assessment is triggered for strategic suppliers with the objective to more closely monitor their CSR performance.

In order to more easily assess the CSR practices and mitigate the risks of our strategic suppliers, Worldline has implemented its own EcoVadis supply chain platform, inviting its key suppliers (Tier 1) to be assessed by EcoVadis and share their scorecard in its platform.

For more information regarding the supplier risk assessment and due diligence, please refer to [Worldline Universal Registration Document, section D.4.](#)

## V. EFFECTIVENESS MONITORING

In order to give concrete expression to these commitments, and measure the effectiveness of its processes, Worldline has selected and followed various Key Performance Indicators (KPI).

Some of these KPIs are part of Worldline TRUST 2025 Programme which aims to accelerate the momentum in terms of CSR progress, performance and leadership around 5 commitments and 8 ambitions.

Worldline has reached or almost reached its 2025 target for these following 3 KPIs.

### A. KPIs on Supply Chain

Sustainable Procurement KPIs	2020	2021	2022	2025 Target
% of suppliers evaluated by EcoVadis with a score below 45 having an action plan to solve critical findings identified	100%	100%	100%	100%
% of expenses assessed by EcoVadis (out of strategic supplier expenses)	54% <sup>1</sup>	86% <sup>2</sup>	86.7%	90%
Percentage of expenses of Strategic suppliers out of the total Worldline spending	80%	37%	42.2%	-
% of strategic suppliers evaluated by EcoVadis	35% <sup>3</sup>	74%	78%	-
% of buyers annually trained on sustainable procurement (including Conflict Minerals)	-	65%	92.5%	-
% of spending on local suppliers (the vendor is located in the country of the purchase)	80%	80%	97.6%	-

Furthermore, Worldline also records the percentage of strategic suppliers that are evaluated by EcoVadis on an annual basis. In 2022, they were 78%. Additionally, it also monitors the percentage of buyers that are annually trained on sustainable procurement (including Conflict Minerals). In 2022, they were 92.5%.



## B. KPIs on Internal Processes

Topic	Indicator	2021	2022	Target 2025
Ethics & Compliance	% of alerts investigated and related actions plan defined within 2 months	87%	96%	100%
	% of completion of the Code of Ethics Mandatory Training <sup>3</sup>		86%	

## C. Internal Controls

Worldline embraces a continuous risk assessment of processes related to the prevention and detection of Modern Slavery, notably through implementation of internal controls especially on processes related to our Supply Chain.

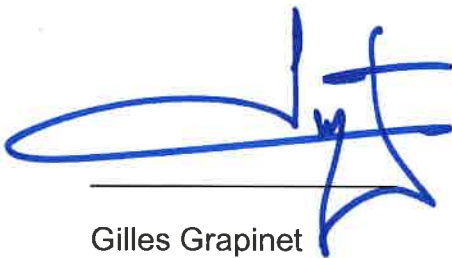
### CLOSING STATEMENT

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 they 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 1<sup>st</sup> January 2022 up to and including the 31<sup>st</sup> December.

This Statement is made by Worldline SA on its behalf and on behalf of its subsidiaries to whom the UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018 apply, being Worldline IT Services UK Limited, Worldline Retail Enterprise (UK) Limited, Worldline SA, Worldline S.A./N.V., Worldline Australia Pty Ltd, equensWorldline SE and Worldline Sweden AB.

The board of Worldline SA has approved this Statement on the 8<sup>th</sup> June 2023



Gilles Grapinet  
CEO  
June 2023

<sup>3</sup> Please note that although this training is not solely devoted to human rights, it does refer to them, through the Code of Ethics

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