

Global Payments
Modern Slavery Statement

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1. Introduction

This Statement covers the activities of Global Payments Australia and its subsidiaries that are reporting entities for the purposes of the *Modern Slavery Act (Cth) 2018*. Global Payments Australia's subsidiaries are Ezidebit Pty Ltd, Web Active Corporation Pty Ltd (collectively the "**Payments Arm**"), Sentral Pty Ltd, Our Online Canteen Pty Ltd, Pigeonhole Software Pty Ltd and Storman Holdings Pty Ltd (collectively the "**Software Arm**").

The Payments Arm is a Business-to-Business (B2B) service provider of domestic payment-related products. It is also a provider of fraud prevention solutions and technology to support our merchants with card compliance obligations (PCI-DSS).

- **Web Active Corporation Pty Ltd** trading as Eway facilitates the acceptance of online payments for merchants (e-commerce payment processing).
- **Ezidebit Pty Ltd** provides electronic payment processing such as Direct Entry, BPAY, eftpos, card acquiring services and NPPA real-time payment services.
- **Global Payments Australia 1 Pty Ltd** provides wholesale payment processing solutions to payment facilitators.

The Software Arm creates software products to support specific industries by providing technology, distribution, and product development.

- **Sentral Pty Ltd** provides schools, government, and non-government departments with a comprehensive software platform for the administration, management and reporting of school and student data in Australia.
- **Pigeonhole Software Pty Ltd** trading as Class Creator provides software to aid in the data collection and sorting of students into preliminary class sets by a school and/or its administrators.
- **Our Online Canteen Pty Ltd** trading as QuickCliq is a cashless online ordering system for schools to manage canteen orders, uniforms, books, and school fees.
- **Storman Software Pty Ltd** provides self-storage operators with an all-in-one solution for reservations, administration, management, and collection of storer payments.

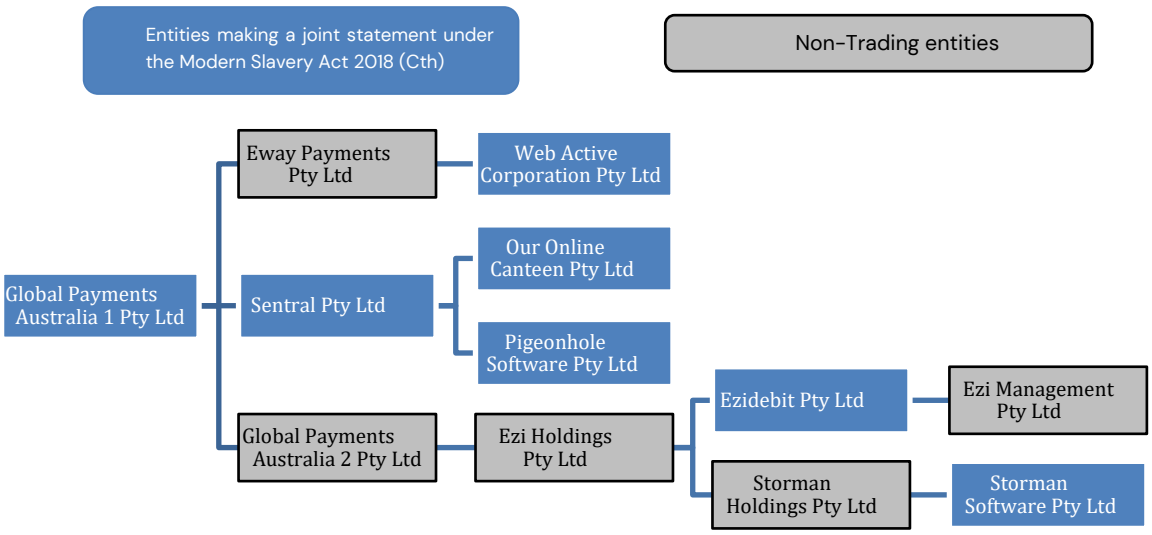
2. Our structure, operations, and supply chains

Organisational Structure

Global Payments Inc ("**GPN**") is a leading payments technology company delivering innovative software and payment services to customers globally. GPN is a Fortune 500 company and a member of the S&P 500 with worldwide reach spanning 170 countries throughout North & South America, Europe, Asia Pacific, and Oceania.

As of 31 December 2023, GPN controls twelve legal entities in Australia. While not technically a reporting entity for the purposes of the Modern Slavery Act (Cth) 2018, GPN is also covered by this statement for the purposes of meeting Modern Slavery reporting requirements as the

Modern Slavery compliance framework is managed at both the enterprise and local level. A simplified structure of GPN's Australian reporting entities is provided below.



Operations

In Australia, Global Payments operate from corporate offices in Brisbane, Qld (Payment arm) and Sydney, NSW (Software arm).

Global Payments software and payments products are developed internally; however, consideration may be given to third-party external capabilities to reduce significant capital outlays or to obtain specific expertise. Therefore, we selectively use local and international specialist technology providers, which provide access to enterprise solutions and continuous 24-hour coverage to support our operations.

At Global Payments, we focus on driving innovation that creates positive change for the benefit of people, customers, and communities around the world through various initiatives that support our four global responsibility pillars: Culture and Values, Environmental Sustainability, Community Impact and Corporate Responsibility.

Culture and values

Our culture dictates how we accomplish our goals and achieve results as an organisation. There are several key principles to creating a strong culture.

First and foremost is community, creating an environment where everyone feels welcome. Our DEI initiatives have well defined goals, supporting the communities in which we live and work globally.

Second is fairness, providing everyone a fair opportunity to grow and be rewarded for the work that they do.

Third is accountability which starts at the very top using leading governance practices to establish strong leadership in our boardroom and local leadership teams.

Global Payments is committed to upholding the highest standards of ethical conduct. To put our mission and values into action, the Employee Code of Conduct and Ethics gives all team members the tools to respond to situations that might violate our standards and company expectations.

Environmental Sustainability

Global Payments is committed to minimising our environmental footprint and achieving a net zero emissions target by 2040 by working to migrate its workstreams to the cloud, reducing paper waste and slowly eliminating paper-based processes.

Community Impact

Global Payments serve our communities by advancing education, promoting fairness and encouraging our staff to spend a workday giving back to their respective communities.

Corporate Responsibility

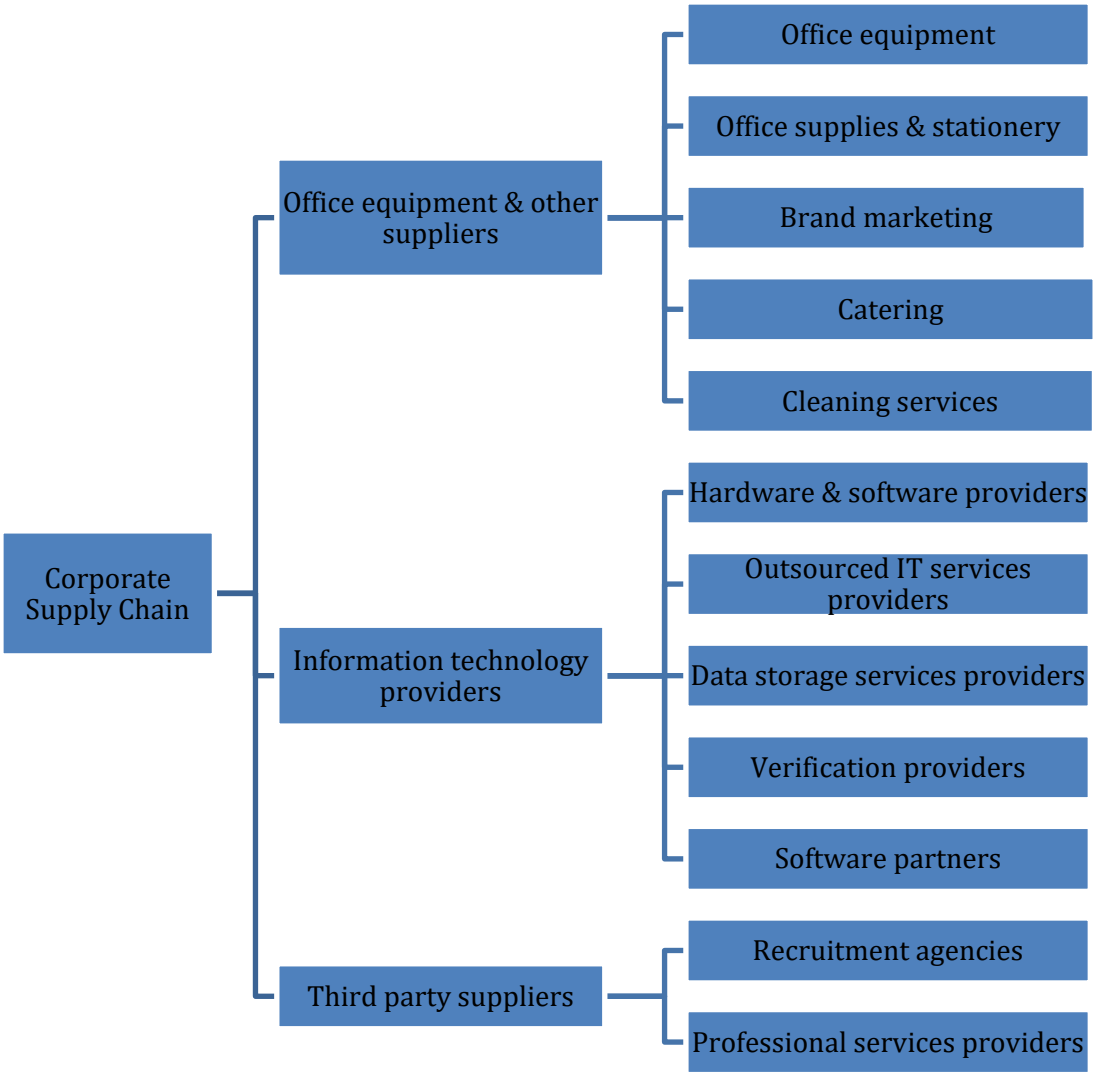
Global Payments conducts all business ethically and in compliance with the law in each jurisdiction. All company employees receive annual training to help us mitigate risk and reinforce our values.

Supply Chains

While GPN's operations and supply chains are wide ranging, our aim is to ensure staff clearly understand and respect human rights; that staff and our supply chain uphold these rights. We expect our partners and stakeholders to adhere to ethical business conduct consistent with our own and are committed to working with them to fulfil this common goal.

Global Payments is committed to acting ethically and with integrity in all of our business relationships. We will not tolerate any form of modern slavery, and have policies and frameworks to help prevent such activity from taking place in our business or supply chains.

Areas where modern slavery risks can potentially arise include:



3. Modern Slavery risk assessment

Information Technology providers

Although modern slavery can occur anywhere in the world, there are countries where modern slavery risk is deemed to be higher. These include North Korea, Eritrea, Mauritania, Saudi Arabia, Turkey, Tajikistan, United Arab Emirates and Russia. However, analysis of local supplier payments indicates that 77% of annual supplier payments are paid to Information Technology providers based in Australia and North America, which have labour laws and anti-discriminatory frameworks in place.

Hence modern slavery risk is considered relatively low for this supplier segment.

Third Party suppliers

Recruitment agencies are used to source potential candidates for local vacant positions. These agencies are located in Australia and recruited staff must either be Australian citizens, Australian permanent residents or hold authorised work permits.

Professional services providers include law firms, accounting firms, auditing firms, advertising firms, and IT professionals. Individuals are highly skilled and expect market rates for the professional services they provide.

Analysis of local supplier payments indicates that 20% of annual supplier payments are paid in relation to brand advertising service providers based in Australia

Hence modern slavery risk is considered relatively low for this supplier segment.

Office equipment and other suppliers

Global Payments has identified areas of vulnerability in our supply chain that might potentially cause or contribute to higher modern slavery risks, which include:

1. Purchase of Office equipment – While Global Payments is not directly involved in the production of computer hardware, we acknowledge that the electronics manufacturing industry is recognised as a high-risk industry for modern slavery or maltreatment due to manufacturing of component parts occurring in locations with minimal regulatory oversight.
2. Purchase of Third-party marketing merchandise – industries associated in the production of promotional products (e.g., clothing, USB sticks, mugs, pens, coasters, bags, etc.) may have production lines that involve workforces with a higher proportion of low skilled workers with poor working conditions which can lead to an increased risk of modern slavery and maltreatment of workers.
3. Use of contract services (e.g. catering, event management, venue hire, janitorial services, etc.) – these industries are recognised as high risk for modern slavery due to the potential exploitation of temporary or migrant workers who may have a limited understanding of employee rights under Australian law, or may involve poor working conditions including, but not limited to, wage theft, inadequate record keeping, wages below Australia's minimum wage requirements, and denial of employee benefits such as leave entitlements or superannuation.

Based on our business model, we do not have intricate supply chains, multiple contractor or subcontractor levels, or direct vendor relationships with manufacturing businesses where modern slavery has been found to be an issue. Furthermore, analysis of local supplier payments indicates that 2% of annual supplier payments are paid in relation to this supplier segment.

Whilst recognising that modern slavery risk may exist in non-strategic sourcing categories as mentioned above, we are committed to working with our vendors to improve transparency and compliance with the Modern Slavery Act.

4. Modern Slavery control framework

Global Payments acknowledges its role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. Accordingly, Global Payments will not tolerate any unethical behaviour by its suppliers and acknowledge that association with any

such supplier may potentially negatively impact Global Payments' brands and reputation and/or lead to breaches of applicable laws or regulations.

Therefore, Global Payments adopted a control framework to help prevent unethical behaviour from taking place in our supply chain, as described below.

Vendor policies

Vendor outsourcing allows the business to focus on key competencies whilst entrusting third parties with business components in which they specialise. However, a certain degree of risk becomes present each time the business relinquishes control of part of its processes. Hence specific policies have been developed to manage vendor risk to mitigate the potential adverse events that could cause harm to our reputation and overall ability to achieve enterprise success.

VRM Policy

The Vendor Risk Management ("**VRM**") Policy sets forth the roles and responsibilities of stakeholders responsible for the governance of processes related to the engagement, assessment, and review of third-party vendors.

VRM-RADD Policy

The VRM Risk Assessment and Due Diligence ("**VRM-RADD**") Policy defines the risk management activities that must be performed prior to the establishment of a new relationship or significant change in an existing relationship between a vendor and Global Payments.

VRM-OMR Policy

The VRM Ongoing Monitoring and Reporting ("**VRM-OMR**") Policy defines the ongoing vendor performance monitoring, residual risk refresh and reporting activities essential to ensuring vendor risk is appropriately managed and remains within the Global Payments' risk appetite and tolerance levels.

Vendor management process

Effective vendor management is critical to maintaining Global Payments' operations as well as satisfying regulatory obligations. GPN engages thousands of vendors globally for a range of services, including supply by non-trade or unskilled workers to semi-skilled and professionals.

Vendor Management Program Office

The Vendor Management Program Office ("**VMPO**") is responsible for the on-boarding of new vendors across the entire organisation.

Due diligence and risk assessment

Initial and ongoing due diligence and risk assessment on all vendors are mandatory irrespective of the nature of service provided.

Vendor Assurance

The vendor assurance is conducted by Global Payments' global procurement team. In addition, a comprehensive vendor assurance questionnaire requires all prospective vendors to respond to direct questions regarding any practices that would identify an increased modern slavery risk.

Vendor contracts

Our standard vendor agreement requires each vendor to acknowledge our Code of Conduct and Ethics and to comply with applicable laws and regulations.

Ongoing Monitoring and Reporting

GPN generally does business with large international and national vendors who have their own environment, social responsibility, governance ("**ESG**") and corporate sustainability programs.

Global Payments' standard contract terms and conditions stipulate vendor compliance with all applicable laws and Global Payments' Code of Conduct and Ethics.

The VMPO is responsible for periodically evaluating Tier 1 and Tier 2 vendors against 5 core principles: regulatory compliance, transparency in sourcing practices, ethical conduct, proactive reporting, and resolution of any contractual breaches or matters of concern.

On a local level, Global Payments procurement, IT and compliance teams perform ongoing monitoring of vendors rated as Tier 3 or Tier 4. Each supplier is assigned to a Vendor Manager whose responsibility is to maintain oversight of the supplier's performance and to report any matters of concern. Each new supplier is subjected to supplier due diligence, including the periodic completion of a modern slavery questionnaire which is reviewed and assessed by the local compliance team.

Given that local suppliers are engaged to provide services to either a subsidiary or the entire Global Payments Australia group, an annual review of local suppliers is facilitated by the local compliance team working in consultation with each supplier's Vendor Manager.

If any breaches occur or we have reasonable grounds to believe that modern slavery is taking place, we will take the following actions:

- Evaluate the severity of the issue and seek expert guidance
- If severe, determine whether Global Payments can exit the relationship without placing further harm to the victim; or
- If it is not severe or the relationship cannot be exited without causing further harm to the victim, we will work with the vendor to develop an improvement plan and perform regular audits to monitor progress and resolution.

Training

Every employee is required to undergo mandatory compliance training, which includes the Code of Conduct and Ethics and the Whistleblower policy. Training ensures that staff understand their responsibilities and are cognizant of the potential modern slavery risks in our supply chain, our obligations when onboarding new vendors, identifying instances of modern

slavery, and the obligation to report any concerns about modern slavery within the organisation and/or our supply chain.

Code of Conduct and Ethics

Through the Code, our company values and our policies seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations in every aspect of our business. We promote awareness through internal policies, communications and training.

Whistleblower Policy

Global Payments' offer multiple reporting channels to our employees, consultants, vendors, and business partners, including a web portal and telephone hotline to report concerns anonymously. Our Whistleblower policy prohibits retaliation against anyone who, in good faith, reports any matter relating to modern slavery or who assists in the investigation of a reported concern.

5. Modern slavery framework review

Global Payments acknowledges that on-going action is required to mitigate the risk of modern slavery. Global Payments periodically assesses its approach and effectiveness of its controls when identifying and managing modern slavery risk.

To measure control effectiveness, the following performance areas were reviewed:

- Ongoing monitoring of adherence with the Vendor Risk Management policy by Compliance teams (Line 2) and Audit (Line 3)
- Risk assessment tiers were assigned to all new vendors
- Evidence of ongoing monitoring and frequency of interaction between vendor manager and the vendor
- Completion rates for Code of Conduct training; and
- the number of modern slavery cases identified and reported.

The local review and consultation process are facilitated by the local Compliance team working across the Payments and Software business. Although there are seven legal entities covered by this joint statement, there are only two sites where staff and location resources are jointly shared. This enables the seamless sharing of information between Payments and Software teams.

6. Board Approval

This Joint Statement is made pursuant to section 13 of the Commonwealth Modern Slavery Act 2018 and constitutes our Modern Slavery Statement for the calendar year 2023. This statement was approved by the Board of Directors of Global Payments Australia 1 Pty Ltd in

their capacity as the principal governing body for the Global Payments business in Australia on 24 July 2024.

Authority to sign this Modern Slavery statement on behalf of the Board was delegated to Masseh Haidary on 24 July 2024.



Masseh Haidary
CEO - Payments
Global Payments Australia