



Flywire (Singapore) Pte. Ltd - Registration Number 201508961K

This Modern Slavery Statement (Statement) is made in accordance with sections 14 and 16 of the *Modern Slavery Act 2018 (Cth), Australia* (the Act). Flywire Singapore is wholly owned by Flywire Corporation (US) (Flywire Corporation). This Statement incorporated Flywire Corporation's 'Modern Slavery and Human Trafficking Statement'.

The Act requires certain commercial organisations to identify and address their modern slavery risks and maintain responsible and transparent supply chains.

This Statement was approved by Flywire Singapore's Business Steering Committee (Business Steering Committee) on 12 November 2025. The decision of the Business Steering Committee was endorsed and approved by the Flywire Singapore Board on 19 November 2025.

The employees of Flywire Singapore and its Australia and New Zealand entities were consulted to ensure that they fully understand their obligations in the Statement and the Modern Slavery topic is part of the Flywire regular training for employees. Flywire Singapore wholly owns these entities listed below and this Statement applies to them as well.

- 1) Flywire Pacific Pty Ltd (Australia) - ACN: 613 522 679;
- 2) Cohort Solutions Pty Ltd (Australia) - ACN 154 889 139;
- 3) Learning Information Systems Pty Ltd (Australia) - ACN 003 920 107;
- 4) OSHC Australia Pty Ltd - ACN: 161 290 884; and
- 5) Cohort Solutions (NZ) Ltd - NZ No.: 5857910.

Introduction

Flywire is a leading global payments enablement and software company. Our next-gen payments platform, proprietary global payment network and vertical-specific software help our clients get paid and help their customers pay with ease—no matter where they are in the world. Our clients rely on us for integrated solutions that are both global and local, combine tailored invoicing with flexible payment options, and deliver highly personalized omni-channel experiences. We believe we make generational advances for our clients by transforming payments into a source of value and growth for their organizations while delighting their customers with payment experiences that are engaging, secure, fast, and transparent.

Flywire Values

Flywire recognizes its role as a global leader in payments processing and its resulting responsibility to respect and protect the rights of our personnel and our broader stakeholders, which includes adherence to Flywire's core values – global collaboration, fulfillment, evolved learning, authenticity, execution and ambitious innovation.

Our management team is committed to building a culture that supports every individual on their professional journey, and supports physical and mental health, personal dignity, dedicated programs to enhance equity, inclusion and diversity, and a charitable foundation supporting higher education students focused on global health, social justice and global citizenship.

Responsible Recruitment

Flywire's workforce continues to consist of primarily permanent employees. Flywire sources personnel directly or through specified, reputable employment agencies. Flywire maintains a skilled workforce that is not composed of traditionally vulnerable groups. All Flywire personnel are subject to background checks as part of the onboarding process. As a result, Flywire faces minimal risk of experiencing modern slavery and human trafficking issues within its workforce.

Lawful and ethical behaviour in hiring is critical to our continued success. Flywire fully supports the zero-tolerance policies adopted by the U.S., U.K., Australia and other governments to combat modern slavery or the trafficking of persons for any purpose. To this end, Flywire strictly prohibits, in line with any applicable regulation including the Modern Slavery Act:

- The use of recruiters that do not comply with local labor laws in the country in which the recruiting takes place;
- Using misleading or fraudulent practices in the recruitment of personnel or offering of employment, such as failing to disclose, in a format and language easily accessible to the worker, basic information or making material misrepresentations during the recruitment of personnel regarding the key terms and conditions of employment;
- If required by law, failing to provide an employment contract, recruitment agreement, or other required work document in writing and in a language the individual understands.

Workplace Practices

Flywire is committed to the safety and well-being of its personnel. To this end, Flywire has implemented the following workplace practices:

- Flywire is an equal opportunity employer and administers all employment decisions and personnel actions without regard to race, color, religion, sex, pregnancy, gender identity, national origin, age, ancestry, physical or mental disability, sexual orientation, genetic disposition or carrier status, veteran status, or any other category protected under applicable national, federal, state, or local law.
- Flywire is committed to ensuring that all personnel are able to enjoy a work environment free of discrimination and harassment, including but not limited to sexual harassment. This requires that each individual treat with courtesy and respect every other individual with whom they have contact in the course of workplace engagement. Flywire strictly forbids discrimination or harassment of any kind, including discrimination based on race, color, religion, sex, pregnancy, gender identity, national origin, age, ancestry, physical or mental disability, sexual orientation, genetic disposition or carrier status, veteran status, or any other category protected under applicable national, federal, state, or local law. This extends to each and every level of Flywire's operation. Accordingly, any form of harassment, whether by a fellow employee or contractor, manager, supervisor, or by a third-party doing business with Flywire, will not be tolerated.
 - If an individual believes that they have been the subject of discrimination or harassment or has witnessed discrimination or harassment in the workplace, the individual should immediately bring concerns to the attention of People & Culture (HR), a supervisor, or any member of management with whom the individual is comfortable.
 - Flywire takes allegations of discrimination or harassment very seriously and will actively investigate all complaints. If it is determined that discrimination or harassment or any

other inappropriate or unacceptable conduct has occurred, management will take appropriate disciplinary action against the offending person(s), up to and including termination of employment.

- Retaliation against personnel for reporting or complaining of discrimination or harassment, or for cooperating in the investigation of a report or complaint, is unlawful and will not be tolerated. Any retaliation will warrant disciplinary action.

Training and Awareness

Flywire requires all its personnel to undergo training on specific topics relevant to human dignity and human rights, including privacy and protection of personal information, ethical conduct, anti-harassment, health and safety, anti-money laundering (AML) and counter-terrorist financing (CTF), and legal compliance across a range of matters including anti-bribery and anti-corruption.

Our policies are consistent with human rights principles and our commitment against slavery and human trafficking both within our business and by the suppliers that support our organisation. Our policies, training and company-sponsored initiatives include a range of important topics:

- Code of Conduct
- Corporate Governance Guidelines
- Insider Trading
- Conflicts of Interest
- Whistleblowing
- AML/CTF
- UK Anti-Bribery Act
- U.S. Foreign Corrupt Practices Act
- Anti-Harassment
- Privacy and Information Security
- General Data Protection Regulation (GDPR)
- Employee Resource Groups (ERGs) and ally training

Supply Chain Management

Like most multinational businesses, Flywire works with suppliers on a global scale. Flywire is dedicated to protecting and advancing human rights in all our operations, including by ensuring that our products and services are ethically and sustainably sourced. We expect our suppliers to uphold these same principles. To this end, we look beyond our operations to the wider supply chain, where the biggest impacts occur. Flywire's supply chain consists of general business and technology suppliers, payment processing and collection partners, and specialist services such as healthcare providers, pension, and employee benefit services. Flywire does not source products or commodities from high-risk jurisdictions.

To mitigate any reputational and integrity risks in its supply chain, Flywire performs a comprehensive due diligence vendor risk assessment of all its suppliers and affirmatively abstains from entering a contractual relationship with any supplier that does not demonstrate ethical and socially responsible behaviour that aligns with Flywire's values.

- All of Flywire's suppliers are thoroughly vetted through a risk assessment and due diligence process that includes input and evaluation from IT, engineering, finance, legal & compliance and risk & security teams.
- This process includes establishing that a proposed supplier: (1) has technology and security protocols in place to protect the personal data of Flywire, its personnel, and customers, and (2)

aligns with Flywire values, including with respect to lawful and ethical behavior as outlined below.

Governance

To further the effective implementation of Flywire's values, Flywire shall engage in internal monitoring and recommend changes to these practices as Flywire's leadership team deems advisable.

- Flywire leadership will act as role models by incorporating these practices and considerations into decision-making in all business activities.
- Flywire leadership will ensure that appropriate organizational structures are in place to effectively identify, monitor, and manage integrity issues and performance relevant to Flywire's business and report to the Executive Team as needed.
- Flywire's policy committee will continually review and monitor changes or additions to regulations and industry standards to adopt new policies or changes thereto – to reinforce conduct consistent with Flywire values and ensure continued compliance.
- Flywire leadership will ensure that all personnel receive internal training where applicable for workplace policies, and that there are awareness activities around expectations for supply chain management and opportunities for community engagement.

Conclusion

Together, we at Flywire recognise that there is much to do to condemn and prevent modern slavery and human trafficking, and we are excited to stand with so many great companies in being an active advocate for human rights and personal dignity and look forward to helping to build a more free, respectful and inclusive future for all.

This statement will be reviewed annually.



Frans Wiwanto

CEO and Director - Flywire Singapore
Chairman - Flywire Singapore Board
Flywire Singapore, Singapore
19 November 2025