Modern Slavery Statement – FY 2024

1.	Reporting entity	2
2.	Structure, Operations and Supply Chain	2
3.	Risks of Modern Slavery at Adyen Australia	2
4.	Actions taken by Adyen Australia to mitigate Modern Slavery Risk	3
5.	How Adyen assesses effectiveness of measures	5
6.	Consultation process	6
7.	Governing Body Approval	6



Reporting entity

Adyen Australia Pty Limited (together "Adyen Australia", "we", "us" or "our") makes this statement pursuant to the *Modern Slavery Act 2018* (Cth) (the 'Act') for the period of 1 January 2024 to 31 December 2024 ("Reporting Period"). This statement outlines the steps we have taken to identify, mitigate and combat risks of modern slavery in our supply chain and business operations.

Structure, operations and supply chain

Adyen Australia is a proprietary limited company incorporated in Victoria, Australia with ACN 162 682 411.

Adyen Australia is a wholly owned subsidiary of Adyen N.V. ("Adyen"), a public company incorporated under the laws of, and domiciled in, the Netherlands with shares that are listed on Euronext Amsterdam. Adyen operates through its 28 offices around the world and provides services in the digital sector, mobility sector, platforms and marketplaces, retail sector, food and beverage industry, hospitality sector and subscription sector.

Adyen manages the entire payments lifecycle, encompassing gateway, risk management, processing, issuing, acquiring and settlement. This comprehensive approach includes direct connections to local and international card and banking networks, underpinning Adyen's role as a strategic partner across multiple verticals.

Adyen strives to verify that all its third parties adopt ethical and socially responsible behaviour and adhere to internationally recognised human rights standards, including appropriate working conditions, such as prohibition of child labour or any practice contrary to slavery.

Adyen Australia's Board of Directors maintains oversight of the company's approach to modern slavery, ensuring there is continuous awareness, understanding, and management of modern slavery risks across its operations and supply chain. Adyen Australia is committed to working with its Third Parties (defined as any entity, organisation or individuals who engage with Adyen for the provision of certain products or services or other business purposes (together, "Third Parties" and "Third Party")) who share the same values and comply with applicable laws and ethical standards, including those related to the prevention of modern slavery.

Risks of modern slavery at Adyen Australia

Modern slavery is a serious human rights violation that can exist in any industry, with serious implications for affected individuals. It also harms fair market competition, undermines ethical business practices, and creates serious legal, financial, and reputational risks for entities that fail to identify and address such practices within their operations or supply chains. Australia has been at the forefront of the global efforts to combat modern slavery. However, the risk of modern slavery remains and must be addressed through continuous vigilance, proactive risk management, and responsible business practices. In 2024, Australia was ranked <u>Tier One</u> in the US Department of State's Trafficking in Persons Report - one of only 33 countries to receive this recognition, highlighting its strong commitment and effective efforts to combat human trafficking.

Adyen Australia recognises the significance of addressing modern slavery risks in its operations and supply chain. Through its ongoing risk assessment processes, Adyen Australia has identified specific



areas of its business that may present a heightened risk of causing, contributing to, or being directly linked to modern slavery practices. These areas include:

- 1. Contingent labour services such as janitorial, security, catering, and event management;
- 2. Procurement of hardware and software; and
- 3. Marketing merchandise.

Adyen Australia is committed to working collaboratively with its Third Parties to enhance transparency, reinforce compliance, and maintain the integrity of its supply chain in alignment with modern slavery obligations and ethical sourcing principles.

Actions taken by Adyen Australia to mitigate modern slavery risks

Adyen Australia is committed to operating an ethical and sustainable business. Adyen recognises that modern slavery risks can still arise through its technology partners, outsourced services, customer relationships and corporate operations. As such, Adyen maintains a zero-tolerance approach to unethical conduct, including any form of modern slavery, within its operations and throughout its Third-Party vendor relationships. Adyen Australia recognises that any association with Third-Parties engaged in such practices could negatively impact Adyen's reputation and brand, lead to breaches of applicable laws or regulations and applicable sanctions, and/or jeopardise its future viability.

Third-party management policy

Adyen Australia has adopted robust systems and controls designed to help prevent non-ethical behaviour, including modern slavery, within its supply chains. All Third-Party vendors engaged by Adyen Australia are subject to Adyen's Third-Party Management (TPM) policy, which outlines the processes relating to the engagement, assessment, and ongoing review of Third Parties in Adyen's supply chain. This policy is managed by Adyen's Third-Party Vendor Management team and is supported by Adyen's second line of defense teams. To ensure ongoing effectiveness, the Third-Party Vendor Management team reviews the TPM Policy regularly, and at least annually, in accordance with the applicable regulatory requirements. This review ensures continued alignment with Adyen's global commitment to ethical conduct and sustainability, as well as compliance with the requirements of the Act.

Third-party risk assessment and periodic review

Central to Adyen's Third-Party risk management framework is the identification, mitigation and monitoring of Third-Party risks. During the Third-Party risk assessment, Adyen Australia will take into consideration factors including:

- 1. the country in which the services are performed; and
- 2. whether the services performed are critical to the daily operations of Adyen Australia.

Adyen Australia takes into consideration additional factors, including the reputational history of the Third Party to further assess the potential risk of modern slavery associated with the Third Party.

Following the onboarding of a Third Party to provide services for Adyen Australia, periodic reviews are conducted to re-verify and confirm the information gathered during the onboarding process, including details related to modern slavery risks. This ensures Adyen Australia maintains up-to-date and accurate records of its Third Parties, particularly regarding their compliance with modern slavery laws.



Each year, modern slavery questionnaires are sent to the Third Parties engaged by Adyen Australia. These Third Parties are required to complete the questionnaires, which assess the presence and effectiveness of modern slavery policies; due diligence procedures applied within their supply chains and any known incidents or risk of modern slavery. Completion of the questionnaire is mandatory and forms part of Adyen Australia's ongoing due diligence obligations.

In addition to the questionnaire, Adyen Australia reviews modern slavery statements from its Third Parties that are classified as reporting entities under the Act.

With this process put in place, Adyen Australia is committed to ethical sourcing and responsible business practices, ensuring that its Third Parties comply with all relevant modern slavery laws.

Where Third Parties fail to meet our modern slavery expectations and in accordance with the Modern Slavery Act, Adyen will seek to engage with them to support with the improvement of their practices or apply a risk-based approach taking into account factors such as the size of the Third Party. In the event of a severe non-compliance with modern slavery laws or Adyen's standards, potential consequences may include termination of the Third-Party relationship and/or the referral to the law enforcement authorities.

Grievance Channels

Adyen strives to maintain a culture in which its employees are encouraged to ask questions and raise concerns about compliance. To this end, Adyen has implemented a Whistleblower Policy that encourages the reporting of suspected wrongdoings, including modern slavery and any other human rights violations. This policy applies to all employees as well as Third Parties that do business with Adyen. Adyen's senior management is responsible for responding to concerns raised under the Whistleblower's Policy, ensuring the concerns are addressed in a timely and appropriate manner in accordance with the policy's procedure.

Australia-based employees may also contact Adyen Australia's Regulatory team as a designated reporting channel under the Whistleblower Policy.

In addition, Adyen's Global Anti-Bribery and Corruption ('ABC') Policy reflects its commitment to preventing bribery and corruption in all forms, including modern slavery. The ABC Policy outlines clear responsibilities for Adyen's employees, Third Parties and partners, as well as customers, reinforcing an overall culture of integrity, transparency and ethical conduct across Adyen.

The grievance channel available to all Adyen employees is Adyen's Speak Up tool. The Speak Up tool, maintained by the Integrity Risk Committee, provides employees with a confidential and secure platform to report any suspected wrongdoings, including potential modern slavery risks. All reports submitted through the Speak Up tool are documented in accordance with Adyen's Data Privacy Policy, which is readily available via Adyen's website.

If a case involving modern slavery is identified through Adyen's grievance channels, Adyen ensures each case is thoroughly reviewed. Where appropriate, the case will be formally investigated and addressed in a timely manner.

To date, Adyen Australia has received no cases related to modern slavery through the above-mentioned grievance channels during this Reporting Period.

Training

All employees at Adyen Australia are required to complete mandatory training, which includes training on modern slavery, anti-money laundering and anti-bribery and corruption obligations. This training



ensures Adyen's employees have a clear understanding of modern slavery risk within Adyen's supply chain, outlines the responsibilities when onboarding Third Parties, helps identify potential instances of modern slavery, and emphasizes the obligation to report any concerns regarding modern slavery within the organisation or supply chain.

Adyen Australia is pleased to report a 100% completion rate for its modern slavery training during the Reporting Period.

How Adyen assesses effectiveness of measures

- During the Reporting Period, Adyen Australia assessed the effectiveness of its actions by addressing modern slavery risks across its Third-Party relationships, training and education initiatives, and governance framework. To support the efforts in identifying and mitigating modern slavery within its operations and supply chain, Adyen implemented the following measures: Due Diligence and Risk Assessment of Third Parties Adyen Australia conducts periodic reviews on its Third Parties to ensure that there is no risk of modern slavery in its supply chain. In addition to the due diligence measures, Adyen performs sanction screening against sanctions lists as part of the Due Diligence phase.
- Materiality Assessment To deepen its understanding of the environmental, social and governance (ESG) issues that are most critical to long-term sustainability, Adyen has iterated its ESG practices by expanding the ESG Working Group which includes representatives from Adyen's reporting, risk, legal, communications and sustainability teams. Adyen's ESG Working Group plays a key role in identifying and addressing ethical issues relevant to Adyen Australia, including modern slavery risks.
- Supplier Code of Conduct Adyen exercises significant influence over its supply chain partners
 and remains committed to sourcing ethically and responsibly. Successfully implementing the
 Supplier Code of Conduct enables Adyen to set clear ethical expectations for suppliers, reduce
 risk, and enhance brand reputation and trust. The Code of Conduct also supports stronger
 supplier relationships and helps ensure consistent standards are upheld globally. To promote
 transparency and reinforce ethical expectations, Adyen makes its Supplier Code of Conduct
 publicly accessible on the company website.
- Training and Awareness Adyen Australia regularly reviews the content and effectiveness of its training to ensure employees are kept informed about modern slavery risks and understand the importance of conducting due diligence when onboarding Third Parties. Adyen Australia monitors completion rates to ensure full participation in its employee training, ensures that the training is aligned with the standards outlined in the Modern Slavery Act and is readily accessible to all Adyen Australia's employees for ongoing reference.
- Policies Adyen reviews and updates its policies (Third Party Management Policy, Whistleblower Policy, Anti-Bribery and Corruption Policy, etc.) regularly to ensure that the modern slavery risks and obligations are aligned with the organisational stance on modern slavery.
- Annual Control Test Adyen's Internal Control team is responsible for reviewing the internal
 measures and testing the effectiveness of these measures against Adyen Australia's
 obligations under the Modern Slavery Act. Adyen's Internal Control team works closely with
 Adyen's Regulatory team to ensure that all testing procedures are completed thoroughly, and
 the appropriate supporting evidence is documented.



Adyen Australia will continue to assess and monitor the effectiveness of its actions when identifying and managing modern slavery risks. Adyen Australia is committed to continue the development of these measures so that it is constantly improving its response to modern slavery. Adyen Australia has not received any allegations or complaints in relation to Modern Slavery during the Reporting Period.

Consultation process

Adyen Australia does not own or control any entities and therefore this criterion is not applicable.

Governing Body Approval

This statement has been approved by Adyen Australia's Board of Directors in their capacity as principal governing body of Adyen Australia on 16 June 2025.

DocuSigned by:

Hayley Fisher

Hayley Fisher

Director, Adyen Australia