

## **PAYPOINT PLC: SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction from the Chief Executive**

Slavery, including modern slavery, is a crime and a violation of fundamental human rights. At PayPoint, we have a zero-tolerance approach to slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls in order to: ensure that slavery is not taking place anywhere in our own business; and encourage partners in our supply chains to adhere to our standards on modern slavery and human trafficking.

### **Our policies on slavery and human trafficking**

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our code of conduct on modern slavery, which is available to our suppliers, sets out what is required of a PayPoint supplier in respect of addressing and eliminating forced labour pursuant to the Modern Slavery Act 2015 (the Act).

Our suppliers are expected to comply with our code of conduct on modern slavery or are required to have policies and procedures in place which ensure the prevention of the abuses and exploitive behaviours associated with modern slavery and human trafficking.

### **Organisation's structure**

PayPoint plc is the group holding company with subsidiary undertakings in the UK and Romania. The annual turnover for PayPoint is in excess of the £36m threshold set under section 54 of the Act.

### **Our business**

PayPoint plc and its subsidiaries are engaged in providing clients with specialist consumer payment services which includes transaction processing and settlement through an established network of retailers (Payments business). It also provides an array of services essential to convenience retail (Retail services business).

#### *Payments business*

PayPoint processes over 10 million consumer transactions per week for payment products and services collecting payments on behalf of leading utility and customer service organisations in retail outlets across the UK and Romania. Retail outlets using PayPoint's technology are able to provide consumers with a one-stop-shop for making cash payments for the wide range of PayPoint's clients. PayPoint is also able to provide CashOut services for its clients, allowing them to easily send payments back to consumers.

PayPoint also offers clients, through its MultiPay product, streamlined consumer payment processing and transaction routing in one seamlessly integrated solution for digital payments. This gives customers the flexibility to pay in the way that best suits them; including direct debit, mobile app, online, text, phone/ IVR and cash in-store.

#### *Retail services business.*

Using the same technology as the payments business, PayPoint provides retail outlets with services essential to running a modern convenience store. This includes a cloud-based EPoS solution with integrated card payment facilities allowing retailers to operate their stores in a modern and efficient manner. PayPoint also offers ATMs, SIMs and access to a parcel

pick-up and drop-off service (Collect+) which helps retailers generate additional footfall and increase their sales.

### **Our supply chains**

Our supply chains include:

Manufactured goods

Manufacturers and resellers of electronic point of sale equipment and automatic teller machines (ATMs)

Suppliers of telecommunication and information technology infrastructure equipment

Operational support service providers

Information technology service providers

Field engineering and technical courier services

Information technology consultancy services

Outsourced contact centre services

Outsourced fulfilment services

Business support service providers

Marketing and public relations consultancy services

Recruitment and talent search services

Accountancy, audit and legal advisers

Banking services

Building maintenance, office equipment, stationery supplies, janitorial and catering services

Retail suppliers

Multiple owned retailer groups

Symbol owned retailer groups

Independently owned retailers

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk:

Our supplier selection policy and process in appointing new suppliers mandates that new suppliers are contractually required to adhere to our code of conduct on modern slavery or provide evidence of the anti-slavery and human trafficking policies and processes which they have in place.

All contracts and agreements (including the terms and conditions attached to our purchase orders) entered into with new suppliers include provisions obliging compliance with applicable law (including the Modern Slavery Act). Non-compliance with this clause would be considered by us as a material breach of the contract or agreement, in the event of which appropriate action would be taken including termination of said contract or agreement.

We use only specific reputable employment agencies to source labour, and we always verify the practices of any new agency used before accepting workers from that agency.

We will review all instances of non-compliance of which we become aware, on a case-by-case basis and will implement appropriate remedial action.

## **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking, and we expect all those in our supply chain and contractors to comply with our values.

The Head of Compliance is responsible for ensuring compliance with the published anti-slavery policy and procedure. Suppliers are encouraged to report any suspected instances of non-compliance with our code of conduct on modern slavery or with the Act.

## **Training**

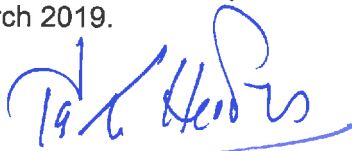
We provide annual training to all our employees via our PayPoint Learning Zone, which is tailored to ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

## **Our effectiveness in combating slavery and human trafficking**

Where permitted under our supplier contracts and agreements, we are able to carry out ad hoc supply chain audits by requesting for evidence of policies and processes in order to verify compliance with our requirements and expectations on modern slavery and human trafficking. Instances of non-compliance which become apparent following an audit of a supplier, will be assessed on a case-by-case basis and remedial action will be taken accordingly. We will only trade with those who comply with our expectations or those who are taking verifiable steps towards compliance.

Through our whistleblowing processes, all employees are encouraged to report any concerns related to the direct activities, or the supply chains of, PayPoint. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2019.



Chief Executive  
PayPoint plc  
Date: 25 July 2019