

## **Global Payments UK Limited**

### **Slavery and Human Trafficking Transparency Statement**

The Modern Slavery Act 2015 came into effect on 29 October 2015 and requires each company conducting business in the UK and having annual turnover of at least £36 million to provide information regarding the steps it has taken to prevent slavery and human trafficking from occurring within its business and supply chain. We fully support the aims of the Act, and this statement sets forth the steps we have taken to ensure that slavery, forced labour and human trafficking is eradicated from our business.

We make this statement with respect to our financial period ended 31 December 2021 and on behalf of our affiliate GPUK LLP.

#### **Our Business**

We are a UK-based subsidiary of Global Payments Inc., a leading worldwide provider of payment technology services delivering innovative solutions to customers globally. As part of a multinational corporation, we distribute our services across a variety of channels to merchants and partners throughout North America, Europe, the Asia-Pacific region and Brazil. We work with global suppliers across a number of different industries including businesses with operations in each of the geographic regions where we distribute our services.

#### **Our Principles**

We are committed to upholding the highest ethical standards in all of our corporate activities. In connection with this commitment, we have adopted an Employee Code of Conduct and Ethics. Our Code of Conduct sets out the internal policies which all of our employees are required to follow in the course of their employment and representation of the Company. All employees must understand and comply with the Code of Conduct, and we deliver annual training on the Code of Conduct to underscore the Company's commitment to conducting business with integrity and in an ethical manner.

## **Our Supply Chain**

In addition to conducting our business in accordance with our Code of Conduct, we strive to ensure that our supply chains do not contribute toward slavery, forced labour or human trafficking. We are committed to partnering only with suppliers who share our standards and our commitment to conducting business in an ethical manner, and we seek to identify suppliers who have taken steps to prevent slavery and human trafficking within their own businesses and supply chains. Following is a summary of some of the steps we have taken to ensure that our suppliers meet these standards.

*Vendor Risk Management Program.* We have developed a comprehensive Vendor Risk Management Program which governs our engagements with each of our vendors and suppliers across the Company. The Vendor Risk Management Program involves checkpoint reviews and assessments, prior to and throughout the course of our relationship with each supplier, to allow us to confirm that our suppliers conduct business in accordance with our expectations.

*Risk Assessment and Due Diligence.* Prior to entering into a relationship with a new supplier, we conduct due diligence activities to assess the risks of partnering with that supplier and to provide assurance that the supplier meets our expectations regarding adequate controls. As part of these due diligence exercises, we require that our most significant suppliers are compliant with applicable laws related to forced labour and human trafficking and that they have implemented appropriate controls to ensure forced labour and human trafficking do not occur within their businesses or their own supply chains.

*Worldwide Terms & Conditions.* Our contracts with our suppliers contain specific terms and conditions which require our suppliers to comply with all applicable laws and regulations in their provision of goods or services and to conduct their business in accordance with our standards and expectations. We reserve the right to terminate our contracts with suppliers for noncompliance with such laws, regulations and standards.

*Ongoing Monitoring.* We conduct ongoing monitoring of our suppliers to ensure that they are compliant with their contractual commitments and are delivering products or services in accordance with our standards. During this process, our most significant suppliers are required to renew their assurance of compliance with all applicable laws and regulations, including forced labour and human trafficking regulations. Suppliers which present heightened risks may be subject to additional audits or reviews, and suppliers found to be in non-compliance with contractual commitments are subject to penalties, up to and including termination

### **Recruitment & Health & Safety of team members**


To support our recruitment efforts we continue to apply rigorous Right to Work checks during the recruitment process to ensure vulnerable workers are not being exploited.

To support the health, safety and wellbeing of our team members during Covid we have clear guidelines and protocols in place. At the same time, ensuring we continue to monitor and adhere to local government advice and guidelines to help our team members stay safe and prevent the spread of Covid.

### **Training & Policy**

To maintain awareness of modern slavery and human trafficking across our business, we provide annual training to our staff and we also have an Anti-Slavery & Human Trafficking Policy in place.

This statement has been approved by the directors of Global Payments UK Limited.



Nick Corrigan  
President & Managing Director, Uk & Ireland

Date: 14/4/22