xpate

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 eradicate slavery, forced labour and human trafficking from our business.

We make this statement with respect to our financial period ended 31 December 2021.

xpate Business

We are a UK-based company, 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 the globe. 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.

xpate 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.

xpate 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.

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 expectations regarding adequate controls. As part of these due diligence exercises, we require that our 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. Suppliers which present heightened risks may be subject to additional audits or reviews.

Training

To maintain awareness of modern slavery and human trafficking across our business we provide annual training to our staff.

This statement has been approved by the directors of xpate Limited.