

2023.

Worldline's Vigilance Plan.



1. Preface.

As a global player in digital payments, this document aims to take on the responsibility to bring positive change to society in our specific field of play, digital payments.

Worldline consider delivering sustainable services a key element of our reputation as a trusted and secure partner, and also as a contribution, at our level, to a sustainable future for our planet.

Worldline's vigilance plan reflects the global vision of the company, ambitions about managing the company and also our promise to develop a sustainable business model and act responsibly towards all our stakeholders and wider society.

2. Introduction.

This document is Worldline SA's response to the requirements of the French law n° 2017-399 of 27 March 2017 relating to the duty of vigilance and other related laws and regulations, as well as to suppliers and subcontractors with which the Worldline group has an "established commercial relationship".

This document is also a way for Worldline to reaffirm its commitment to have a positive impact on Human Rights, Environment and Health & Safety.

This document is referred to throughout as our 'Plan'.

This Plan is the Worldline 2023 Vigilance Plan published by the Worldline group and is an updated version, of our previous Plan.

Our plan includes details on the following:

- A risk mapping aiming at identifying, analysing and classifying such risks.
- Procedures to regularly assess, in accordance with the risk mapping, the situation of subsidiaries, subcontractors or suppliers with whom the company maintains an established commercial relationship.
- Appropriate action to mitigate risks or prevent serious violations.
- An alert mechanism that collects reporting of existing or actual risks, developed in working partnership with the trade union organizations representatives of the company concerned; and
- A monitoring scheme to follow up on the measures implemented and assess their efficiency.

2.1 Our values.

This Duty of Vigilance Plan is in line with Worldline's strategy "TRUST 2025" and Worldline's values.

Our values and principles are our roadmap for conducting our business and for interacting with all our stakeholders being our clients, our investors, our partners and suppliers, our employees and our communities. Among those, sustainability is at the heart of Worldline's business model. The improvement in its Corporate Social Responsibility ("CSR") ratings and in its financial and extra-financial key performance indicators in recent years shows how seriously Worldline takes sustainability. Worldline aspires to be a premium brand in the payments industry for customers and for employees – another reason why it is so important for Worldline to promote sustainable values and share them with its stakeholders. Since 2017, the integration and formalization of Worldline's contribution to the United Nations' Sustainable Development Goals reinforced its commitment to excellence regarding sustainability.

Those values are also embedded in our 5-year CSR programme, the TRUST 2025 programme. By launching its TRUST 2025 transformation program, Worldline is confirming and accelerating the momentum in terms of CSR progress, performance and leadership around 5 pillars.

In relation to the application of the Duty of Vigilance, we will focus on the third pillar: 'ensuring business ethics including Human rights and rising up sustainable procurement practices within its value chain'.

Companies are increasingly confronted with ethical, compliance, Human rights and corruption challenges. In this regard, Worldline strives to endorse ethics and confidence in all its activities. Furthermore, as Worldline constitutes an international company, all these issues shall also be examined within its value chain. In this regard, Worldline adopted a Human rights policy (internally), and on a yearly basis publishes its Modern Slavery Statement.

These challenges require a strong ability to collaborate with suppliers and subcontractors so that these latter align and respect similar CSR values to rise up sustainable procurement practices within our value chain.

This is the context of Worldline's vigilance plan, a context in which, Worldline tends to be exemplary in terms of respect for human rights, the environment and health and safety, both within its entities and in its value chain.

3. Worldline in a nutshell.

Who we are:

Worldline is a global leader in the payments industry and the technology partner of choice for merchants, banks and acquirers. Worldline is at the forefront of the digital revolution that is shaping new ways of paying, living, doing business and building relationships.

What we offer:

Our solutions ensure secure payments and trusted transactional services along the entire payments value chain, enabling sustainable economic growth. Services offered by Worldline include instore and online commercial acquiring, highly secure payment transaction processing and numerous digital services. Our continuously growing portfolio of solutions is environmentally friendly and supports trust and social transformation.

Our vision:

Worldline's vision is to enable sustainable economic growth and reinforce trust and security in our societies. Our global business lines work together to drive transformation across the payments landscape to create sustainable value for our clients, employees, investors and for all our stakeholders.

Key figures:

18000+

Experts.

40+

Countries
implantation.

170+

Commercial presence
in countries.

4. Governance.

The law on the duty of vigilance reflects a desire for greater transparency both on the activities of an entity and on its value chain. This implies, on the one hand, an in-depth knowledge of environmental, human rights and health and safety risks and, on the other hand, the necessary involvement of risk management and procurement.

Therefore, in order to get a qualitative output a multi-disciplinary team was assembled on. In order to carry out and maintain the development of its Vigilance Plan, Worldline has set up a dedicated governance being organised as follow:

An Operational Committee with risk management, compliance, procurement and CSR representatives and a Steering Committee with leaders of the corresponding departments.

The committees meet regularly in order to perform the following tasks:

- Analysis of the legal requirements.
- Gap analysis.
- Risk mapping.
- Action plans.

The Operational Committee is also in charge of monitoring the implementation of the action plans described in this document (section 6) and updating the risk map accordingly. Other functions (e.g., human resources, procurement, CSR, etc.) may also be involved regarding the deployment of the required action plans.

The Steering Committee is there to approve each strategic step and decision.

In 2023, the Internal Control and the Physical Security & Safety departments have joined the Operational Committee to ensure a better coverage/understanding of our risks.

A member of Worldline SA's Working Council is now part of the Steering Committee to bring their insights on the Plan.

5. Risk assessment.

As Worldline operates in a constantly evolving environment, the Group relies on a continuous process of identification and analysis of risks in order to identify the ones that may have a material adverse effect on people and the environment.

The following chapter provides insights on the methodology used (5.1) and the results of the 2023 risk assessment (5.2).

5.1 Methodology.

The risk assessment methodology adopted to assess the impact of Worldline's activities on people and the environment is patterned in line with the Risk Management framework used within the Group. It consists in five main steps:

- Establishing the context to understand the scope, activities and main stakes of the assessment.
- Identifying the events and the risks that may have a material adverse effect.
- Assessing the risks in terms of impact and likelihood.
- Prioritising and defining action plans to mitigate the risks.
- Monitoring and reviewing the risk assessment and action plans on a regular basis.

The Risk Management framework as well as the risk assessment methodology are built on a Plan Do Check Act basis, i.e., a continuous improvement of the process. This allows risk processes to remain efficient and effective, as well as compliant with legal and regulatory requirements.

Assessment context and risk identification.

- With regards to the Duty of Vigilance law, the scope of the assessment covers the impacts that may result from
- The company's own activities.
- The activities of directly or indirectly controlled companies.
- The activities of subcontractors and suppliers with whom a commercial relationship is established (The "Key Partners").

The assessment covers all risks that may have impacts on Human Rights, Health & Safety and the Environment. To have a sound identification of the risks resulting from Worldline's activities in these three areas, the risk identification phase consists in workshops and interviews conducted with various stakeholders, among which Human Resources, CSR, Physical Security and Procurement internal teams, as well as benchmarking.

Risk area.	Specific risk.	Description.	Linked activities.
Human Rights.	Discrimination.	Discrimination in recruitment, promotion or remuneration.	Worldline and its Key Partners employ workforces in several countries. As such, discrimination is identified as a societal risk for Worldline. For example, employees may be exposed to discrimination in their career development.
	Sexual & workplace harassment.	Individuals being targeted for isolation, humiliation, aggression, sexual harassment and assault.	Employees at all levels may be exposed to harassment coming from peers or management.
	Discrimination towards indigenous people.	Risk for indigenous people to lose their residence, to have limited access to essential resources.	A few of Worldline's sites and its Key Partners are located in countries/ regions where indigenous populations may be exposed to discriminations.
	Freedom of association.	Individuals not being able to participate in union activities and to impact working conditions or negotiate compensation.	Worldline and its Key Partners operate in various countries that do not provide the same legal framework regarding social dialogue.

Risk area.	Specific risk.	Description.	Linked activities.
Human Rights.	Child labour & modern slavery.	Children exploited or suffering from a lack of education and health care. Workers exploited and denied their right to freedom.	Worldline and its Key Partners may employ workforces in illegal or improper conditions, or conduct activities where it is legal for children to work (children employment, undocumented workers...).
	Working conditions.	Individuals suffering from a lack of free time and family life as a result of extensive or forced overtime or being unfairly compensated.	Employees at all levels may be exposed to abusive working conditions (extensive overtime, inadequate compensation...).
Health & Safety.	Physical hazards.	Unsafe working conditions (ergonomic, noise, temperature) causing injury, illness or death.	Employees may be exposed to physical hazards in their activities within Worldline (notably in data centres) and across the value chain.
	Chemical hazards.	Unsafe exposure to chemical substances causing injury, illness or death.	Employees may be exposed to chemical hazards in their activities within Worldline (notably in data centres) and across the value chain.
	Psychosocial hazards.	Unsafe working conditions (design and management of work) causing injury, illness or death.	Employees at all levels may be exposed to coercive or stressful working conditions due to specific requirements in terms of availability of services within payment industry and the latest economic context.
	Workplace hazards.	Unsafe working place (building safety, exposure to disasters...) causing injury, illness or death.	Employees may be exposed to hazards related to the safety of their workplace (notably in data centres but also in off-site locations e.g., homeworking) and across the value chain.
Environment.	Waste management.	Waste pollution impacting human health, environment and resources.	Worldline's and its Key Partners produce waste (notably IT assets) that may cause pollution if not handled appropriately.
	Climate change and Green House Gases emissions.	Green House Gases emissions impacting human health, environment and resources.	Worldline's and its Key Partners generate Green House Gases (notably through data centres power consumption) that may impact the environment.
	Resources efficiency.	Overconsumption of resources (energy, water, raw materials).	Worldline's and its Key Partners consume resources (notably energy in data centres and raw materials for IT assets) that may impact resources' availability.
	Biodiversity.	Destruction of ecosystems.	Worldline's and its Key Partners may establish new site locations impacting local ecosystems.

Assessment scope.

The assessment scope is reviewed on yearly basis in order to reflect recent evolutions of Worldline and its partners, to monitor the effectiveness of mitigation actions implemented and to focus on areas of higher concerns.

In 2023, the scope of the assessment has been refined to cover:

On own operations:

- Assessment of new sites that have been integrated within Worldline group (6 countries and 15 new sites assessed).
- Reassessment of sites and countries presenting a high risk for either Human Rights, Health & Safety and/or Environment in 2022 (3 countries and 6 sites reassessed). All other sites are reassessed based on a 3-year roll-out.

On Key Partners:

- Onboarding of new partners and high-risk partners based on their industry and country (39 additional partners onboarded).
- Reassessment of partners presenting a high risk for either Human Rights, Health & Safety and/or Environment in 2022 (17 partners reassessed).

Risk assessment.

Risks are either qualitatively or quantitatively assessed considering their likelihood and their potential impacts if they do occur. The risk assessment is a shared work among all stakeholders and involves experts, internal teams and partners providing analysis based on their own experience through questionnaires and interviews.

The likelihood and impact of a risk are assessed on a 1-5 scale. The analysis is conducted on the residual risk, i.e., the risk remaining considering the actions that Worldline has already taken to alter the risk's likelihood or impact. Only already implemented actions are considered in that case.

- The likelihood is determined considering the mitigation measures already in place and the level of awareness on the risk area assessed. The data collected are also weighted based on several index among which the EcoVadis country score and the Environmental Performance Index.
- The impacts for Health & Safety and Environmental risks are determined based on the size and type of activities performed on the site assessed. The assessment is slightly different regarding Human Rights risks impacts. From Worldline perspective, the materialisation of a discrimination, for instance, would have the same level of impact no matter the size, type of activity or country where it occurs. Impacts for Human Rights risks are therefore determined ahead of the assessment.

Prioritisation and action plan definition.

Based on the likelihood and impact assessment, the criticality of each risk is evaluated on a 1-3 scale: Low – Medium – Major. The estimated level of each risk allows to determine whether a risk is acceptable in its current state or whether further actions are required. This enables decisions to be made about the nature and extent of further treatment required and about the priority to be given to the treatment of the risk. Considering the number of assessments performed on Worldline sites and Key Partners, risk assessments are consolidated (and weighted by headcount for Worldline sites) to highlight main areas of concerns and adjust risk treatments. Prioritization and action plans definition are also set up at a local level when the assessment reveals higher risk levels in certain sites or activities. Discussions are held with the appropriate stakeholders to define and implement mitigation actions when necessary.

Monitoring and review.

All risks identified are monitored and reviewed on a regular basis with the corresponding stakeholders according to their criticality and nature. It includes the follow-up of the progress of mitigation actions, the re-evaluation in terms of impact and likelihood and a re-prioritization if needed.

5.2 Results of the assessment.

The results of the 2023 risk assessments conducted on Worldline's activities and its Key Partners are presented below. This chapter focuses on the outcomes applicable to Worldline's entities (5.2.1) and to Key Partners (5.2.2).

Note on risk levels.

Risk levels are estimated based on the assessment of the impact and the likelihood of each risk. The method and heatmap used are such that a risk with significant impacts (e.g., most of Human Rights risks) will always be at least estimated as a Medium risk, no matter how low its likelihood may be.

Also note that the analysis is conducted on the residual risk. Actions that have already been implemented are considered in the assessment and described in section 6.

Compared to 2022 Vigilance Plan, risk maps presented below are also refined to gather risks of same impact and likelihood levels, in order to better reflect the results of the assessment.

Evolutions of each risk level compared to previous assessments are indicated by arrows on the risk maps. 2023 evolutions are resulting from:

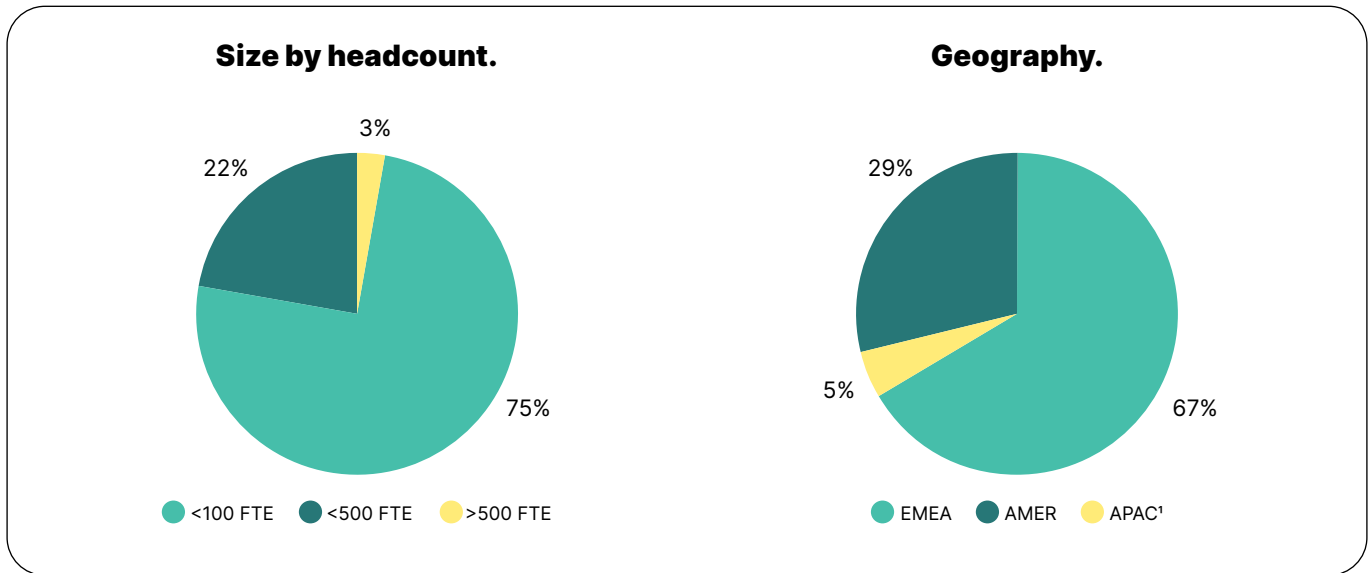
- Refined assessments: risk assessments performed in 2023 have slightly evolved based on last year assessment feedbacks. Questionnaires have been refined to bring more accurate data to qualitative and quantitative assessments.
- Improved data quality: information on Worldline sites characteristics (headcount, activities...) have been enhanced to bring more accuracy in the assessments and consolidation methods (headcount weighting).
- Extended scope coverage: the onboarding of new sites and Key Partners in 2023 assessments allows to enhance the risk assessment data base and provide a more accurate picture on the consolidated risk maps.

Therefore, evolutions presented in the risk maps below tend to bring a view on the adjustments and enhancements included in the 2023 risk assessments, on top of the evolutions of the level of risk compared to 2022.

It is also important to note the discrepancies in the assessment accuracy between Worldline’s own operations and its Key Partners’, as data collection comes with various challenges when relying on external sources. While the assessment on Worldline entities offers a more precise view on the level of each risk, actions are engaged with partners to enhance information sharing and transparency across the value chain and enrich the assessments.

5.2.1 Worldline’s entities.

Risk assessments on Worldline’s entities have been conducted on 129 sites in 35 countries, taking into consideration all types of activities performed within the Group (offices and data centres activities) and covering 86% of the full scope.

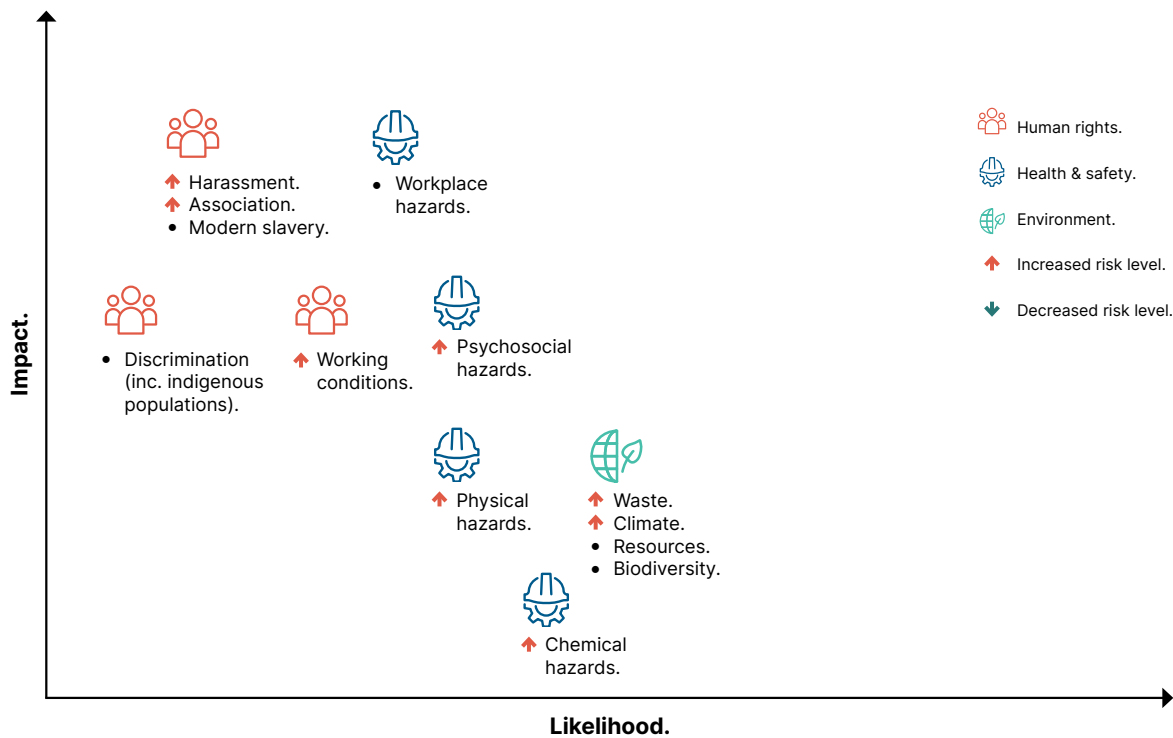


Risk assessments on Worldline’s entities have been conducted on 129 sites in 35 countries, taking into consideration all types of activities performed within the Group (offices and data centres activities) and covering 86% of the full scope.

The risk levels indicated in the map below are a consolidated vision of the assessments conducted in sites and countries within Worldline Group and its affiliated entities.

*EMEA stands for Europe Middle East & Africa, AMER stands for North, Central, and South America, APAC stands for Asia-Pacific

Risk map – Worldline's entities.



The main conclusions of these assessments are the following:

Regarding **Human Rights risks** the highest levels of risks are related **to harassment, freedom of association and modern slavery** risks, rated as **medium risks**. Considering the high level of impact of these risks, the minimal risk level is bound to be Medium. Yet, the intensity of the impacts if the risks do occur implies the need of a strong monitoring and the deployment of an efficient set of measures to be mitigated. It is also to be noted that all sites assessed are not equal with regards to these risks and a closer attention is given on the most exposed ones, especially considering the discrepancies of the legal framework in each country assessed. 2023 assessment also reveals slight increases in likelihood for some Human Rights risks, notably due to the onboarding of Medium risk sites (e.g., India) where a lack of awareness on the alert system and on the implementation of adequate controls to mitigate these risks is observed.

Regarding **Health & Safety risks**, **psychosocial hazards** remain a point of attention and entail the enhancement of mitigation measures toward this risk on most exposed sites. This applies especially on Medium risk sites onboarded in the 2023 assessment (e.g., China), demonstrating lower maturity in the assessment of these risks and in the deployment of according mitigation measures (e.g., availability of psychosocial support for all employees). **Workplace hazards** also show a Medium risk level, which can be explained by the intensity of the impacts on Worldline's biggest sites if an incident were to occur (fire, natural disasters...). Although the risk level is bound to be Medium, this implies the enforcement of a close monitoring. **Physical and chemical hazards** present lower risk levels due to the type of activities performed on Worldline sites (mainly office work) and to the measures already in place, although 2023 assessment reveals a slight increase in likelihood due to the onboarding of Medium risk sites that lack a sound identification and assessment of associated risks.

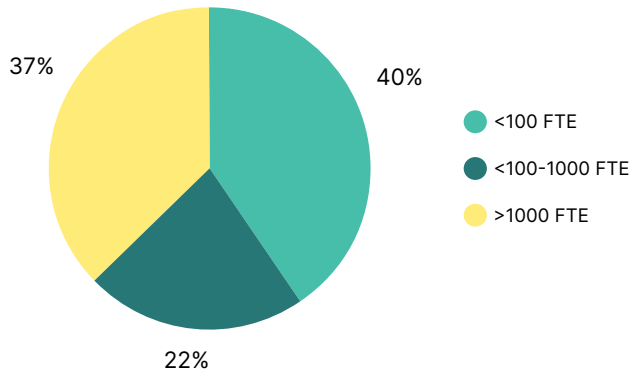
Regarding **Environmental risks**, **waste management** and **climate change** risks are handled through existing mitigating measures and a strong global awareness across Worldline sites. Nevertheless, a slight increase in likelihood is observed due to the expansion of Medium risk sites and enhanced data quality on sites' characteristics, impacting the overall weighted rating and requiring a closer monitoring. Attention still needs to be paid on **resource efficiency** (notably on energy consumption in data centres and in most exposed sites gathering a large number of collaborators), and on **biodiversity** impacts resulting from Worldline's presence in over 150 sites around the world.

While this consolidated view offers a high-level prioritisation in risk treatment, it is important to consider the differences observed from one site, region or activity to another to adjust mitigation plans. Deeper assessments and monitoring will therefore be performed in the APAC region where overall risk levels tend to increase due to cultural differences, recent onboardings and size of the entities. Activities performed within data centres are also of higher focus considering their hazard exposure and their resources consumption compared to office activities.

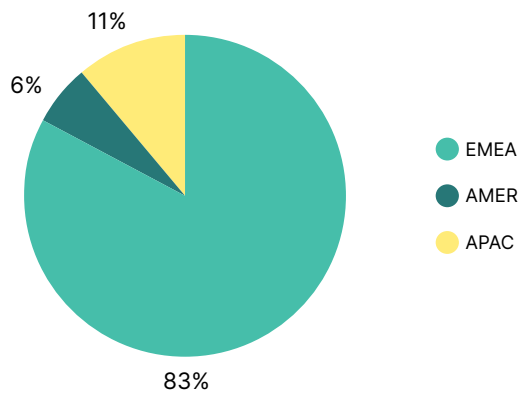
5.2.2 Worldline's Key Partners.

Risk assessments on Worldline's suppliers are conducted on a sample of 89 Key Partners, selected based on a high-level evaluation of the risks they may be exposed to, with regards to their type of activities and the countries they operate in as described in section 5.1. The profile of the selected partners is illustrated below, with a variety of company size, mostly located in the EMEA region and operating in IT. Compared to the 2022 assessment scope, this sample has been extended (+39 partners), gathering a larger number of partners above 1000 FTE (+7%), in the EMEA region (+5%) or operating in IT & Consulting (+7%).

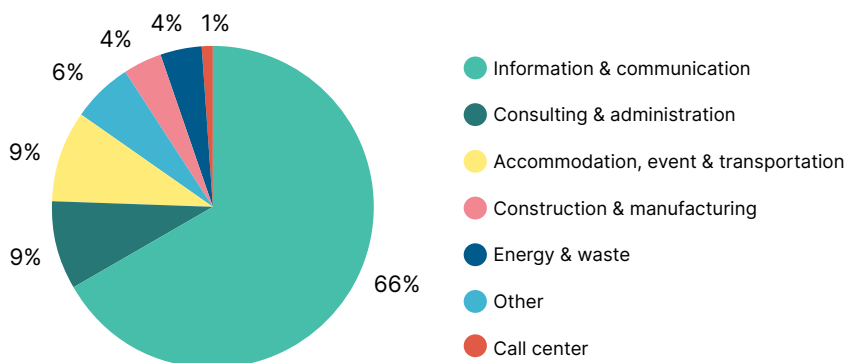
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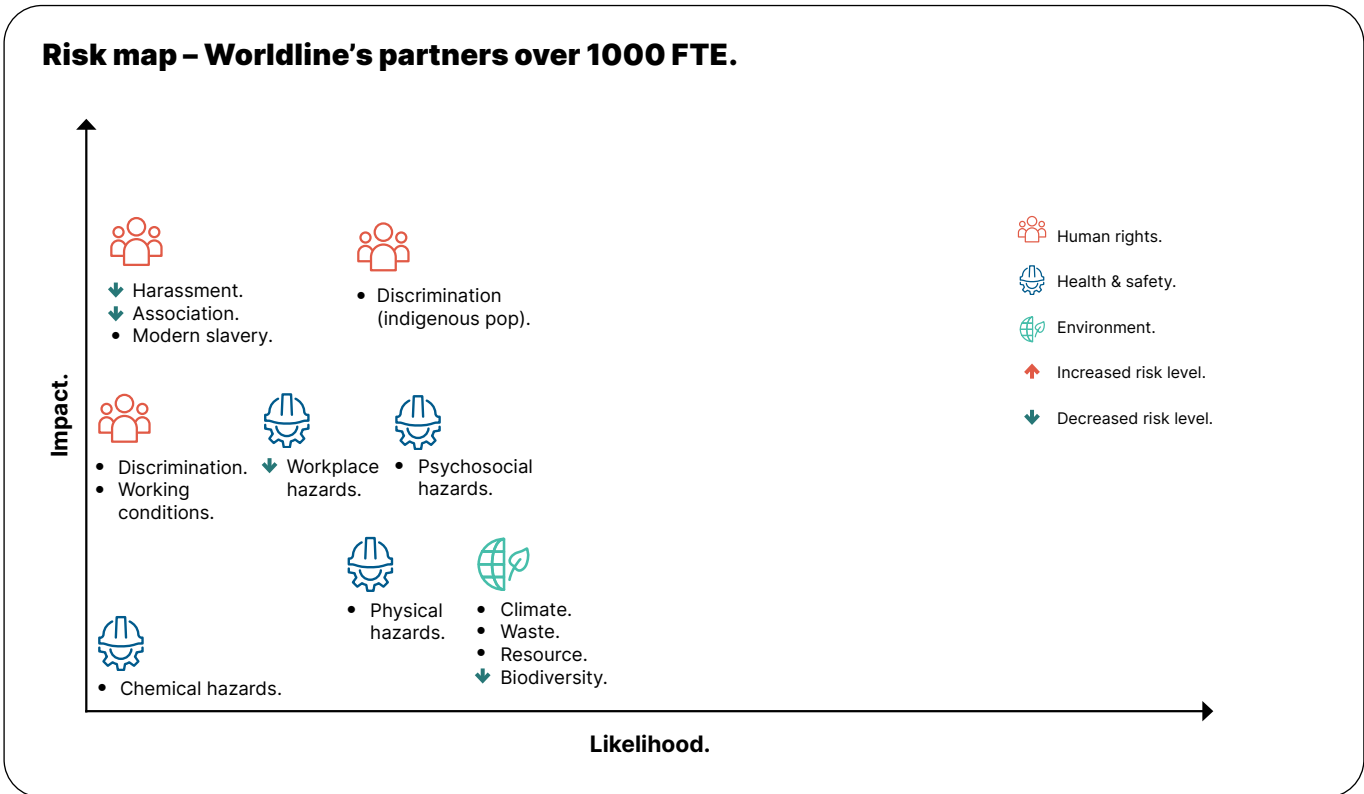
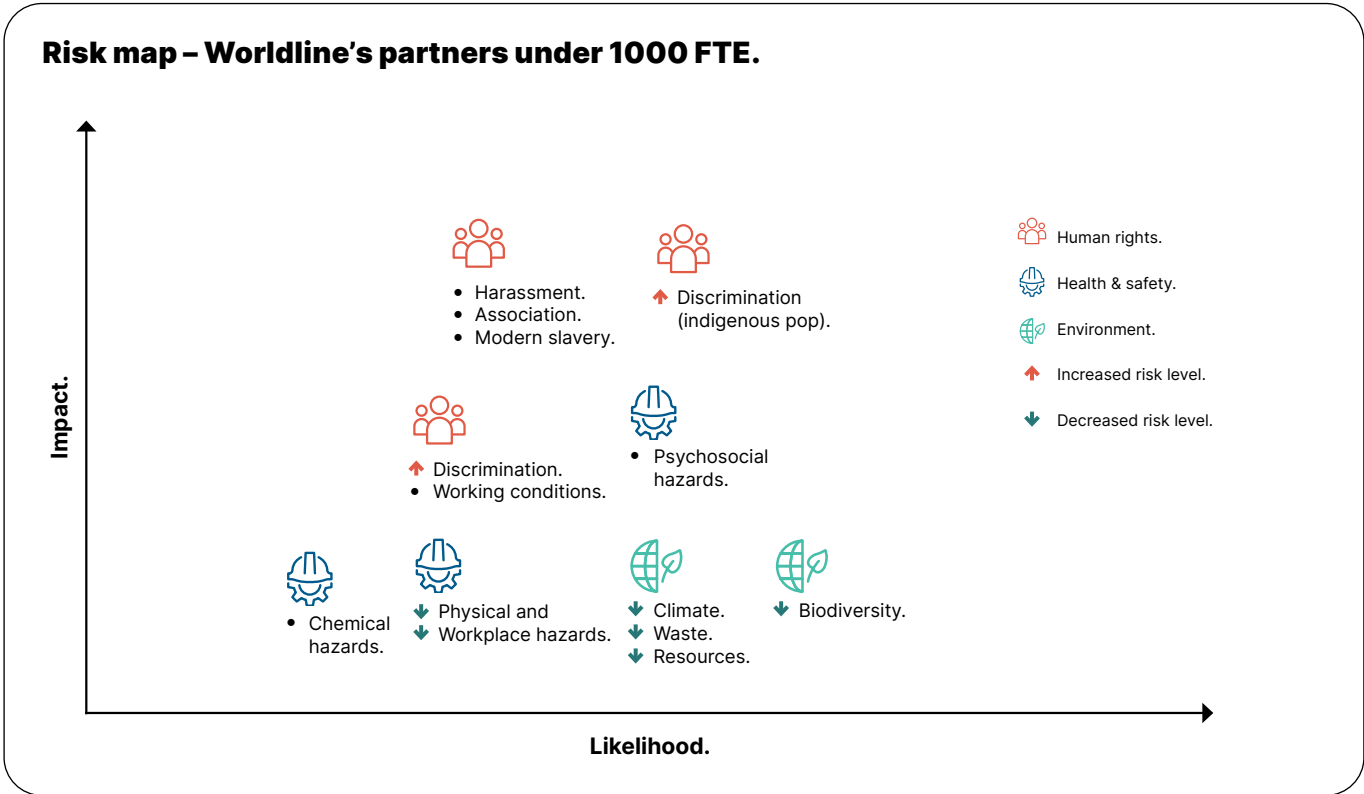
Geography.



Industry.



The risk levels indicated in the maps below are a consolidated vision of the assessments conducted with Key Partners. Results are displayed by Key Partners' size in order to reflect patterns identified in the consolidated results.



The main conclusions of these assessments are the following:

Regarding **Human Rights risks**, the assessment shows a clear contrast between smaller and larger companies, the latest showing a greater enforcement of mitigation measures and global awareness towards these risks, somehow improved compared to 2022 assessment. Keeping in mind that **harassment, freedom of association and modern slavery** risks are at least Medium risks by nature, the assessment highlights a point of attention for smaller companies with regards to these risks. Awareness regarding **discrimination towards indigenous people** also needs to be enhanced globally, although the direct interaction of our Key Partners with indigenous people could not be systematically assessed due to a lack of comprehensive data available on this topic.

Regarding **Health & Safety risks**, although **psychosocial hazards** are revealed to be best handled in larger companies, the assessment shows a point of attention on the overall level of awareness and the measures in place to mitigate this Medium risk. Physical, chemical and workplace hazards present a Low level of risk due to the profile of the partners assessed (mostly in IT & Consulting), although larger companies may face higher impacts of workplace hazards on most populated sites if an incident were to occur (fire, natural disasters...).

Regarding **Environmental risks**, the assessment highlights a clear distinction between smaller and larger companies, no matter the type of activity they perform. Larger companies tend to show higher level of awareness and mitigation measures in place, although facing higher level of potential impacts on the environment. A positive point to highlight is how biodiversity impacts appear to be more thoroughly addressed, as some reassessed partners presented improved mitigation measures in the 2023 assessment compared to last year. Consolidated results also display a decreased risk level for smaller partners overall, mainly due to the onboarding of small IT & consulting partners in the 2023 assessment, showing lower levels of impact on the environment.

While this consolidated view by partner's size allows to identify trends and areas of focus in mitigation plans, additional trends are being highlighted along with partner onboardings. Overall risk levels tend to increase in the APAC region (as for Worldline entities), and for some specific activities (environmental risks for partner's providing us with services related to Accommodation, Event & Transportation), that will be requiring higher attention.

6. Action plans.

Following the assessment of the risks, we will firstly analyse the actions plans applicable for Worldline's entities (6.1.1) in a first part to then, analyse the ones applicable for our Key Partners in a second part.

6.1.1 Action plans applicable for Worldline's entities.

In this section, actions plans will be described for each issue, being human rights (6.1.1.1); environment (6.1.1.2) and health and safety (6.1.1.3). A first part will be devoted to the actions already in place and a second one to the actions that aimed to be deployed.

6.1.1.1 Human rights.

1. Actions already taken.

a. Discrimination.

The issue of discrimination is addressed in various policies:

- [Code of Ethics](#).
- Worldline recruitment policy (internal policy).
- Worldline gender equity in recruitment policy (internal policy).
- Human rights policy (internal policy).

A specific focus has also been given to the absence of discrimination between men and women in the application of the [French Equality Index](#).

As a matter of fact, Worldline has voluntarily decided to expand the [French Equality Index methodology](#) and assessment, to measure compensation gaps in 14 countries, representing 80% of Worldline workforce.

This analysis relied on 5 indicators:

- Gender pays gap: how are women paid compared to men.
- Annual Salary increases are women's salaries increased as much as men.
- Promotion: are women promoted as much as men.
- Salary increases for employees back from parental leave.
- Diversity (W/M) in the Top 10% Highest remunerations.

The outcome of the 2021 analysis has been incorporated into both the 2022 salary review campaign and the Gender equity action plan to address the areas of potential improvement at Global, Global Business Lines and Country level.

In 2022 Worldline has also appointed a HR referent for Discrimination, Harassment and Violence whose role is to support the Compliance department to treat all the questions related to those issues.

b. Sexual & workplace harassment.

The risk of harassment (sexual or not) is addressed by the human rights policy. It states that Worldline shall not engage, support or allow any form of harassment, whether physical, verbal or psychological, or abuse in the workplace.

Regarding the process to report of such behaviours, please consult the [Worldline Universal Registration Document, section A.4.2.1.1](#).

While disciplinary measures could be necessary and legitimate, Worldline will never engage in or support the use of corporal punishment, physical or mental coercion, or verbal abuse.

c. Discrimination towards indigenous populations.

Currently, Worldline does not have specific mechanism aimed at ensuring the protection of indigenous populations as Worldline is relatively not present in countries where indigenous populations reside.

Where Worldline is present in a country where indigenous populations reside, it should be noted that the Worldline sites are not located in the same geographical area as these populations.

However, it will be made clear in our action plans that Worldline will put in place control mechanisms when opening new offices/sites to ensure that indigenous people are taken into account and not suffering from any kind of discrimination.

d. Freedom of association.

The subject on freedom of association is addressed by the human rights policy. The measures currently in place to promote social dialogue and to ensure the protection of freedom of association are described in [Worldline’s Universal Registration Document under section A.3.2.2](#) ‘encourage social dialogue to promote Human rights and high standards working conditions’.

e. Child labour & modern slavery.

This issue of child labour and modern slavery is addressed by the human rights policy and in our [Modern Slavery statement](#).

Worldline ensures that no child labour is used at any of Worldline’s facilities. Worldline entities must comply with the minimum age defined in the legislation of each country.

f. Working Conditions.

Worldline’s ambition is to be a Great Place to Work®. In order to continuously improve its wellbeing culture and monitor the progress, in addition to holding formal discussion with staff representative bodies, Worldline conducts with all its employees an annual and international satisfaction survey which is administered by the independent Great Place to Work® (GPTW) institute. This survey provides a detailed view of employees’ expectations and the areas for improvement that they would like to see the Company address. The survey is structured in five dimensions: credibility, respect, fairness, pride and camaraderie.

For more information, please consult [Worldline’s Universal Registration Document under the section A.3.2](#) ‘Foster employee well-being at work’.

2. Actions to be deployed.

Specific risk.	Risk level.	Action plans.
Discrimination.	●	Specific training on the topic.v
Sexual & workplace harassment.	●	<ul style="list-style-type: none"> Awareness actions focusing on work harassment. Specific training on the topic.
Discrimination towards indigenous people.	●	Ensure that before opening or buying a new site the presence of indigenous population nearby is taking into account through a formal questionnaire managed by the CSR team.
Freedom of association.	●	<ul style="list-style-type: none"> Facilitating countries in Europe to have a representative/election. Establishment of the SNG / European Committee.
Child labour & modern slavery.	●	<ul style="list-style-type: none"> Awareness around Group Policy _ Newsletter all Staff. Organization of the onsite audit process for suppliers to be able to easily trigger it when relevant.
Working conditions.	●	<ul style="list-style-type: none"> Continued deployment of actions already launched at Worldline.

● Low risk. ● Medium risk. ● Major risk.

In order to raise global awareness on the Human Rights risks a training will be prepares in 2024.

A specific local on Worldline alert mechanism and how to raise concern about those issues will also be deployed.

6.1.1.2 Environment.

1. Actions already in place.

a. Waste management.

ISO 14001 and waste tracking. As part of its ISO 14001 certification programme for all its sites with over 500 employees, Worldline aims to achieve high quality waste management. To achieve this, collective bins are available on each floor. Bins are specifically identified to indicate which kind of waste can be thrown in each bin. These bins are collected, and contents is recycled through proper channels.

Waste Electrical & Electronic Equipment (WEEE) – Worldline offices and data centers follow the legal obligations concerning the collection and processing of used or end-of-life WEEE. The waste is professionally disposed through certified channels. Worldline keeps the waste tracing slips.

In Worldline business context, WEEE includes IT servers, storage robots, network switch, computers (laptops and desktops), monitors, printers, ink cartridges, battery chargers, adapters and electrical appliances.

For more information, please refer to [Worldline's Universal Registration Document](#), section A.5.3.1 Reduce waste induced by our activities.

b. Climate change and GHG².

Worldline has designed and implemented since 2016 a low-carbon environmental strategy consistent with the international guidelines to align with the commitments developed at the Paris Climate Change Conference (COP21), thus factoring its stakeholder expectations, whether it be from its clients, the countries where it operates or civil society. Worldline's climate action plan is structured as follows:

- Worldline's carbon footprint.
- Worldline's carbon emission reduction targets.

The emissions reduction targets have been approved by the SBTi³. The objective is as follows: "Worldline SA commits to reduce absolute scopes 1 and 2 GHG emissions 25% by 2025 from a 2019 base year. Worldline SA also commits to reduce absolute scope 3 GHG emissions from purchased goods and services and use of sold products 7.4% within the same timeframe.". These targets have been updated in August 2023 and are currently under review by the SBTi.

- Mitigation plan - how to reduce Worldline's emissions.
 - In our own operations.
 - On our client side.
 - On our supplier's side.
- Worldline's net zero strategy

Being Net Zero by 2050 means that Worldline needs to reduce our CO2 emissions by -90% (scope 1+2+3.6- business travel) between 2019 and 2050. The 10% remaining emissions have to be sequestered. In 2019, the CO2 emissions related to the entire scope were 387 kt⁴ CO2 of which supplier emissions related to "Purchased goods and Services" represented 58% of the CO2 emissions. In 2050, the remaining emissions to be compensated will reach 39 Kt of CO2.

Worldline's approach to Net zero by 2050, aims to progressively move its CO2 emissions compensation scheme from credit purchasing to investment in environmental projects able to sequester all CO2 emissions. By 2025, it aims to sequester 100% of its direct emissions (scope 1+2+3.6) and start offsetting in 2026 the other categories of scope 3 to cover 100% of it by 2040. From 2040 to 2050, it will move these other categories of scope 3 from avoidance projects (renewable energy, forest preservation) to sequestration projects (tree plantation).

- Worldline's offsetting programme.

After reduction of consumption, the residual emissions are compensated. Worldline will concentrate its offsetting usage primarily and as much as possible on forest preservation certified initiatives. The Company will progressively move its chosen projects from avoidance to removal ones. This offsetting currently targets Worldline's operational activities (scopes 1, 2 and 3a). but we plan to progressively target scope 3b, while pursuing reduction initiatives.

²GHG stands for greenhouse gas.

³SBTi stand for Science Based Targets initiatives. Find more information [here](#).

⁴kt = kilotons.

Commitments.	2020 achievements.	Strategic programme.
Worldline SA commits to reduce absolute scopes 1 and 2 GHG emissions 25% by 2025 from a 2019 base year.	In 2022, Worldline's CO2e emissions have decreased by -48% compared to the 2019 baseline realigned to include the former Ingenico Merchant Services activities.	Worldline energy efficiency programme, renewable energy programme, building environmental improvement plan and sustainable mobility programme.
Certify ISO 14001 all its own strategic data centres and offices above 500 people.	Of the 18 targeted sites, 15 are certified. 2 non-targeted sites are certified.	All programs and initiatives relating to circular economy.
Obtain an average PUE (Power Usage Effectiveness) of 1.65 by 2020 for its own data centres.	The PUE of Worldline data centres is 1.65.	Worldline energy efficiency programme.
Supply 100% of Worldline Group electricity consumption with renewable energies.	The coverage of renewable energy has increased to 94% in 2022. Countries like Spain switched early 2022. Worldline is pursuing 100% renewable energy.	Worldline renewable energy programme.
Continue to offset 100% of the remaining CO2e emissions resulting from its own operations (data centres, offices and business travels).	100% of Worldline CO2e emissions resulting from its own operations (data centres, offices and business travels) are offset (refer to Worldline's Universal Registration Document Section A.5.2.3.3).	Worldline offsetting programme.

For more information, please refer to [Worldline's Universal Registration Document, A.5](#) Reducing our environmental footprint.

c. Resources efficiency.

• Energy.

Since 2013, Worldline has managed its five data centres in three different countries (e.g., France, Switzerland) with a dedicated energy efficiency programme. Over the years, many actions and best practices have been implemented in Worldline data centres such as cooling systems that use closed water circuits or the implementation of adiabatic cooling that avoid the sizing of the infrastructure for the hot peak days, allowing making substantial gains in energy savings. In this regard, Worldline is committed to follow the European Code of Conduct for Data Centres framework that was launched in 2008 and that aims at setting ambitious energy-efficiency standards for data centres. Besides, the Company strives to rationalise as much as possible its data centre's locations to optimise infrastructure efficiency. Worldline's data centre energy efficiency programme articulates around three pillars:

- Selecting the most energy-efficient servers and components.
- Optimising the use of its resources to save energy.
- Monitoring and checking the energy-effectiveness of its infrastructures.

Regarding Renewable Energy (REN), the company aims at switching 100% of its energy supplies to REN.

Early 2022, the Indian offices moved to local renewable energy contract. For offices, the Company will sign local renewable energy contracts, when available, or purchase renewable energy certificates (RECs). For data centres, all fully owned company data centres are covered by local renewable energy contracts. Going forward, the Company will reach 100% renewable energy for rented data centre space, either by having the supplier to sign a local renewable energy contract, or by purchasing renewable energy certificates (RECs). Doing so, the Company targets to reach 100% renewable energy coverage by 2025.

For more information, please refer to Worldline's Universal Registration Document, sections D.5.2.3.1 Worldline's energy efficiency programme and section D.5.2.3.2 Worldline's renewable energy programme.

• Sustainable IT.

At the Group level, different actions have been put in place to reduce the environmental impact of our corporate IT system. These aim to reduce the CO2 footprint on two dimensions: first of all, the environmental footprint of end-users and, secondly, of our use of service (e.g., Microsoft).

With regard to the first dimension, reduction actions are applied at three levels: (i) reducing the number of procured devices (Reduce smartphone allocation through the principle of bring your own device & eSIM, reduce number of screens for positions – single screen policy, enforce control to reduce convenience laptop change, consider virtual Data Center Workstations (DWS) to extend laptop duration...); (ii) reducing the manufacturing impact of procured devices (« Green » as key procurement criteria, add refurbished devices to catalogue) and (iii) reducing the impact of use (energy saving for laptops, chase « idle » consumption).

As to the second dimension, three actions can be highlighted. First of all, best practices as to the use of Teams have been shared amongst the employees; secondly other practices around Office 365 have been reviewed and, lastly, the environmental footprint is now a new procurement criteria for service renewal.

In order to ensure that these various actions are implemented, specific KPIs have been set up internally, such as the number of secondhand laptop and refurbished laptop or the number e-SIM provided. With the CO2 footprint corresponding to each of these figures, Worldline is thus able to quantify the savings of CO2e/ year (kg) made compared to new laptops for all for instance.

• **Water.**

The monitoring of water consumption is part of Worldline's responsibility in offices even if it does not have a high impact. Thus, the Worldline Facility Management team is permanently looking for investment to reduce water consumption in offices or canteens, and track any over-consumption to limit leaks, as well as anticipate repairs to be done to avoid leak occurrence.

The water used in data centre is mainly required for cooling servers. As water is used via a special close loop circuit, its consumption is not significant. Moreover, data centres are equipped to monitor water consumption and track any leak, which limits water overconsumption.

For more information, please refer to [Worldline's Universal Registration Document](#), section A.5.3.2.1 Water savings.

d. Biodiversity.

In 2022, Worldline has launched a biodiversity impact analysis. Several workshops have been conducted with biodiversity experts. This analysis requires additional developments to be carried out during 2024 in order to comply with the Corporate Sustainability Reporting Directive (CSRD) regulations.

2. Actions to be deployed.

Specific risk.	Risk level.	Action plans.
Waste management.	●	<ul style="list-style-type: none"> • Group actions. Ensuring that the waste management section of the environmental policy is in line with the CSRD Regulation ensuring that Worldline does also use a professional channel/recycling one to manage hazardous waste on other countries than France. • Local actions. India. Sorting at source and ensuring an eco-responsible recycling chain.
Climate change and Green House Gases emissions.	●	<ul style="list-style-type: none"> • Submit Worldline's long-term targets to the SBTi. • Implement the net zero strategy (including offsetting).
Resources efficiency.	●	<ul style="list-style-type: none"> • Global actions. <ul style="list-style-type: none"> • Introduce the possibility of using virtualisation to extend the lifespan of PCs. • Reduce the number of business mobile phones to a strict minimum by concentrating on dual SIMs. • To achieve a higher number of refurbished PCs than new PCs. • Local actions. <ul style="list-style-type: none"> • Reaching 100% low carbon energy source in the following countries for offices with more than 200 employees: India, Germany, the Netherlands, Argentina and US. • In the following countries/region for data centres: India, Iberia, Turkey, Latvia, Germany, Austria. They are all third parties.
Biodiversity.	●	Having a diagnosis of our impact on biodiversity.

● Low risk. ● Medium risk. ● Major risk.

6.1.1.3 Health and safety.

Our company is committed to achieve a safe working environment for all staff. This includes ensuring that adequate facilities, training and access to safety information are provided.

1. Actions already in place.

a. Physical, chemical & workplace hazards.

Information Security Management System.

Aside from the Psychosocial hazards, the risks of Health & Safety are covered by Worldline ISMS (Information Security Management System).

Our system refers to the international standard ISO/IEC27001 including its revision DIN EN ISO/IEC 27001:2017 and applies all entities where Worldline has more than 50% ownership.

The ISMS includes a set of process of policy such as the Physical Security and Safety Policy and aims to promote a security culture, reduce Worldline risks and strengthen the company defences, including but not limited to security issues, reliable power supplies, appropriate protection against intruders, and suitable emergency preparedness.

Yearly assessment of the risks.

Within Worldline, the Occupational Health and Safety (OHS) Committee and the Prevention and Protection at Work Committee (CPPT) work together to update a Unique Risk Assessment Document (DUER) for all Worldline's sites on an annual basis. This document includes a list of all the potential risks to which the employees may be exposed to while working, and the related preventive measures.

Training & Awareness.

Based on the results of the DUER, Worldline management publishes safety instructions for each site to inform employees of the proper behaviour to adopt on site with regard to potential risks.

Concerning Safety training, fire drills are organised yearly and volunteer employees at every site are entitled to receive paid basic first aid and occupational risks training.

b. Psychosocial hazards.

Health Prevention Initiative.

In main geographies, as a benefit, Worldline provides financial support to its employees on sport or fitness activities to help reducing stress. Some entities also offer an access to psychological help through dedicated hotline and/or platform.

Awareness.

Trainings on wellbeing are deployed within Worldline including training on relaxation techniques and stress management, good posture.

For further information on existing actions on Health & Safety risks please refer to section D.3.2.2.2 Measures to ensure health and safety at work of [Worldline Universal Registration Document](#).

2. Actions to be deployed.

Specific risk.	Risk level.	Action plans.
Physical hazards.	●	Campaign of 2nd level Control focused on physical hazards.
Chemical hazards.	●	Please refer to the actions already in place at Worldline.
Psychosocial hazards.	●	<ul style="list-style-type: none"> Extend psychological hotline/platform to more entities. Promote the inclusion of staff wellbeing into the objectives/appraisal review meetings.
Workplace hazards.	●	<ul style="list-style-type: none"> Campaign of 2nd level Control focused on workplace hazards. Training & awareness of Emergency teams (e.g., first aid training). Increase the number of fire emergency evacuation drill. Require fire safety certification from appropriate vendors in charge of ensuring safety and security on Worldline premises (e.g., in India).

● Low risk. ● Medium risk. ● Major risk.

6.1.2 Actions plans applicable for Worldline's suppliers.

Worldline's ambition is to further influence its sector and ecosystem in terms of ethical standards and CSR practices, notably its suppliers, in order to ensure utmost integrity and compliance with the Duty of Vigilance within its supply chain. To achieve that, the Company is firmly committed to develop tailored sustainable procurement practices thus reducing at the same time its technical, environmental, social and financial risks relating to its supply chain.

The following paragraphs focusing on action plans to mitigate supplier risks with respect to Human Rights, Health & Safety and Environment areas refer to section 4.2.2 Worldline's Key Partners in which the methodology and residual supplier risks identified have been further described.

After a first overview of the sustainable procurement strategy (6.1.2.1) the actions already in place (6.1.2.2) and the actions aimed to be deployed are described (6.1.2.3).

6.1.2.1 Sustainable procurement strategy.

1. Three pillars.

Worldline's sustainable procurement strategy, completely revised in 2020, is aligned with the framework and expectations described in the ISO 20400 norm and is based on three pillars:

- Ensuring proper due diligence through its risk assessment on suppliers.
- Promoting responsible purchasing practices.
- Encouraging its suppliers to raise ESG performance continuously.

Human Rights, Health & Safety and Environment areas are covered all together at every step of the relationship with the suppliers across these three pillars.

For more information, refer to [Worldline Universal Registration Document](#), Sustainable Procurement in Section D.

2. Supply chain monitoring scope.

Worldline's sustainable procurement strategy addresses Tier 1 suppliers with priority (suppliers paid directly by Worldline) and in an ad-hoc way, "Tier 1 bis" suppliers (suppliers with contractual relationship but not paid directly by Worldline) when it is more relevant.

3. Governance of supplier risks management.

The Sustainable Procurement governance is under the responsibility of Worldline Chief Procurement Officer and managed by a dedicated team in the procurement department. Action plans are reviewed and regularly monitored with the CSR Officer to ensure full alignment with stakeholders' expectations and Worldline TRUST2025 ambitions.

Supplier risks' assessment is performed through two complementary approaches:

- The supplier entity risks assessment related to the company, incorporating Human Rights, Health & Safety and Environment risks, as well as governance and anti-corruption risks. This assessment is managed by Procurement during the onboarding phase.
- The supplier engagement risks assessment related to the products & services bought, embedding business continuity, security, KYC and data protection risks. This assessment is handled by a dedicated Third-Party Risk team during the Purchase order/ contract phase.

4. TRUST2025 commitments.

In order to level up its ambition regarding its Sustainable Procurement strategy, Worldline has integrated two KPIs relating to the CSR performance of its suppliers into TRUST2025 programme to be achieved by 2025:

- 90% of strategic suppliers' expenses assessed by EcoVadis out of the strategic suppliers' expenses.
- 100% of suppliers evaluated by EcoVadis with a score below 45 having an action plan to solve critical findings.

Other KPIs are also closely monitored, such as: the percentage of strategic suppliers evaluated by EcoVadis, the percentage of spending on local suppliers, the percentage of buyers trained annually on sustainable procurement, or the representativeness of the strategic suppliers list out of the total spending. Other KPIs relating to vulnerable suppliers (i.e., Small-and-Medium Companies <1,000 employees) have been added in the monitoring in 2023 to more closely address and mitigate their size inherent ESG risks.

6.1.2.2 Action plans already implemented.

Human Rights, Health & Safety and Environment risks are addressed most often within the same action plans, hence the following presentation per type of actions implemented in alignment with the Sustainable Procurement strategy.

Sustainable Procurement Governance.

Worldline has a dedicated team within procurement department to design and ensure the implementation of the sustainable procurement strategy. A Sustainable Procurement Board gathering the Chief Procurement Officer and the CSR Officer is organised on a quarterly basis.

Supplier onboarding and entity risk assessment.

This phase is a mandatory prerequisite to be able to engage further with a supplier. This entity assessment is performed through the supplier onboarding process and is managed by a dedicated team. This due diligence process applicable to all suppliers entails different components:

- Extra-financial and financial screening out of worldwide databases.
- A vendor on-boarding questionnaire filled in by the vendor (including human rights, health & safety, and environment questions); and
- A mapping of the CSR inherent risks (by country and industry of the vendor).

Supplier contractual obligations.

Worldline shares its [Business Partner's Commitment to Integrity charter](#) with all its suppliers as soon as possible in the relationships and ensure the supplier agrees with the charter during the onboarding process. This charter is also included in the general Purchasing Terms & Conditions along with a dedicated CSR clause. This latter clause is to be added in any supplier customized contract with Worldline. During the onboarding, IT hardware related suppliers also receive the [Worldline's letter on the Responsible Minerals Initiative](#) (especially with regards to Human Rights and Modern Slavery stakes).

Responsible purchasing practices.

Any member of Worldline Procurement team has to sign a Code of Conduct to ensure the most ethical behavior towards suppliers. Also, mandatory training is provided to the procurement team to raise awareness on suppliers' compliance and performance with regards to human rights, health & safety, and environment, alongside with a specific anti-corruption mandatory training. Furthermore, the two documents' Guidelines for Sustainable Sourcing was updated and a new dedicated KPI on sustainable sourcing has been set up to foster the systematic integration of ESG criteria in the sourcing process by buyers.

Strategic suppliers⁵ CSR performance.

Thanks to a specific [EcoVadis platform](#), Worldline is able to monitor its strategic suppliers' CSR performance.

Indeed, Worldline asks its strategic suppliers to be rated by EcoVadis and triggers a Correction Action Plan for low performers (<45/100). In order to enhance awareness and level up CSR standard within its ecosystem, Worldline also organized a supplier CSR event in 2023 dedicated to strategic SME to further enhance their CSR performance and mitigate ESG risks.

Specifically for subcontractor suppliers, new training on Code of Ethics and Health & Safety are mandatory to complete for subcontractor employees working for and within Worldline entities.

6.1.2.3 Actions plans already in place and planned.

Risk area.	Specific risk.	Action plans.	
		Supplier FTE <1000.	Supplier FTE >1000.
Human Rights.	Discrimination.	●	●
	Sexual & workplace harassment.	●	●
	Discrimination towards indigenous people.	●	●
	Freedom of association.	●	●
	Child labour & modern slavery.	●	●
	Working conditions.	●	●
Health & Safety.	Physical hazards.	●	●
	Chemical hazards.	●	●
	Psychosocial hazards.	●	●
	Workplace hazards.	●	●
Environment.	Waste management.	●	●
	Climate change and Green House Gases emissions.	●	●
	Resources efficiency.	●	●
	Biodiversity.	●	●

● Low risk. ● Medium risk. ● Major risk.

⁵Strategic suppliers are defined as Strategic: long-term supplier parent company matching notably at least one of the following criteria: high total spend, substitutability stake.

Actions to be deployed or enhanced on all risk areas.

Sustainable Procurement Governance.

Set up a quarterly review of the TRUST & main KPIs based on the spending figures.

Supplier onboarding and entity risk assessment.

Implement a closer monitoring of suppliers assessed as high-risk during onboarding as agreed in the design phase.

Supplier contractual obligations.

Systematise the implementation of the CSR clause in all suppliers' contracts.

Responsible purchasing practices.

Increase the communication for sustainable sourcing to business owners in addition to buyers.

Strategic suppliers' CSR performance.

Enhance awareness for small vendors on Human Rights and Environment topics, especially for strategic vendors through the EcoVadis academy.

Specifically for environment risks.

- Plan a systematic recycling process with IT hardware providers (for DC, etc.) for end-of-life products.
- Enhance Worldline carbon footprint scope 3 methodology to better take into account real supplier emissions.
- Enhance communication on carbon emissions reductions to strategic suppliers.

Specifically for Human Rights and Health & Safety risks.

Broaden the "Worker voice surveys" initiative initially triggered for offshore subcontractor employees working in Worldline entities to collect satisfaction feedback from suppliers, and notably lower psychosocial hazard exposure.

On-site audits.

Plan and structure within Worldline the organization and the triggering criteria of an onsite audit for suppliers.

7. Alert system.

Worldline has a specific alert system in place: [The integrity Line \(EQS\)](#).

This mechanism allows Worldline's employees and all third parties to raise any concerns and allegations of violation of the Worldline Code of Ethics (or to any code of professional practice in some entities of Worldline) or of the local applicable laws and regulations, or wrongdoing.

As such, alleged infringement that can be reported through the Integrity Line includes violations of Human Rights, Environment, or Health & Safety.

The Integrity Line and the Worldline Global Compliance Alerts Policy – Whistleblowing ensures the reporters' confidentiality and protects them against retaliation or discrimination.

A description of the alert system and the Global Compliance Alerts Policy – Whistleblowing has been presented and/or approved by the different working councils when required by local laws and regulations.

All of the alerts received internally or externally have been fully investigated and acted upon.

Every year, the content and type of alerts received are used by the Compliance team to improve our measures to prevent the reoccurrence of the incidents reported.

In 2023, a total of 63 alerts has been received, and 54 of them have been deemed admissible.

21 admissible alerts were related to Human Rights violations, and more specifically to Discrimination and Harassment. The treatment of these alerts has been completed through the engagement and mediation of the Human Resources department and the Compliance department.

No alerts have been received on potential Health & Safety or Environmental infringement.

Other alerts received are related to Theft, Fraud, Misappropriation/Misuse of Assets, Money Laundering/Terrorism Financing, Miscellaneous behaviours, and Bribery, Corruption, Kickbacks, Negotiation in personal self-interest.

More information on our alert system and the alerts received can be found in [Worldline Universal Registration Document](#).

About Worldline.

Worldline [Euronext: WLN] helps businesses of all shapes and sizes to accelerate their growth journey – quickly, simply, and securely. With advanced payments technology, local expertise and solutions customised for hundreds of markets and industries, Worldline powers the growth of over one million businesses around the world. Worldline generated a 4.4 billion euros revenue in 2022.

Corporate purpose

Worldline's corporate purpose ("raison d'être") is to design and operate leading digital payment and transactional solutions that enable sustainable economic growth and reinforce trust and security in our societies. Worldline makes them environmentally friendly, widely accessible, and supports social transformation.

worldline.com



For further information

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