

Modern Slavery Statement 2024

Introduction

Conducting business in an ethical and sustainable way is part of Worldline's culture and this is incorporated into all facets of its strategy. Worldline can influence things for the better through not only its own business policies and practices, but also its relationships with employees, customers, partners, and suppliers.

We recognise that slavery in all its forms, including servitude, forced or compulsory labour and human trafficking ("modern slavery") continues to be a significant issue and we are fully supportive of efforts to eradicate these abhorrent crimes.

This statement has been published as a joint statement in accordance with the UK Modern Slavery Act 2015 and the Australian Commonwealth Modern Slavery Act 2018 ("Modern Slavery Laws"). It sets out the steps that Worldline SA and its subsidiaries ("Worldline"), insofar as they fall within the scope of the Modern Slavery Laws, have taken during the year ending 31 December 2023 to ensure that slavery and human trafficking are not taking place in their supply chains and in any parts of their business.

Organisation structure and supply chains

Worldline

Worldline is a European leader in payments services operating in over 40 countries across the globe, and employs over 18,400 talented and dedicated people. The Group provides an extensive range of merchant acquiring, payment processing and business solutions to financial institutions, merchants, corporations, and government agencies.

Worldline S.A., the Worldline group's parent company, is a public limited company (Société Anonyme) under French law and is registered with the Registry of Commerce and Companies of Nanterre. The Company is governed by a Board of Directors. The Operational Executive Committee meets weekly, leads, and implements Worldline's overall strategy and business ambitions, and a number of other committees exist to direct specific areas from a group perspective, including the Social and Environmental Responsibility Committee.

Modern slavery is a topic which is of importance to different Global Functions, whose policies determine the actions required at both global and local or entity level. Legal and Compliance are responsible for ensuring that legal and ethical requirements are met, both within the organisation, and within any other contractual relationships, and Compliance would investigate any concerns raised about any abuse of human rights; Human Resources look after the interests of employees; Procurement manages the selection, and ongoing management of suppliers; and the Corporate Social Responsibility (CSR) team helps manage the company's CSR strategy. This cross-departmental approach ensures that risk of modern slavery is considered throughout the company and there are appropriate policies in place.

Worldline activities are organised around three Global Business Lines (GBLs), namely: Merchant Services, Financial Services, and Mobility & e-Transactional Services. Worldline provides modern payment solutions that help financial institutions meet their customers' needs; delivers complete digital journey for retailers and their customers and facilitates consumer engagement via seamless services on any device; offers a unique combination of payment processing on an industrial scale as well as innovative solutions for payment and card-related transactions.

Australia

In Australia, Worldline has both wholly owned subsidiaries and joint venture companies Worldline Australia Pty Ltd (known as ANZ Worldline Payment Solutions) operates as a merchant acquirer for businesses whose operations are carried out in Australia. It is a joint venture between ANZ Non-Bank Holdings Pty Ltd and Worldline SA and is part of Worldline's MS service line. Worldline Australia Pty Ltd has a wholly owned subsidiary, Worldline Payment Solutions Australia Pty Ltd, which is the entity that primarily engages with suppliers.

Separately, in Australia there is a wholly owned subsidiary of Worldline SA, Worldline Services Australia Pty Ltd, and is a platform provider to the Group. It has a wholly owned subsidiary, Bambora Online Pty Ltd. The registered office of each of Worldline Australia Pty Ltd, Worldline Payment Solutions Australia Pty Ltd, Worldline Services Australia Pty Ltd and Bambora Online Pty Ltd is Collins Square, Tower 4, Level 15, 727 Collins Street, Docklands, Victoria, Australia 3008. There are 379 employees across the four Australian Worldline entities.

UK

There are four legal entities registered in the UK, Worldline IT Services UK Ltd, Worldline Merchant Services UK Ltd, Worldline Retail Enterprise (UK) Ltd and Worldline E-Commerce Solutions (UK) Ltd with over 550 employees across the four entities. The services offered are across the GBs. Worldline is the leading supplier of rail operations systems to the train operating companies in the UK and our ticketing, validation and payment systems are used by many franchised railway routes in the UK. Worldline's diverse range of clients also include those in the hospitality and retail sectors.

Suppliers

Worldline's ambition is to influence its sector and ecosystem for the better by promoting best practice and helping to improve CSR standards and practices. To achieve that, Worldline has developed a global sustainable procurement strategy which is described in the [Worldline Sustainable Procurement Policy](#).

The selection and management of suppliers is led by the Group Procurement Function under the management of the Chief Procurement Officer. Procurement activities are managed at Group level when this is appropriate, e.g. with global suppliers, and managed regionally but coordinated by Group Procurement when needed. This centralised approach means that decisions about category strategies, procurement performance, supplier management, and sustainable procurement can be made in a consistent way across Worldline.

The majority of procurement costs are for items typically required by the IT services sector, that is, IT hardware and software, subcontracted services such as software development and maintenance and telecommunications services.

- The Group's main suppliers of IT hardware and software include suppliers such as IBM, Dell, Oracle, HPE (Hewlett Packard Enterprise) and SAP.
- The Group's business involves extensive data processing which requires bandwidth intensive telecommunications services, its main providers being Orange, Proximus, Colt and Verizon
- Delivery and installation of terminals also involves large logistics providers like Toll
- Other important categories of products and services include POS Terminals and their component parts. The Group sources its terminals from companies such as Ingenico, Castle, or Verifone.
- The Group is also a substantial consumer of printing and postal services, particularly in its eGovernment business sector (especially automated traffic and parking enforcement solutions) and bank processing activities.

Worldline categorises all suppliers (individual legal entities) into three categories based on annual spend.

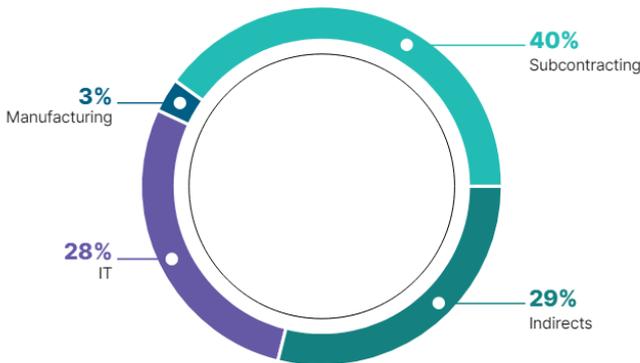
	Class A	Class B	Class C
Category description	Annual spend above or equal to 250k€	Annual spend between 25k€ =< X < 250k€	Annual spend below 25k€

The CSR assessment is usually conducted at parent company level. Any parent company which has at least one subsidiary in Class A (excluding any Class A supplier with whom Worldline has a one-off spend), is considered to be a strategic supplier. The spend associated with the strategic supplier consists of all consolidated spend with all subsidiaries.

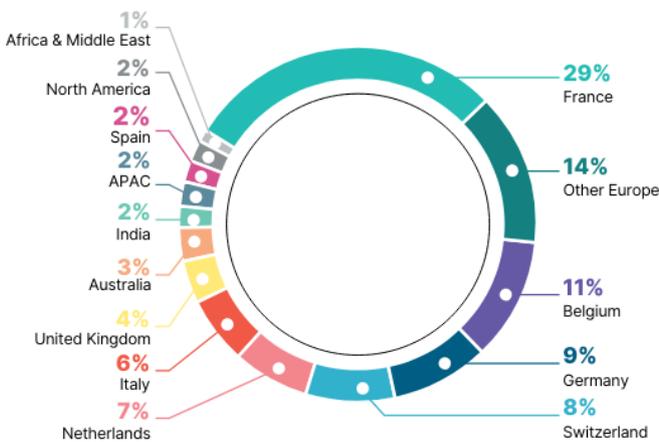
This supplier classification at parent company level is assigned during the vendor on-boarding phase and is reviewed on a quarterly basis. Procurement can then manage suppliers differently in terms of reviews or any other actions required, based on the status of supplier. Strategic suppliers are primarily Tier 1 suppliers, but in some cases, Worldline may also treat Tier 2 suppliers as strategic suppliers.

The graphs below present the breakdown of the total 2023 spend.

2023 spend breakdown by purchase category



2023 spend breakdown by supplier country



Policies in relation to slavery and human trafficking

Worldline Policies: Internal

Worldline's policies fall into two complementary areas – the Group policies which establish the minimum standards which must be observed throughout the Group, for instance any legal requirements that are applicable to all legal entities regardless of the country of operation, and local policies which reflect the needs of local legislation or operational needs. Worldline Group policies are developed by the relevant Global team through a process of writing, review, consultation with workers' councils where applicable, and each have a sponsor to ensure that the tone from the top is maintained and the involvement and commitment of senior management is visible.

Information about new and revised policies is shared in a variety of complementary ways. All employees must complete mandatory training, and this forms the basis of communication about core policies. This is supplemented by internal communications through the intranet, especially when there is an event such as the 75th anniversary of the Universal Declaration of Human Rights in 2023. This provided an opportunity to remind employees of our Human Rights Policy and some of our key commitments which our third parties must share, including a prohibition on the use of child labour, or forced or bonded labour.

Code of Ethics

At the heart of Worldline's culture, is the Code of Ethics. This forms not only part of the contract of employment but also is incorporated into contracts with agents and third parties. The purpose of the Code is to set out the basics: respect for people and human rights; compliance with both the letter and the spirit of the law; commitment to sustainability and social responsibility; and the absolute requirement that business, and human interactions, be carried out in an ethical way.

The Code of Ethics is available to employees in twelve languages including English, French and Spanish. It is also available in an English language version on the public website. Employees are informed about how the principles of the Code of Ethics can be applied to their working life through mandatory training which takes place each year, and through articles communicated within Worldline on the intranet.

Human Rights Policy

As a signatory to the UN's Global Compact, Worldline is committed to promoting human rights within the organisation and its supply chains. Worldline's Human Rights Policy, first published in 2021, is a clear statement of this commitment and some of the international conventions and declarations on human rights with which Worldline complies, one of the most important being the International Labour Organisation (ILO)'s Declaration on fundamental principles and rights at work. While the rights contained within it are, in many cases, and in many countries, legal rights, Worldline recognises the value in establishing a clear policy that serves to set the minimum standards that should be maintained throughout the organisation, regardless of what national employment or equality laws may be.

Worldline's Human Rights Policy is not dedicated solely to modern slavery but addresses many of the rights we take for granted in a fair and safe working environment. It prohibits the use of forced, bonded or compulsory labour; the use of child labour; and forcing employees to undertake overtime to which they have not consented, or to work more hours than is permitted by law. Employees have their rights to freedom of association, collective bargaining, and the right to strike, affirmed through this policy. The policy also mandates non-discrimination, promotes diversity and inclusion, and prohibits the use of harsh or degrading treatment, whether as an inappropriate form of discipline, or as harassment. The Human Rights Policy is available to employees via the Worldline Management System or can be found on the public website as the Human Rights Factsheet.

[Vigilance Plan](#)

In 2023 Worldline published its latest Vigilance Plan. As required by the French *Duty of Vigilance* law, Worldline identified and assessed the risks that may have an impact on human rights, the environment, and health and safety that may arise in Worldline or its supply chains.

The risks of child labour and modern slavery were assessed as part of this plan and action plans defined to mitigate the risk. Each risk identified is monitored and reviewed on a regular basis.

[Employment Policies](#)

While many employment policies are developed by local HR teams, there are Worldline policies which establish the expectations and needs of the group, including the Gender Recruitment Policy and the Pre-Employment Verification Policy. The latter states which documents must be checked; the Human Rights Policy, revised in 2023 (to be published in 2024) is more explicit: Worldline must not retain original documents as this can make workers more vulnerable.

[Sustainable Procurement Policy](#)

The Sustainable Procurement Policy, formalised and published in 2023, builds on the ethos, strategy, and existing policies within Worldline. Worldline's sustainably procurement strategy has three aims:

- To ensure due diligence through risk assessments of suppliers
- To promote responsible purchasing practices
- To encourage its suppliers to consider how they can improve their ESG (Environmental, Social and Governance) performance.

This strategy is aligned with the Guidance standard, ISO 20400 – Sustainable procurement.

[Business Partner's Commitment to Integrity Charter and Responsible Mineral Sourcing](#)

The Business Partner's Commitment to Integrity Charter forms part of the agreement between Worldline and our suppliers, subcontractors, partners and other third parties. This is a code of conduct for business partners and outlines the ethical standards expected by Worldline of its partners. It requires that they adhere to the principles of the charter in the following areas: human rights, business integrity, environmental management; that they will report any breaches; and that they acknowledge the right of Worldline to conduct on-site audits.

Worldline supports the Responsible Minerals Initiative and has a letter addressed to suppliers which outlines Worldline's commitment to the responsible sourcing of minerals, in particular, the avoidance of using metals which have been sourced in conflict regions. This letter is shared with relevant suppliers (and is referenced in the Business Partner's Commitment to Integrity Charter) and is available on Worldline's website.

[Suppliers' policies](#)

Suppliers may be asked to be assessed by EcoVadis, which includes consideration of their policies in key areas. This assessment forms part of the due diligence and supplier management process.

Whistleblowing

Worldline's Whistleblowing Policy (Compliance Alerts Policy) expands the principles of reporting breaches of policy or law as per the Code of Ethics and explains what can be reported and how; how reports are investigated; and it emphasises the protection of whistleblowers who make reports in good faith. Revised in 2023, the policy now introduces the local Whistleblowing Officer as a local contact, in addition to the other means of reporting possible breaches. One of the key avenues for reporting is the Worldline Integrity Line. This can be accessed freely via the internet and does not require any access to any Worldline systems. This is important because it exists not only for internal reporting by employees or contractors, but also for external parties such as suppliers and their employees. This means that concerns about the wellbeing not only of Worldline employees, but those working on behalf of suppliers, can be raised with Worldline as a supply chain issue.

Due diligence processes

Selecting new partners

Sustainability is an integral part of selecting new partners.

- For any purchase with a cost greater than 25k€, a Request for Proposal (RFP) is mandatory
- Integrate (in addition to the Business Partner's Commitment to Integrity charter) general CSR questions applicable to all kind of RFPs -these questions are scored so that the potential suppliers can be more easily compared on ESG performance/ CSR maturity.
- ESG performance must account for at least 10% of the weighting in the decision criteria
- Other ESG criteria must be considered where relevant to the specific purchasing category such as:
 - Sectorial ESG criteria: labels (e.g.: Energy Star®), refurbished materials, extended life duration, compliance with specific regulations or initiatives such as the EU (European Union) Green taxonomy) - see paragraph hereafter.
 - Strategic suppliers must provide information on CO2e emission for the product/service (per unit sold) offered as part of Worldline Net Zero commitment
 - Favouring companies classified as "sheltered workshops" (EA/ESAT status in France), in order to contribute to inclusivity of vulnerable populations.
 - Using, where possible, existing suppliers with whom we already have a Master Agreement to cover the full scope and which have local branches in the same country as the Worldline legal entity buying. The objective is to have a global/local approach to reduce our environmental footprint, when possible, as per the Global Reporting Initiative (GRI) to contribute positively to the economy and inclusion of territories.

Supplier onboarding and risk assessment

This phase is a mandatory step that must be completed before we can fully engage with a supplier to ensure that Worldline complies with all applicable legal requirements under the Duty of Vigilance, and anti-corruption laws. This assessment is performed through the supplier onboarding process and is managed by a dedicated team.

This due diligence process applicable to all suppliers consists of different components:

- Extra-financial, financial and sanctions screening using worldwide databases
- A risk assessment including:
 - vendor on-boarding questionnaire filled in by the vendor (including questions on the measures in place to prevent human rights violations)
 - A mapping of the CSR inherent risks (by country and industry of the vendor)
- EcoVadis assessment (strategic suppliers only)

Supplier risk mitigation measure

During the onboarding, Worldline shares its Business Partner's Commitment to Integrity Charter with all its suppliers and ensures the supplier agrees with the charter. This charter is also included in the general Purchasing Terms & Conditions along with a CSR clause including a part on human rights. This clause is to be added in any supplier customised contract with Worldline. The supplier is required to inform Worldline of any serious non-compliance with the principles of the Charter within one week of becoming aware of this, and within one month of reporting, it must have an appropriate action plan to remedy the issues resulting in non-compliance. The supplier must then agree with Worldline an acceptable timeline for its implementation.

During the onboarding, IT hardware related suppliers also receive Worldline's letter on the Responsible Minerals Initiative (relevant to human rights and modern slavery).

In order to enhance awareness and promote improvements to CSR standards within its ecosystem, Worldline also organised a supplier CSR event in 2023 dedicated to strategic SME to further enhance their CSR performance and mitigate ESG risks including the risk of modern slavery.

Modern slavery risks and risk management

Modern Slavery is the exploitation of individuals through forced labour, debt labour, human trafficking, child marriage and other forms of coercive labour practices and it exists in every country.

To identify modern slavery risks, Worldline assesses modern slavery risk as part of its human rights risks assessment. The scope of the assessment covers the impacts that may result from: Worldline's own activities, the activities of directly or indirectly controlled companies, and the activities of subcontractors and suppliers with whom a commercial relationship is established.

The human right risks assessment on Worldline entities are conducted on all sites and take into consideration all types of activities performed within the Group. The level of risk is not the same at all sites assessed and closer attention is given to those at highest risk, taking into consideration differences in the legal framework in place in the country in question.

Risk assessment methodology

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 risk assessment methodology adopted to assess the impact of Worldline's activities is formulated in line with the Risk Management framework used within the Group and consists of 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 likelihood and impact ('criticality') of a risk are assessed on a 1-5 scale, where 1 is low and 5 is major. 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.

Assessment context and risk identification

Modern Slavery, including child labour, has been identified as a medium risk within Worldline (low likelihood, high impact). This means that as the potential consequences are severe for any individual who is directly affected, there is a need for a strong and robust monitoring of this risk, and clearly defined and efficient measures must be in place to mitigate the risk.

Worldline as a technology service provider requires modern hardware and IT services to provide its services to customers. For modern day technology to operate it requires the harvesting or extracting of rare minerals, some of which may be located in jurisdictions where it is common for children to mine by hand. Additionally, outsourced IT services located in countries with a higher prevalence of modern slavery risk poses a higher risk.

When looking at the risk of modern slavery in our value chain, the assessment points out a clear contrast between smaller (fewer than 1000 full-time employees) and larger (more than 1000 full-time employees) companies. The assessment highlights that in terms of Worldline’s suppliers, the smaller the company, the higher the risk of modern slavery.

Managing risks

In addition to the measures already deployed within Worldline, to address the risk of modern slavery, our key actions in 2023 focused on:

- Reinforcing awareness
- Implementing closer monitoring

Key Actions	Within Worldline	Within our Supply Chain
Reinforcing Awareness	<ul style="list-style-type: none"> • Awareness around Group Policy Newsletter all Staff. • Create training on human rights with a part dedicated to modern slavery 	<ul style="list-style-type: none"> • Increase the communication for sustainable sourcing to business owners in addition to buyers. • Enhance awareness for small vendors on human rights topics, especially for strategic vendors through the EcoVadis academy.
Implementing closer monitoring	<ul style="list-style-type: none"> • Broaden the “Worker voice surveys” initiative initially triggered for offshore subcontractor employees working in Worldline entities to collect satisfaction feedback from suppliers. • Set up a quarterly review of the TRUST & main KPIs. 	<ul style="list-style-type: none"> • Organisation of the onsite audit process for suppliers to be able to easily trigger it when relevant. • Implement a closer monitoring of suppliers assessed as high-risk during onboarding as agreed in the design phase. • Set up a quarterly review of the TRUST and main KPIs.

Worldline encourages a 'speak up' culture and regularly promotes its alert system to the group and its value chain. As such, any alleged incident of modern slavery can be reported through the Integrity Line. In 2023, 21 admissible alerts were received that related to alleged infringements of human rights, and more specifically to discrimination and harassment. None of them were linked to modern slavery.

More information on our alert system and the alerts received can be found in Worldline Universal Registration Document, which is due to be published later this year.

Key performance indicators to measure effectiveness of steps being taken

Worldline's Trust 2025 programme has established KPIs across a range of topics so that there is a clear target to be achieved by 2025, which are monitored. The KPIs most relevant for modern slavery and human trafficking relate to sustainable procurement, and ethics and compliance. In addition to this, there are KPIs under the Sustainable Procurement Policy which are monitored.

As the EcoVadis assessment plays such a key role in our understanding of the adequacy of the policies of our suppliers in relation to CSR, it is important that we have assessments of our strategic suppliers. For this reason, by 2025, at least 90% of our spend with strategic suppliers, must be with strategic suppliers who have been assessed by EcoVadis. The average score of Worldline suppliers assessed is 61.3/100, which is above rating average of all companies assessed by EcoVadis globally. Worldline also requires that any supplier which has a score of less than 45, must have an action plan in place to address critical findings.

In line with the Sustainable Procurement Policy, additional things are monitored, including the percentage of spend with 'local' suppliers, i.e. where the purchasing entity and the supplier are in the same country; and the percentage of spend with strategic suppliers which are SMEs.

Worldline has not had any reports of known or suspected modern slavery in its supply chains. The ability to investigate all Compliance Alerts in line with stated procedures and in a timely manner, so that action plans may be defined where required and implemented as quickly as is feasible, is of the utmost importance. In 2022, 96% of alerts were investigated and action plans defined within 2 months, and in 2023, this had increased to 98%.

Topic	Indicator	2022	2023	Target 2025
 Sustainable procurement/ Ethics & Compliance	• % of suppliers evaluated by EcoVadis with a score below 45 having an action plan to solve critical findings identified	100%	100%	100%
	• % of total expenses assessed by EcoVadis out of strategic suppliers	86.7%	91.1%	90%
	• % of alerts investigated and related actions plan defined within 2 months	96%	98%	100%

The new Corporate Sustainability Reporting Directive, which applies to Worldline SA, has provided Worldline with an opportunity to consider additional topics and to plan how to incorporate them into the current approach.

Modern Slavery and Human Trafficking training

Worldline

All employees

Worldline's mandatory training programme consists of five modules which must be completed by new employees on joining, and by all other employees on an annual basis thereafter. At the heart of this is the Code of Ethics training designed to promote understanding of the Code of Ethics; provide a regular reminder; inform of any updates to the Code of Ethics; and to provide examples of how the principles can be applied in the employees' daily working life.

As the mandatory training must be completed each year, this gives Worldline the opportunity to revise or to choose a specific aspect to focus on. In 2023, the Code of Ethics training gave an overview of key topics including a section on Corporate Social Responsibility (environment and human rights), as well as reminding employees of the need to avoid corruption and bribery.

An additional anti-corruption course is mandatory for employees in exposed functions. This, too, must be completed each year. The rejection of corruption is one of the principles of the Global Compact and Worldline recognises the potential relationship between corruption and the abuse of human rights. In 2023, 97.4% of Worldline employees completed the annual mandatory training programme, which includes the Code of Ethics, and 93% of those required to do so (2091 employees) completed the anti-corruption training.

Buyers

Worldline recognises that the biggest area of risk of modern slavery is through our supply chains rather than through the direct or indirect employment of personnel working on behalf of Worldline. For this reason, and to support Worldline's sustainable procurement strategy and promote its ethical aims, online seminars on sustainable procurement are hosted at least twice a year. This training covers a range of CSR and Compliance (Ethics) topics, namely: compliance guidelines; changes to the regulatory landscape; new and updated processes; and internal materials used in the evaluation and onboarding of suppliers. While this does not focus exclusively on modern slavery and human trafficking, human rights are an integral part of CSR, especially when we consider our choice of business partners. In 2023, 68% of the procurement team members attended at least one training session.

Suppliers

The implementation of the sustainable procurement strategy requires closer co-operation with strategic suppliers. In 2023, Worldline Procurement team delivered a CSR training session for strategic SMEs to support their own CSR improvement plans and/or their own extra-financial ratings. Worldline has continued to conduct one-to-one interviews with specific suppliers on CSR topics, especially any with poor EcoVadis ratings so that we can better understand what they need so that they can make the necessary improvements and how we can support this.

Closing statement

Worldline is globally recognised as a sector leader for its Corporate Social Responsibility programme. We understand that slavery and human trafficking risks pose a threat to international firms as well as to the freedom, rights, and wellbeing of workers. Worldline embraces the challenges presented by the ever-changing global environment, continuing to adapt to the needs both of an increasingly complex legislative landscape and changing business needs. Worldline will continue to review the effectiveness of the measures in place to ensure that it acts responsibly and in the best interests of all who work with or for us, and to ensure that slavery and human trafficking does not take place within Worldline's supply chain nor any part of its business.

This statement was approved by the Board of Worldline SA on 13 June 2024 on its own behalf and on behalf of all of its subsidiaries coming within the scope of the Modern Slavery Laws. It has also been approved by, or will be presented for acknowledgment to, the boards of those subsidiaries that are registered in UK or Australia, namely Worldline IT Services UK Limited, Worldline Retail Enterprise (UK) Limited, Worldline E-Commerce Solutions (UK) Ltd., Worldline Merchant Services UK Limited and Worldline Australia Pty Ltd and Worldline Payment Solutions Australia Pty Ltd. For the purposes of the Modern Slavery Act 2018 (Cth), the relevant reporting entity is Worldline Australia Pty Ltd (ACN 645 073 034). Each entity to whom this statement applies has reviewed and contributed to it.

On June 13, 2024

Gilles GRAPINET

Chief Executive Officer