

## Modern Slavery and Human Trafficking Statement

### **Introduction**

*The Modern Slavery Act 2015 (the "Act") requires certain commercial organisations to set out the steps that they have taken during the previous financial year to ensure that modern slavery and human trafficking are not taking place within any part of their business or any part of their supply chains.*

*This Modern Slavery Statement ("Statement") is made pursuant to section 54 (1) of the Act and constitutes the statement for Euronet 360 Finance Limited ("e360" or "we" or "our" or "us") for the financial years 2020 and 2021. This Statement sets out the steps taken by e360 and the practices it has adopted to combat slavery and human trafficking in order to minimise the risks of such activities appearing within our sphere of operations. We remain committed to improving our practices, on an on-going basis, in this regard.*

### **Our Business**

*e360 is a private limited company incorporated in England & Wales with company registration number: 06928422 with its registered office at 7<sup>th</sup> Floor North Block, 55 Baker Street, London W1U 7EU.*

*e360 is an authorised electronic money institution, with FRN: 900009, duly regulated and supervised by the Financial Conduct Authority. e360 is also a principal member of the international card associations such as Visa, Mastercard and has similar arrangements in place with other card and payment networks such as American Express, Diners, JCB and UPI etc.*

*We provide, inter alia, merchant acquiring services in the United Kingdom, have issued electronic money and provide cash withdrawal services by virtue of our membership in the card schemes and payment networks on independently owned networks of automated teller machines ("ATM"). In several territories of the European Economic Area, we have registered branch offices of e360 and in the other territories we partner with separate legal entities who are either part of the Euronet Worldwide group of companies or independent third parties for the operation of ATM networks.*

*e360 is one of many separate legal entities forming part of the Euronet Worldwide group of companies and our ultimate parent company is Euronet Worldwide, Inc. a publicly traded entity on NASDAQ with ticker symbol EEFT. More information on the Euronet Worldwide group of companies can be found at: <https://ir.euronetworldwide.com/for-investors>. The Euronet Worldwide group has over 8000 employees worldwide and has its corporate headquarters in Kansas City, United States of America.*

*e360's supply chains are limited as it does not produce, manufacture or retail goods but rather focuses on providing payment and/or payment transaction processing services to financial institutions, retail businesses and consumers. Where we deploy ATMs on our own account we procure such hardware and ancillary equipment from leading global suppliers and we engage with other leading service providers for services including cash-in-transit services and equipment maintenance services.*

### **Our Policy and Approach**

*We are committed to ensuring that there is no modern slavery or human trafficking in our business and/or supply chains and we have a zero-tolerance approach in this respect.*

*In addition to the wider requirements on conducting business with integrity and in an ethical manner under the Euronet Worldwide group's Code of Business Conduct and Ethics Charter ("Code"), we expect all those involved in any part of the e360 business, including suppliers, to comply with our approach in order that we can reinforce that no modern slavery practices are taking place in any of our supply chains or in any part of our business.*

*e360 is supported by in-house legal and compliance functions who ensure compliance with all applicable laws and regulations. We have developed due diligence processes, as part of our regulated business lines, in order to on-board relevant third parties.*

### **Steps we take in our core business to address Modern Slavery**

e360 operates under a suite of internal policies that underpin its wider commitment to conduct its business ethically, transparently and to the highest professional standards.

The Code, in addition to e360's own set of policies and procedures, sets out a series of core values and applies to all employees at e360 and in the wider Euronet Worldwide group. It provides guidelines on the required standard of ethical conduct in various situations and specific policies govern the conduct of our business, including in relation to:

- anti-bribery and corruption which reinforces the standards of behaviour expected of our employees in their dealings with third parties together with our commitment to conducting business with the highest standards of integrity and ethics; and
- whistleblowing which aims to encourage employees to raise concerns, including about how they are treated or practices within our business or supply chains, without fear of reprisal.

In addition to the Code, e360, as a regulated entity, has a series of obligations on it and subsequently policies and procedures that govern its business operations including in the areas of:

- recruitment which aims at ensuring employees and/or staff members are adequately screened for eligibility to work purposes and background checks where required depending on the function and location whilst also ensuring all applicable employment laws (including any minimum wage requirements) are satisfied;
- AML & CTF which, e360, is required to implement measures in order to assist in combatting money laundering and counter terrorist financing activity; and
- business wide risk assessments meaning the wider aspects of how e360 conducts its overall business (e.g. with whom, from where and how) are under on-going review.

In addition to internal facing policies, e360 has adopted a consistent set of base terms and conditions for contracting with customers and suppliers which at a very basic level mandate compliance with all applicable laws and/or regulations failing which e360 has a series of remedial rights including the ability to terminate contractual relationships for material breach.

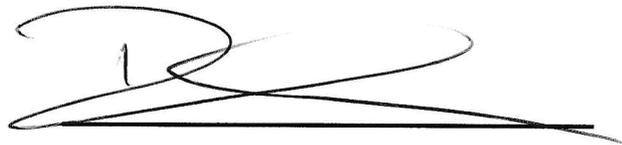
### **Our Future Plans**

e360 pledges to continue its commitment to combat human trafficking and modern slavery in any form. We will continue to work with our third parties to ensure that human trafficking and modern slavery does not occur in their business or supply chains. On-going measures will include:

- reviewing policies, procedures and terms of business relating to third parties and suppliers;
- training of employees on how to identify, prevent, and report potential signs of human trafficking and modern slavery; and
- reviewing our contractual processes to consider what, if any, amendments are required to reduce risks related to human trafficking and modern slavery.

### **Approval**

This statement was approved by the Board of Euronet 360 Finance Limited for publication on 26 February 2021.



**Daniel J Marland**  
**Director & Company Secretary**