

EPAY LIMITED

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 epay Limited ("epay" or "we" or "our" or "us") for the financial year ending 31st December 2025. This Statement sets out the steps taken by epay 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

epay is a private limited company incorporated in England & Wales with company registration number: 03695345 with its registered office at Kingfisher House, 2 Woodbrook Crescent, Billericay, CM12 0EQ.

epay is a market leader in the field of pre-paid goods and services where it enables a multitude of goods and services to be paid for up front. This is achieved via the distribution of a voucher code that is in the form of a gift card, paper receipt, or a digital code or via the application of credit to an account. epay distributes such products through its network of retailers who sell such products to consumers and through its corporate clients who wish to offer such products as loyalty or reward to its customers or employees. epay works across multiple industries including gaming, gifting, music, sports, leisure and telecommunications. epay provides the technology to its retailers and corporate clients to facilitate such distribution.

epay provides its services in the United Kingdom and in numerous territories globally, some of which it also has offices in as well as separate legal entities who are part of the Euronet Worldwide group of companies. epay's 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 approximately 10,000 employees worldwide and has its corporate headquarters in Kansas City, United States of America.

Our Supply Chains

epay's supply chains can be divided into four core categories which are as follows:

- Brand Partners - the ultimate owners of the products that are paid for upfront;

- Manufacturers – for the production of physical goods or materials needed to be able to provide pre-paid goods and services which include suppliers of physical gift cards, merchandising materials and IT hardware;
- Service Providers – for providing services that assist epay with the distribution and marketing of pre-paid goods and services, which include customer services, marketing and advertising services, logistics, IT & digital services;
- Business Support Providers – for providing goods and services for the general running of epay including office supplies, facilities management, recruitment, employee benefits and travel services.

Our Policies and Approach

epay is committed to ensuring that there is no modern slavery or human trafficking in its business and/or supply chains and it has a zero-tolerance approach in this respect.

epay operates under a suite of internal policies and procedures that underpin its wider commitment to conduct its business ethically, transparently, and to the highest professional standards. At its core, all epay employees must adhere to the Euronet Worldwide group’s Code of Business Conduct and Ethics Charter (“**Code**”), which has been formally adopted by the epay Board of Directors. This requires all those involved in any part of the epay business to act with fairness, integrity and honesty so that epay can reinforce its approach to ensure that there are no modern slavery practices in any part of its business.

epay’s own set of policies and procedures include:

- Modern Slavery Policy – which aims to make employees aware what constitutes modern slavery and puts obligations on employees to ensure that they do not procure labour or materials that have been sourced by means of slavery.
- Whistleblowing Policy - which aims to encourage employees to raise concerns through an anonymous reporting channel without fear of reprisal, if they become aware of improper practices within epay’s business or supply chains or if they feel they are being unfairly treated.
- Grievance policies - which allows employees to make formal complaints if they feel they are being harassed, victimised or discriminated against.
- Supplier Code of Conduct – which states the minimum ethical standards that Supplier’s adhere to.
- Supplier Onboarding Checks – which aims to ensure source of labour and source of material prior to onboarding new suppliers.
- Recruitment Processes - which aim at ensuring employees, staff members, and service providers are adequately screened for eligibility for work purposes and background checks where required depending on the function and location whilst

also ensuring all applicable employment laws (including any minimum wage and working hours requirements) are satisfied.

epay are supported by in-house legal functions who ensure compliance with all applicable laws and regulations. They have implemented various measures to reduce the risk of modern slavery and human trafficking within its supply chains which include:

- requiring suppliers to complete a questionnaire to determine source of labour and source of materials;
- categorising suppliers into high risk or low risk based on the category of goods and/or services being supplied and the location of where those goods and/or services are being provided;
- if a supplier is high risk, following up with further investigations and questions and where possible conducting an on-site audits; and
- ensuring suppliers to enter into written agreements with epay, which require them as a basic minimum to comply with all applicable laws and/or regulations failing which epay have a right to terminate the agreements for material breach.

epay ensures the effectiveness of these measures by keeping a spreadsheet that tracks for each supplier the following:

- whether it has completed a questionnaire;
- whether it has published a modern slavery statement;
- whether a supplier is categorised as low risk or high risk;
- where a supplier is a considered high risk, whether the origin of labour and materials are known;
- where a supplier is high risk, whether the supplier can demonstrate that its labour and materials are not sourced from modern slavery; and
- whether there are termination provisions in a supplier's contract that allow epay to terminate an agreement for breach of compliance with modern slavery laws.

Our Training

epay have implemented training programs for all its employees on relevant legislative requirements which impact its business. They regularly communicate its company policies through its intranet and provide specific training courses annually.

Our Future Plans

epay 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 epay Limited for publication on 26/02/2025

A handwritten signature in black ink, appearing to read 'N Stephenson', with a horizontal line drawn underneath the name.

Mr. Nigel Stephenson
Chairman of the Board of Directors