

## INGENICO, Group of Companies - MODERN SLAVERY STATEMENT 2022

### 1. Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) (together the "**Modern Slavery Legislation**"). It sets out the steps that Banks and Acquirers International Holding S.A.S. and its subsidiaries (collectively "**Ingenico**") have taken between 1<sup>st</sup> January 2022 and 31<sup>st</sup> December 2022 to ensure that modern slavery and human trafficking do not exist in their supply chains or in any parts of their businesses.

During the reporting period, all Ingenico entities were consulted and informed of the details of the Modern Slavery Legislation and the actions that shall be taken to address their requirements. The Ingenico entities were then actively involved in the preparation and writing of this statement.

We recognise that slavery in all of its forms, including servitude, forced or compulsory labour and human trafficking ("**Modern Slavery**") continues to be a serious issue and we are fully supportive of efforts to eradicate these abhorrent crimes. This statement sets out the steps that we have taken towards eliminating the risk of Modern Slavery taking place in our organisation and in our supply chain.

Ingenico was a listed company when it was acquired in 2020 to join Worldline, a European player in payment services. In 2022, Worldline announced the completion of its divestment of the Ingenico payment terminals business unit effective 30 September 2022 ("**Day One**").

### 2. Ingenico's structure and organisation

Ingenico helps businesses to navigate a new world of commerce, in which verticalization, expanded services, and digital players are transforming the payments landscape. Ingenico's mission is to be the ecosystem enabler and the most trusted technology partner in the new sustainable world of payments.

Founded in France in 1980 and now present in 37 countries worldwide, Ingenico is the global leader in payments acceptance solutions and the number one market leader in POS terminals, with 40 million terminals deployed around the world. The company currently employs 4,000 people internationally, with 110 offices established catering to at least 60 different country markets.

A major element of Ingenico's supply chain relates to the manufacturing of payment terminals, which is fully outsourced. This process is managed by Ingenico's France and China entities, and the payment terminals are then distributed to regional Ingenico entities. The assembly of the payment terminals is carried out by approved suppliers who have been thoroughly evaluated and are regularly audited. Upstream from this assembly chain, Ingenico works with a community of suppliers to produce its various components. These product manufacturing and assembly activities are predominantly carried out in Hong Kong, China, Taiwan, Vietnam, Thailand, Malaysia and Brazil. In 2022, Ingenico's product manufacturing programs were consolidated in the payment terminals business unit of Worldline prior to Day One. Established supply chain management and due diligence practices have remained since Day One.

Conducting business in an ethical and sustainable way is part of Ingenico's culture and strategy in all its spheres of influence - it is a "must have" that Ingenico has integrated into the company's thinking and processes. We truly believe that our responsibilities go beyond our own company, and we strive to embed our values in our relations with all our employees, customers, partners and across our supply chain.

Ingenico operated at Day One a Sustainability team in charge of resetting the Worldline Corporate Social Responsibility (CSR) programme and redesigning its own to focus on labour practices, with its main objectives being the management of the company's operations in a responsible and ethical manner and which integrates

social and environmental factors in the supply chain. In this respect we address social and human rights risks in our supply chain and possible issues of Modern Slavery.

The objectives once in the Worldline CSR programme were carried on with the same level of ambition once Ingenico separated.

In this regard, two specific Key Performance Indicators (KPIs) have been kept active:

- Strategic suppliers representing 90% of total supplier expenses assessed by EcoVadis.
- 100% of suppliers with an EcoVadis score below 45 having an action plan to solve critical findings identified.

### **3. Global Compact**

Ingenico's adherence to ethical working practices is demonstrated by its participation in the UN Global Compact since 2018. Each year, as a signatory to the Global Compact Ingenico has reported on the progress it has made in respecting and promoting the Global Compact's universal principles, including in relation to human rights and international labour standards. In 2021 and 2022, Ingenico was indirectly, under the participation of Worldline, a signatory of the Global Compact and will resume its membership in 2023.

### **4. Policies and procedures**

Ingenico is continually monitoring and reviewing its policies to ensure compliance to all known regulations.

#### **a. Code of Ethics**

Ingenico's Code of Ethics, last reviewed, updated and approved by the Ingenico CEO in 2022, has been part of every Ingenico employee's contract and is available in 10 languages.

Suppliers, partners and third parties who assist Ingenico in its business activities must also commit to respecting the principles of the Code. Additionally, all Ingenico employees must complete a mandatory e-learning module on the Code of Ethics, so that all employees are familiar with this key document.

In 2022 and within the Code of Ethics, Ingenico commits to ensuring compliance with international labour regulations and will only work with-business partners who are aligned with our values and ethical standards as expressed in our Code of Ethics. We expect our business partners to be in full compliance with all applicable laws.

The Code of Ethics emphasises the ethical standards and values Ingenico's employees and partners must abide by and includes a specific commitment relating to Modern Slavery:

*"Ingenico supports the global fight against modern slavery, and actively works to guard against modern slavery in any form within Ingenico and within our supply chains. Ingenico suppliers and business partners must ensure that they do not permit any form of modern slavery in their operations, including the use of child labour or forced, bonded or compulsory labour."*

#### **b. Whistleblowing Policy**

The Code of Ethics includes the right of any Ingenico employee or stakeholder to disclose behaviours or actions deemed inconsistent with the values and principles of the Code of Ethics.

Ingenico Whistleblowing Policy gives an overview on how Ingenico acts on reports of compliance breaches including the protection of the person raising the alert. In 2022, the policy was reviewed and updated, changing name from Compliance Alerts to Whistleblowing Policy and is aligned with the EU Whistleblowing Directive.

To support the Whistleblowing Policy, a Whistleblowing Portal is in place, in line with the requirements of data protection authorities by which employees may alert the company to any non-compliance with the Code of Ethics and any other issues of non-compliance via this anonymous online reporting tool, or through a dedicated email address. Line managers, the Head of Compliance, Risk and Internal Control, the Global Compliance Lead and Human Resources are also points of contact for any employee wishing to raise an alert. Through the Audit and Risk committee, the ExCom have visibility of these alerts.

The Whistleblowing Policy ensures that the rights of employees, and the sender or subject of the alert, are protected during the whistleblowing process. Accordingly, a person who raises the alert is assured of complete confidentiality in relation to the alert. The policy also states that the reporting employee shall not be subjected to any penalty or retaliatory measure, provided that the reporting employee acted in good faith and without the intention to cause harm, even if the events relating to the alert prove inaccurate or no action is subsequently taken. It includes the formalisation of the alerts handling processes and confirms the right of individuals to raise concerns anonymously in line for instance with the EU Whistleblowing Directive. The Whistleblowing Portal is also shared with Ingenico's suppliers and third parties who are encouraged to report any concerns.

### **c. Human Rights**

Ingenico is committed to respecting internationally recognised human rights in all of its business dealings. This commitment underpins Ingenico's employment practices and its relationships with customers, suppliers and partners.

Ingenico enshrines human rights' principles in its employment practices which are identified in the Human Rights Policy, which was reviewed in Nov 2022.

## **5. Supply chain standards**

According to the STRT template from the Social Responsibility Alliance, the goods sourced by Ingenico that may present modern slavery risks were Electronics, Batteries and Rubber from China, Malaysia, Philippines, and Vietnam. A strong focus has been made on all components manufacturers to exclude modern slavery risks. A two-fold approach was adopted: ESG performance assessment were requested from the suppliers and a global reporting on the origin of controversial substances, be it conflict minerals or Cobalt.

### **a. CSR Agreement and Business Partner's Commitment to Integrity Charter**

Ingenico engages its payment terminals components suppliers through "CSR Agreements" based on the Responsible Business Alliance (RBA) code of conduct. Prior to Day One, Ingenico, under Worldline, shared its values and commitments with its suppliers and partners through a bespoke document, the 'Business Partner's Commitment to Integrity Charter', which formed part of and is appended to all indirect supplier contracts and is available on Worldline's website. Both the CSR Agreements and the Integrity Charter summarise the principles with which all partners and suppliers are required to comply, and the actions that our suppliers are required to take, in order to be able to work with our company. Ingenico also encourages suppliers to comply with the principles of the United Nations Global Compact in the areas of human rights, labour, environmental preservation and anti-corruption.

The charter explicitly refers to Modern Slavery:

*"Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of individuals' liberty in order to exploit them for personal or commercial gain. Worldline expects its Business Partners to act ethically and with integrity in all their business dealings and relationships and to implement and enforce effective controls to ensure modern slavery is not practiced in their businesses and supply chains."*

## **b. Responsible Sourcing of Minerals**

In 2019, Ingenico performed a materiality risk assessment on its supply chain and the outcome showed that there was a risk that some of the hardware suppliers (for terminals components) could source minerals for components manufactured from conflict regions. Since, Ingenico has committed to ensuring that the smelters from which our suppliers buy the minerals are not likely to source from mines in conflict regions (in compliance with the Responsible Minerals Initiative – RMI).

In 2022, Ingenico established a process to collect and analyse all Conflict Minerals reports from the suppliers. The suppliers were requested to provide the smelters of origin of the conflict minerals included in their products. In case the supplier did not source from a conformant smelter, a corrective action plan was provided to either source from a different origin or work with the smelter to abide by the dictated rules of the RMI to become conformant.

Suppliers are sorted according to their smelter's risks and the strength of their conflict minerals programs. If suppliers present a high risk or expose a weak program, they are informed and several possible actions are recommended to improve their program. In this respect, the Company supports the efforts of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The TRUST programme included a KPI, demonstrating the percentage of concerned suppliers (sourcing minerals) that report on the origin of the source of their conflict minerals (3TG). In 2022 it concerned 75% of the suppliers. If the suppliers are sourcing from a non-compliant smelter (RMI classification), they are required to set up an action plan to correct this.

This KPI will be maintained in the Ingenico programme, and an upgraded target will be set.

## **6. Due Diligence and Audits in our Supply Chain**

Our suppliers have been classified with a level of risk and the high-level suppliers are strategic components suppliers related to the payment terminals manufacturing.

Supply chain due diligence describes the efforts taken to investigate a potential supplier and regularly assess existing suppliers. Its objective is to discover any corruption / ethical / human rights abuse / extra-financial risks associated with the potential or existing supplier in order to ensure integrity within the supply chain. Due diligence on suppliers is initiated from the on-boarding phase with a thorough screening (financial and non-financial) and checking that assesses supplier risks. EcoVadis evaluation, a third-party sustainability performance assessor, is triggered for strategic suppliers in order to more closely monitor their CSR performance.

In order to assess the CSR practices and mitigate the risks of our key suppliers (Strategic), we have implemented our own EcoVadis supply chain platform, inviting our key suppliers to be assessed by EcoVadis and share their scorecard in our platform.

In 2022, 119 different suppliers (at parent company level) were assessed by EcoVadis in the Ingenico platform, representing 46% of the Strategic suppliers. 100% of Ingenico's suppliers evaluated by EcoVadis with a score below 45 (51) had an action plan to solve critical findings identified.

## **7. Training and Awareness**

As ethics is one of the foundations of its business model, Worldline has established a mandatory annual training programme for all Ingenico employees, addressing topics such as the Code of Ethics. Following the acquisition of Ingenico, a specific deployment took place to train the extended workforce. This eLearning is updated regularly to reflect any significant changes to the Code.

In 2022, 75 % employees have been trained to the Code of Ethics in an E-learning format

## **8. Closing Statement**

Ingenico aims at becoming a recognized sector leader for its Corporate Social Responsibility programme. We understand that modern slavery and human trafficking risks may pose a threat to international firms and are constantly evolving in the current global environment. For this reason, each of the measures and policies described in this statement shall continue to be applied on an ongoing basis.

Ingenico (UK) Limited falls within the scope of the Modern Slavery Act 2015, the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 (the Act) and the main trading entity in Australia, Ingenico International (Pacific) Pty Limited falls within the scope of the Modern Slavery Act 2018 (Cth).

This statement constitutes Ingenico's modern slavery and human trafficking statement for the period between the 1<sup>st</sup> of January 2022 up to and including the 31<sup>st</sup> of December 2022 pursuant to the United Kingdom Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

This statement has been approved by the Supervisory Board ("Board") of Poseidon Holdco SAS, holding indirectly 100% of the shares of Banks and Acquirers International Holding S.A.S. as its principal governing body on 31 October 2023 and signed on behalf of the Board of Directors by Laurent Blanchard as the Chief Executive Officer of Poseidon Holdco SAS.

Laurent Blanchard CEO  
November 2023

A handwritten signature in black ink, appearing to be 'L. Blanchard', is written over a horizontal line. The signature is stylized and extends significantly to the left of the line.