

INGENICO, Group of Companies - MODERN SLAVERY STATEMENT 2025

1. Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth). It sets out the steps that Banks and Acquirers International Holding S.A.S. and its subsidiaries (including Ingenico (UK) Limited and Ingenico International (Pacific) Pty Ltd) (collectively “**Ingenico**”) have taken between 1st January 2025 and 31st December 2025 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 applicable Modern Slavery Legislation (the Modern Slavery Act 2015 (UK) for the United Kingdom and the Modern Slavery Act 2018 (Cth) for Australia) and the actions that shall be taken to address their requirements. They 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.

2. Ingenico’s structure and organisation

At Ingenico, we transform the commerce experience with our payment solutions, helping you open new possibilities.

We understand the world of commerce and take our responsibility for its future seriously.

At Ingenico, we are driven to be one step ahead by continually pushing the boundaries of what is possible. We’re delivering solutions for today while working with our partners to define those for tomorrow. We challenge our own thinking and empower our people to innovate with purpose – not just addressing the needs of our customers but doing so in a way that is mindful of the resources we use and the impact our solutions have.

We have been on this journey for over four decades, with partnerships and innovation at the heart of our approach.



Now present in 32 countries worldwide, Ingenico is the global leader in payments acceptance solutions and the market leader in POS terminals, with 40 million terminals deployed around the world. The company currently employs 3,000 people internationally, with 52 offices established catering to at least 120 countries where our solutions are deployed.

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 French and Chinese 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 the various components needed in its devices. These product manufacturing and assembly activities are predominantly carried out in Hong Kong, China, Taiwan, Vietnam, Thailand, Malaysia and Brazil.

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.

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.

4. Policies and procedures

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

a. Code of Ethics

Ingenico's Code of Ethics, last reviewed, updated in 2023, 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 2025 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 emphasizes 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. This whistleblowing line can be used by our suppliers and suppliers' employees to disclose unethical behaviour related to our activities.

Ingenico Whistleblowing Policy gives an overview on how Ingenico acts on reports of compliance breaches including the protection of the person raising the alert. The policy was reviewed and updated in 2022, 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. Whistleblowing cases are managed by the Group Compliance function, which shall escalate to the Executive Committee any matter warranting senior management attention. The Executive Committee is responsible for ensuring that appropriate measures are taken in response to such alerts and shall report to the Board of Directors, through the Audit and Risk Committee, on any material developments arising from the whistleblowing process.



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 formalization 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 recognized 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 last reviewed in November 2022.

5. Supply chain standards

a. Operation organization and supply chain mapping

The following describes some specificity of our operations organization:

- The products made by Ingenico are designed by the R&D and passed on to the operations for new product introduction
- The production is outsourced to some EMS (Electronic Manufacturing Systems) in Asia (Vietnam / Thailand / China) using Ingenico selected rank2 suppliers
- The EMS are duly audited and compliant to our quality / CSR standards
- The component suppliers and rank2 suppliers are duly selected and approved by Ingenico Operations
- The products are shipped to regional Ingenico warehouses
- The customization of our products is managed by Ingenico or by some partners duly selected and audited by Ingenico
- The repair of our terminals is managed either by Ingenico repair centres or by repair partners duly selected and audited by Ingenico



Ingenico's supply chain is complex and twofold:

- A chain of Asian suppliers that are related to the Direct Procurement, all procurement activities that relate directly to the production and transportation of produced goods. These partners are EMS, components and material suppliers to manufacture the terminals and carriers to deliver the products.
- A chain of international suppliers that serves non-manufacturing corporate operations or regional teams managed by the Indirect Procurement teams

b. Slavery and Trafficking Reporting

According to the STRT (Slavery and Trafficking Reporting Template) from the Social Responsibility Alliance, the goods sourced by Ingenico that may present modern slavery risks were Gold, Tin and Tungsten, Cobalt and Electronics from China, Colombia, Democratic Republic of Congo, Ghana, Indonesia, Malaysia, Peru, Philippines, Tanzania, Uganda, Zimbabwe

c. Perimeter of the Due diligence

The perimeter of the Due Diligence covers the group of companies of Ingenico and includes the Tier1 direct suppliers and the Tier2 components suppliers.

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 mandatory plan for corrective actions in case of low performance
- A global reporting on the origin of controversial substances, be it Conflict Minerals or Cobalt.

d. Due Diligence

Ingenico aims to do business only with Third Parties that operate ethically, sustainably, with integrity, and with high standards of regulatory compliance. Ingenico has adopted a risk-based approach to compliance due diligence to balance the compliance objectives with the risk to Ingenico represented by the Third Party. This approach includes among other criteria the screening, using publicly available data, to check for sanctions exposure, involvement of politically exposed persons (PEPs), law/regulatory enforcement action and other adverse information. Third parties are rated according to their inherent risk (Low Risk, Medium risk, High risk and Prohibited). Third Parties will be classified as Prohibited if they are registered or operating in an Unacceptable country, or if due diligence identifies any matter that is considered incompatible with Ingenico's values, standards and reputation. In this case, Ingenico may not enter a business relationship with the Third Party, and any existing relationship must be terminated.



Unacceptable countries are: Belarus, Cuba, Iran, Lybia, Myanmar, North Korea, Russia, Sudan, Syria, Venezuela, Crimea, Donetsk, Kherson, Luhansk, Zaporizhzhia (Regions of Ukraine).

e. CSR Agreement

Ingenico engages its payment terminals components suppliers through “CSR Agreements” based on the Responsible Business Alliance (RBA) code of conduct. The CSR Agreement defines the principles with which all partners and suppliers are required to comply, and the actions that our suppliers are required to take, 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.

f. Responsible Sourcing of Minerals

Since 2016, 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) and has participated in educating them in case of non-conformant smelters within their supply chain.

In 2025, Ingenico continued its partnership with Assent to collect, process 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. 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 requested to setup a corrective action plan to either source from a different origin or work with the smelter to abide by the dictated rules of the RMI to become conformant. 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.

In 2025, the tracked KPI, demonstrating the percentage of concerned suppliers (sourcing minerals) that report on the origin of the source of their conflict minerals (3TG) showed more than 82% of the suppliers participated. 32% (35/105) of the total suppliers had a Responsible Minerals Program Status at “Weak” and were required to set up an action plan to correct this.

This KPI Target had been set to 80% and has been successfully achieved.



6. Audits and performance assessment in our Supply Chain

a. High risk suppliers for direct procurement

A Risk assessment, updated in 2023, showed that Tier1 partners (EMS and Repair vendors) bear the most risk hence are under scrutiny.

- Ingenico is partnering with three EMS (Electronics Manufacturing Services) suppliers to manufacture and assemble the payment Terminals.

An ESG-assessment plan spanning 2024 and 2025 has been setup to audit these EMS. The audits for Vietnam and Thailand took place in March 2024 and the third audit took place in September 2025 in the Chinese manufacturing site. These audits come on top of the regular self-assessment these suppliers have regarding ESG matters following their commitment to the code of conduct of the RBA.

The findings during these audits were that the alignment with the RBA code of conducts was very good, the policy and controls in place were defined to ensure the employment of only adults, and anti-harassment & abuse policy had been in place since 2008.

- On top of the manufacturing services, Ingenico also partners with repair centres.

An ESG Audit plan has been setup to cover the large repair centres in 2025 and 2026. The repair centres in Poland and in Spain have been audited in May and September 2025.

Regarding the sustainability performance assessment, two specific Key Performance Indicators (KPIs) have been kept active from the previous years:

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

Following an internal ranking process called FERMS, our suppliers are regularly classified with a level of risk leading to the list of *strategic* components suppliers (Tier2) 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 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 to more closely monitor their CSR performance.

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

In 2025, 133 different suppliers (at parent company level) were assessed by EcoVadis in the Ingenico platform, representing 63% of the Strategic suppliers. 29 of them are signatories to the Global Compact. 113 have an ISO45001 certification.

100% of Ingenico's suppliers evaluated by EcoVadis with a score below 45 (50 of them) had an action plan to solve critical findings identified.

The target for 2025 was to reach 60% of coverage and 100% of low performers assigned a CAP.

b. Indirect procurement vendors

Ingenico is using more than 3000 indirect vendors. We have chosen to focus on the ones that represent the most important part of our portfolio in terms of spending bearing the most risk.

Similarly to the direct procurement assessment of vendors, we are requiring from the top suppliers representing 80% of our spending, to be assessed by Ecovadis, to perform at a high level.

In 2025, out of 166 suppliers, 43% of our suppliers were assessed and 10 were assigned corrective action plans.

The target was not set for 2025 since it was an introduction year, and for 2026 will be to reach 60% of coverage and 100% of low performers assigned a CAP.

In 2026, a risk approach will be set in place for the indirect procurement to focus on high risk suppliers also in the indirect procurement portfolio.

c. Ingenico's performance expectations

The query that Ingenico sends to all strategic suppliers, whether Direct or Indirect is that their EcoVadis assessment results is not below the score of 45/100 and not to have any specific pillar (Environment, Social, Ethics and Sustainable procurement) of



the assessment below 40/100. In case of a scorecard below the expected threshold, Ingenico request a corrective action plan by the supplier.

d. Corrective action plans

In case non-conformities are identified during the audits or the CSR assessment, immediate corrective action plans (CAP) are required from the partners.

In the case of an audit, the report is disclosed to the partner and internal stakeholders, and a CAP is mutually validated to cover the non-conformities, and to include some of the proposed improvements that are suggested by the auditors.

In the case of a CSR assessment, the scorecard is reviewed and low performers are suggested corrective actions to implement, through the assessment platform, that will be evaluated before the next assessment. The EcoVadis platform is reviewing the improvement plan success prior to the next assessment.

Example of action plan:

- Disclose the corruption risks assessments
- Describe the corrective actions set in place to limit risks
- Provide Ethics policies and procedures
- Setup an effective whistleblower procedure to report corruption and bribery

e. Results of the audits

In 2025, 3 audits were performed (1 in the Chinese EMS and 2 in the repair centres). Though non-conformities were reported, no issue was reported concerning a risk of modern slavery.

f. Business reviews and consequences

Business reviews are organized with suppliers to discuss their performance and the evolution of contracts if they don't comply with Ingenico's expectations on modern slavery. Non-compliance by Supplier with the requirements set out by Ingenico may compromise the Supplier's business relationship with Ingenico, up to and including termination.

7. Training and Awareness

As ethics is one of the foundations of its business model, Ingenico has established a mandatory annual training programme for all Ingenico employees, addressing topics such as the Code of Ethics. In 2023, the Code of Ethics was redesigned by the



compliance team, and mandatory trainings have been setup in the internal eLearning platform. This eLearning is updated regularly to reflect any significant changes to the Code.

In 2025, The refresh of the code was associated with a change in process to make sure employees are trained on Ethics and to include this training in the onboarding of the newcomers. Nevertheless, this refresh was executed late in the year and the new training was effective only starting December 2025.

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 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 1st of January 2025 up to and including the 31st of December 2025 pursuant to the United Kingdom Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

The Supervisory Board of Ingenico as its principal governing body has approved this Statement on 22/07/2026.

Signed by:

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Floris De Kort
CEO
July 2026