

## **UK-based subsidiaries of Global Payments Inc.**

### **Slavery and Human Trafficking Transparency Statement**

The Modern Slavery Act 2015 came into effect on 29 October 2015 and requires each company conducting business in the UK and having annual turnover of at least £36 million to provide information regarding the steps it has taken to prevent slavery and human trafficking from occurring within its business and supply chain. We fully support the aims of the Act, and this statement sets forth the steps we have taken to ensure that slavery, forced labour and human trafficking is eradicated from our business.

We make this statement with respect to our financial period ended 31 December 2022 and on behalf of our affiliates GPUK LLP, Total System Services Processing Europe Limited, TSYS Card Tech Limited and TSYS Managed Services EMEA Limited.

#### **Our Business**

We are UK-based subsidiaries of Global Payments Inc., a leading worldwide provider of payment technology services delivering innovative solutions to customers globally.

As part of a multinational corporation, GPUK LLP distributes its services across a variety of channels to merchants and partners throughout North America, Europe, the Asia-Pacific region and Brazil.

Total System Services Processing Europe Limited, TSYS Card Tech Limited and TSYS Managed Services EMEA Limited provide electronic and payment processing related services for payment providers, businesses and consumers in more than 80 countries throughout the world.

We work with global suppliers across a number of different industries including businesses with operations in each of the geographic regions where we distribute our services.

### **Our Principles**

We are committed to upholding the highest ethical standards in all of our corporate activities. In connection with this commitment, we have adopted an Employee Code of Conduct and Ethics. Our Code of Conduct sets out the internal policies which all of our employees are required to follow in the course of their employment and representation of the Company. All employees must understand and comply with the Code of Conduct, and we deliver annual training on the Code of Conduct to underscore the Company's commitment to conducting business with integrity and in an ethical manner.

### **Our Supply Chain**

In addition to conducting our business in accordance with our Code of Conduct, we strive to ensure that our supply chains do not contribute toward slavery, forced labour or human trafficking. We are committed to partnering only with vendors who share our standards and our commitment to conducting business in an ethical manner, and we seek to identify those who have taken steps to prevent slavery and human trafficking within their own businesses and supply chains. Following is a summary of some of the steps we have taken to ensure that our vendors meet these standards.

*Vendor Risk Management Program.* We have developed a comprehensive Vendor Risk Management Program which governs our engagement with each of our vendors across the Company. The Vendor Risk Management Program involves checkpoint reviews and assessments, prior to and throughout the course of our relationship with each vendor, to allow us to confirm that they conduct business in accordance with our expectations. The Program is centrally managed and regularly audited to confirm compliance across the Company.

*Risk Assessment and Due Diligence.* Prior to entering into a relationship with a new vendor, we conduct due diligence activities to assess the risks of partnering with that vendor and to provide assurance that the vendor meets our expectations regarding adequate controls. As part of these due diligence exercises, we require that our most significant vendors are compliant with applicable laws related to forced labour and human trafficking and that they have implemented appropriate controls to ensure forced labour and human trafficking do not occur within their businesses or their own supply chains.

*Worldwide Terms & Conditions.* Our contracts with our vendors contain specific terms and conditions which require them to comply with all applicable laws and regulations in their provision of goods or services and to conduct their business in accordance with our standards and expectations. We reserve the right to terminate our contracts for noncompliance with such laws, regulations and standards.

*ngoing Monitoring.* We conduct ongoing monitoring of our vendors to ensure that they are compliant with their contractual commitments and are delivering products or services in accordance with our standards. During this process, our most significant vendors are required to renew their assurance of compliance with all applicable laws and regulations, including forced labour and human trafficking regulations. Vendors which present heightened risks may be subject to additional audits or reviews, and those found to be in non-compliance with contractual commitments are subject to penalties, up to and including termination.

### **Recruitment Health Safety of team members**

To support our recruitment efforts we continue to ensure that there is a robust recruitment procedure in place. Our recruitment process is compliant with UK employment legislation and includes rigorous Right to Work checks, for example obtaining references, understanding employment gaps and reviewing original right to work documents to ensure vulnerable workers are not being exploited. CRB checks are undertaken on all new recruits.


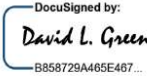


The Company uses reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

The Company's whistleblowing procedure is designed to make it easy for team members to make disclosures without fear of retaliation. The Company encourages all employees to report any concerns anonymously through Ethicspoint. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking.

### **Training Policy**

To maintain awareness of modern slavery and human trafficking across our business, all employees are required to complete the annual mandatory training, we also have an Anti-Slavery & Human Trafficking Policy in place.

This statement has been approved by the directors of Global Payments UK Limited  
 Total System Services Processing Europe Limited, TSYS Card Tech Limited and  
 TSYS Managed Services EMEA Limited.

| Signature  | Title and Subsidiary   | Date         |
|--|--|--------------|
| <br>Graeme Horsfall | President & Managing<br>Director, UK & Ireland,<br>Global Payments | 15 June 2023 |
| <br>David Green     | Director, Total System<br>Services Processing<br>Europe Limited    | 21 June 2023 |
| <br>David Green    | Director, TSYS Card Tech<br>Limited                                | 21 June 2023 |
| <br>Rene Kruse    | Director, TSYS Managed<br>Services EMEA Limited                    | 16 June 2023 |