

Statement

Worldline
modern slavery
statement
2019



Empowering the cashless society

Worldline

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that PaySquare SE, insofar as they fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 (the Act), have taken during the year ending 31 December 2018 to ensure that slavery and human trafficking are not taking place in their supply chains and in any parts of their business.

Worldline is a leading provider of digital payment and ecommerce services to clients principally in the banking, retail, telecoms and transport industries. During the year ending 31st December 2018 Worldline was part of the Atos global group of companies (Atos) which provides systems integration services, consulting, managed services, business process outsourcing, cloud operations, big data and cyber-security solutions.

Conducting business in an ethical and sustainable way is part of Worldline's culture and strategy in all of its spheres of influence, it is a "must have" that Worldline 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.

As part of the Atos Group of companies Worldline Group companies have generally adopted Atos corporate policies and procedures as their own with respect to their supply chain, procurement and HR operations. In May 2019, Atos divested its majority shareholding in the Worldline Group and consequently Worldline and Atos now operate entirely separately. Notwithstanding this Worldline continues to follow those processes and procedures that have their origins with Atos described in

this document. Over time these will be reviewed to ensure their continuing relevance to the Worldline business and to the new procurement and HR departments operating in Worldline.

In 2017 Atos and Worldline published their first Modern Slavery statement which was approved by the applicable Worldline boards. Since then a number of improvements to the Corporate Social Responsibility program, to due diligence initiatives within the supply chain, and our Code of Ethics in light of the Modern Slavery Act 2015 requirements, have been made which Worldline continues to implement in its corporate processes.

In this document we describe our business and supply chain and explain our Corporate Social Responsibility program, due diligence initiatives within our supply chain and our Code of Ethics' training.

Worldline follows a Corporate Social Responsibility program, which also includes labour practices, with its main objective being the management of the company's operations in a responsible and ethical manner and to integrate social and environmental factors in our supply chain. A number of policies and documents have been developed and implemented to achieve this objective and are described in this statement.

¹ By Worldline Group we refer to all companies that are controlled directly and indirectly by the holding company of the group, Worldline SA during the financial year ending 31st December 2018

² By way of clarification this is true of all Worldline Group companies that are within scope of the Act



Policies and Contractual Controls

Code of Ethics

Worldline operates an internal **Code of Ethics Policy** which all Worldline employees are required to adhere to.

Within the Code of Ethics Policy, Worldline is committed to ensuring compliance with international labour regulations and to being a responsible company in dealing with all its partners, guaranteeing strict compliance with laws and regulations.

Most importantly, the Code of Ethics Policy refers to the United Nations Global Compact principles on human rights, labour, environment and anti-corruption, which includes adhering to the elimination of all forms of forced and compulsory labour and the effective abolition of child labour, upholding the freedom of association and the effective recognition of the right to collective bargaining as well as supporting and respecting the protection of internationally proclaimed human rights.

Code of Conduct for Relationship with Suppliers

In addition to the Code of Ethics Policy, Worldline employees who perform procurement related activities on behalf of Worldline or who have regular contact with suppliers must abide by a strict Code of Conduct which is described via internal communication systems and distributed annually to Worldline team members.

This Code of Conduct establishes the elementary rules that each employee must respect in the performance of his or her work with clear references and special attention to social rights.

In particular, as far as slavery and human trafficking are concerned, the Code of Conduct expresses the clear intention to select suppliers who do not use or accept that their own suppliers and subcontractors use child or forced labour, do not practice or support any psychological or physical coercion, respect individual and collective liberties, and comply with labour laws on recruitment and during the fulfillment of the employment contract.

Procurement members need to sign this document to confirm that they have read and understood it. Failure to comply with this Code of Conduct may result in disciplinary actions, up to and including termination of the contract of employment.

Whistleblowing Policy

PaySquare SE operates a Whistleblowing Policy. This Policy educates and advises on the legalities and principles of whistleblowing and the process of how to make a disclosure about suspected wrongdoing in the workplace, either internally or externally.

Supply Chain Standards

Worldline's supply chain supports the sale of hardware, software and services by Worldline to its customers, as well as the operation of its day to day business operations. To achieve this, Worldline procures various hardware and software components and services from suppliers located worldwide.

Following a supply chain review in 2018, a new Business Partner's Commitment to Integrity was produced. This establishes requirements that all Worldline suppliers have to comply with in three areas: Human Rights, Business Integrity and Environmental Impact. The prevention of forced or compulsory labour is part of the Human Rights requirement that our business partners and suppliers, have to support, respect and encourage within their supply chain.

Prior to suppliers' participation in any Worldline sourcing event, a potential supplier must confirm acknowledgement of the Business Partner's Commitment to Integrity and the supplier will sign up to its content upon the signature of the Worldline supplier terms.

Failure by suppliers to comply with the Commitment to Integrity or to effectively marshal resources required to achieve compliance with it, can result in their exclusion from Worldline's preferred suppliers list and, once a contract is in place, even to the termination of the contract with that supplier.

Also, by accepting this Commitment to Integrity, suppliers recognize Worldline's rights to perform on-site audits to ensure that they have put adequate internal procedures in place to enable them to fulfil their integrity commitment.

Moreover, our standard UK supplier contractual terms and conditions include obligations on suppliers to comply with the provisions of the Modern Slavery Act 2015 and to ensure that (i) neither they nor their subcontractors are under investigation or have been convicted for modern slavery offences, (ii) they conduct reasonable due diligence on their own supply chains' working conditions and practices and (iii) they notify promptly in the event of suspected slavery and human trafficking offences taking place in their supply chains.

Last but not least, since 2018 the Code of Ethics Policy has been an integral part of the standard supplier contractual terms: this means that, if a supplier violates the Code's principles, Worldline can terminate its relationship with the supplier.

Due Diligence and Audits in our Supply Chain

In order to ensure that slavery and human trafficking are not committed throughout our supply chain not only do we have to clearly communicate our expectations for fair labour practices to our suppliers, but we also must anticipate, identify, control and manage any such possible risks and impacts. We have accordingly built appropriate mechanisms in all stages of the procurement cycle, from the initial supplier selection through to on-going supplier management.

Before contract

Sustainability, which includes labour practices, is one of our key supplier evaluation criteria when selecting new partners, suppliers or subcontractors, representing up to 10% of the scoring used in the evaluation of suppliers' answers to tenders. Our suppliers are required to demonstrate their maturity on Corporate Social Responsibility (CSR) themes by submitting any existing and globally recognized accreditation and certification that they have.

If an area of concern is identified, and always depending on the supplier product/service and geography, our procurement managers, accompanied by the relevant subject matter experts, may choose to proceed with a physical audit of the supplier facilities and operations or request further details and documentation to alleviate any concerns before progressing any further with the specific supplier.

Post contract

In addition to this initial due diligence, Worldline has been assessed by EcoVadis, a specialist assessor of sustainability in global supply chains, to proactively monitor and evaluate in depth its suppliers' portfolio globally in four key areas: Environment, labour practices, Fair Business Practices as well as Sustainable procurement. The area focusing on Labour Practices and Human Rights is described by EcoVadis as below: "*The criteria in this theme are divided into 2 parts: first on human resources (such as health & safety, working conditions, structured social dialog, career management & training) and secondly on human rights issues (such as child & forced labour and discrimination)*". Hence, the EcoVadis assessment goes beyond regulatory compliance and working conditions and child and forced labour are some of the key areas that are evaluated.

Specifically, EcoVadis methodology framework assesses the policies and measures put in place as well as the reporting published by companies with regard to those four key areas. The assessment, conducted by CSR experts, is made on the basis of the companies' answers to a survey which is dynamically adapted to their country, sector and size, on the basis of supporting documentation, and on public and stakeholders' (NGOs, trade unions, press) information. The EcoVadis assessment is repeated every two years.

As a result of this EcoVadis assessment, strengths and improvement areas are identified, with the latter being addressed by a Corrective Action Plan (CAP) that the relevant supplier should prepare and comply with. Our procurement sustainability managers proactively monitor the progress of these CAPs by the suppliers concerned

and those suppliers with insufficient scores are advised to be re-evaluated after 12 months. In 2018, less than 14% of Atos Group's panel at global level (which includes Worldline suppliers) had low scores, usually only because of a misunderstanding of the assessment processes.

However, where a score cannot be improved a decision may be taken to cease our engagement with the relevant supplier. We have had an instance, for example, where a supplier of indirect products was unable to provide sufficient assurances around absence of child or forced labour in its supply chain; due to the possible risks associated with the products that were being purchased, we decided to cease trading with the supplier and to procure products from an alternative, assured supplier.

The year 2018 closed with 292 suppliers having a valid EcoVadis assessment, which represents 55 % of Atos Group global spend. This KPI has improved compared to last year's figures.

In 2018, EcoVadis granted 'Gold' status to Worldline Group specifically for its Corporate Social Responsibility performance in 2018, confirming its leadership position in the IT Industry in respect of CSR themes.

Last but not least EcoVadis offers an alert service providing news updates and information about watch lists, including legal proceedings involving tier 1 suppliers that have completed the EcoVadis assessment. In such a way, we are made aware of any wrongdoings including those in relation to modern slavery offences by our supply chain.

³ With Atos Group we refer to all the companies controlled directly and indirectly by the holding company of the group, Atos SE during the financial year ending 31st December 2018 (including the Worldline Group of companies).

Training

The Worldline Code of Ethics Policy has formed part of Worldline employees' employment contract for some years. Worldline requires all employees regardless of their position to complete an e-learning module that explains the principles of the Code of Ethics and top managers and all persons considered directly concerned with the application of the Code of Ethics' principles in their day-to-day duties, are provided with classroom training on the Code of Ethics by the company senior legal team. In 2018 a new version of the code was launched and all employees were required to retake the training. At the date of publication of this statement over 96% of UK Worldline employees have undergone this new Code of Ethics training.



Closing Statement

Worldline is globally recognised as a sector leader for its Corporate Social Responsibility program. We understand that 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 out on an ongoing basis. Moreover given Worldline's very recent separation from the Atos group of companies, Worldline intends to implement a project to reassess the application of these measures and policies within the Worldline business to ensure their continued effectiveness in ensuring that slavery and human trafficking does not take place within Worldline's supply chain nor any part of its business.

This statement was approved by the Boards of PaySquare SE.

Signed



M.L.J. Ruppe van der Voort
CEO of PaySquare SE
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