

# Modern Slavery Statement 2025

## Introduction

Conducting business in an ethical and sustainable way is part of Worldline's culture and this is incorporated into all facets of its strategy. Worldline can influence things for the better through not only its own business policies and practices, but also its relationships with employees, customers, partners, and suppliers.

We recognise that slavery in all its forms, including servitude, forced or compulsory labour and human trafficking ("modern slavery") continues to be a significant issue, and we are fully supportive of efforts to eradicate these abhorrent crimes.

This statement has been published as a joint statement in accordance with the UK Modern Slavery Act 2015 and the Australian Commonwealth Modern Slavery Act 2018 ("Modern Slavery Laws"). It sets out the steps that Worldline SA and its subsidiaries ("Worldline"), insofar as they fall within the scope of the Modern Slavery Laws, have taken during the year ending 31 December 2024 to ensure that slavery and human trafficking are not taking place in their supply chains and in any parts of their business.

## Organisation structure, operations and supply chains

### Worldline

In 2024, Worldline employed c. 18,000 employees worldwide, over 77% of whom are based in Europe. Worldline prioritises internships, apprenticeships and graduate employment in Europe and India (500+ apprentices and interns hired in 2024). There were 161 workers employed by Worldline under temporary contracts, and no seasonal workers or workers without guaranteed hours.

Approximately 20% of employees are employed in countries deemed 'sensitive' e.g. China, India, Singapore, United States, Indonesia, Hong Kong, Malaysia. These are countries which have been identified as being at higher risk in terms of violations of employment laws and in which compliance with established Human Rights and employee rights are consequently particularly important.<sup>1</sup>

The Group provides an extensive range of merchant acquiring, payment processing and business solutions to financial institutions, merchants, corporations, and government agencies.

Worldline S.A., the Worldline group's parent company, is a public limited company (Société Anonyme) under French law and is registered with the Registry of Commerce and Companies of Nanterre. The Company is governed by a Board of Directors. The Operational Executive Committee meets weekly, leads, and implements Worldline's overall strategy and business ambitions, and a number of other committees exist to direct specific areas from a group perspective, including the Social and Environmental Responsibility Committee.

Modern slavery is a topic which is of importance to different Global Functions, whose policies determine the actions required at both global and local or entity level. Legal and Compliance are responsible for ensuring that legal and ethical requirements are met, both within the organisation, and within any other contractual relationships, and Compliance would investigate any concerns raised about any abuse of Human Rights; Human Resources look after the interests of employees; Procurement manages the selection, and ongoing management of suppliers; and the Corporate Social Responsibility (CSR) team helps manage the company's CSR strategy. This cross-departmental approach ensures that risk of modern slavery is considered throughout the company and there are appropriate policies in place.

Worldline activities are organised around three Global Business Lines (GBLs), namely: Merchant Services, Financial Services, and Mobility & e-Transactional Services. Worldline provides modern payment solutions that help financial institutions meet their customers' needs; delivers complete digital journey for retailers and their customers and facilitates consumer engagement via seamless services on any device; offers a unique combination of payment processing on an industrial scale as well as innovative solutions for payment and card-related transactions.

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<sup>1</sup> [Worldline\\_URD\\_2024\\_assemblage\\_EN](#)

## Australia

In Australia, Worldline has both wholly owned subsidiaries and joint venture companies Worldline Australia Pty Ltd – (ABN: 50 645 073 034 known as ANZ Worldline Payment Solutions) operates as a merchant acquirer for businesses whose operations are carried out in Australia. It is a joint venture between ANZ Non-Bank Holdings Pty Ltd and Worldline SA and is part of Worldline’s MS service line. Worldline Australia Pty Ltd has a wholly owned subsidiary, Worldline Payment Solutions Australia Pty Ltd (ABN: 29 646 200 017), which is the entity that primarily engages with suppliers.

Separately, in Australia there is a wholly owned subsidiary of Worldline SA, Worldline Services Australia Pty Ltd, and is a platform provider to the Group. It has a wholly owned subsidiary, Bambora Online Pty Ltd. The registered office of each of Worldline Australia Pty Ltd, Worldline Payment Solutions Australia Pty Ltd, Worldline Services Australia Pty Ltd and Bambora Online Pty Ltd is Collins Square, Tower 4, Level 15, 727 Collins Street, Docklands, Victoria, Australia 3008. There are 379 employees across the four Australian Worldline entities.

## UK

There are four legal entities registered in the UK, Worldline IT Services UK Ltd, Worldline Merchant Services UK Ltd, Worldline Retail Enterprise (UK) Ltd and Worldline E-Commerce Solutions (UK) Ltd with over 550 employees across the four entities.

Worldline IT Services UK Ltd is the UK’s only entity operating in Mobility and e-Transactional Services, the others operating in Merchant Services. In 2024, it became Worldline’s second entity to be authorised by the UK Financial Conduct Authority (FCA), enabling it to offer regulated services within the parameters of its authorisation. Its diverse range of clients include train operating companies, and those in the hospitality and retail sectors.

The other three UK entities are part of the Merchant Services division and provide integrated secure payment solutions to UK based merchants, including regulated acquiring services provided by Worldline Merchant Services UK Ltd, the other entity that is authorised by the FCA.

## Suppliers

*Worldline’s Sustainable Procurement Policy* includes the selection, due diligence, ESG performance monitoring and management of suppliers. It is aligned with the framework and expectations described in the international organisation for standardisation’s ISO 20400 standard. Sustainable procurement governance is under the responsibility of the Worldline CPO in coordination with CSR, Compliance and Third Parties Risk teams.

In 2024, the majority of procurement costs are for items typically required by the IT services sector, that is, IT hardware and software, subcontracted services, and telecommunications services due to the extensive data processing required by Worldline business. Worldline’s European hub data centres process approximately 85% of the Group’s total transaction volumes,<sup>2</sup> reducing Worldline’s reliance on external suppliers for transaction processing, while also reducing the risk of the exploitation of workers through direct employment.

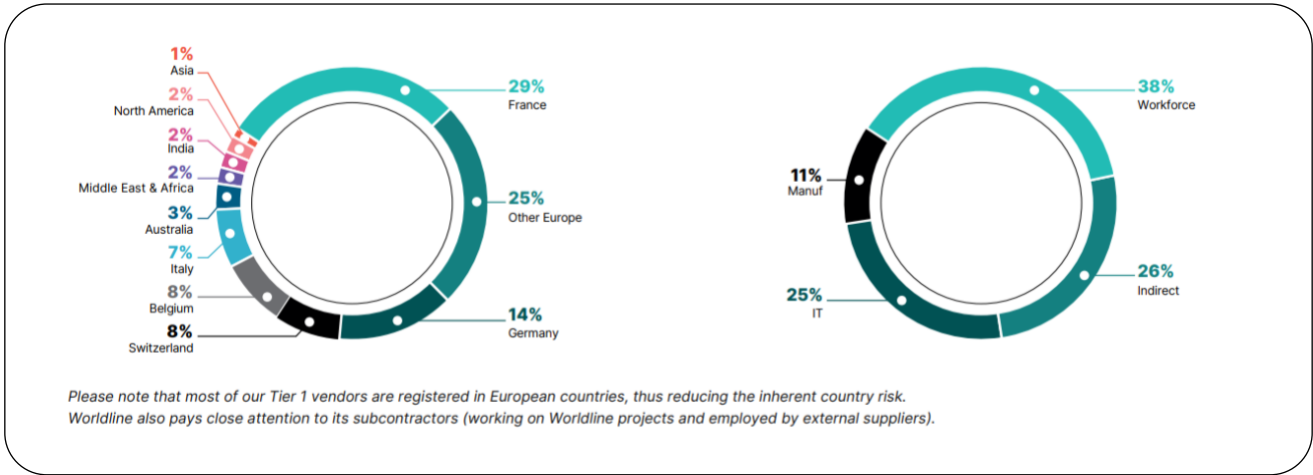
The procurement function is articulated around 4 main purchase categories overseen by the Chief Procurement Officer:

- **IT** (including Software, Hardware and Telecommunications).  
The Group’s main suppliers of IT hardware and software include suppliers such as IBM, Dell, Oracle, HPE (Hewlett Packard Enterprise), and SAP. The Group’s business involves extensive data processing which requires bandwidth intensive telecommunications services, its main providers being Orange and Proximus.
- **Workforce**: all the subcontracting services for software development and maintenance.
- **Manufacturing & CapEx**: Other important categories of products and services include POS Terminals and their component parts. The Group sources its terminals from companies such as Ingenico, Castle, or NEWPOS. Delivery and installation of terminals also involves large logistics providers like Toll.
- **Indirect**: Worldline also has indirect costs, including significant postal services-related costs due to our bank processing activities in Belgium.

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<sup>2</sup> [Worldline URD 2024 assemblage EN](#)

Worldline monitors its spend (purchasing expenses from external providers) through a monthly dashboard for performance and KPI monitoring. In 2024, Worldline’s total spend reached approximately €1.25 billion for around 7,600 vendor legal entities (Tier 1) in 70 countries. The breakdown of Worldline’s spend by main purchase categories and by supplier countries is as follows:



To implement its actions in the most efficient and relevant manner, Worldline relies on a supplier categorisation: the suppliers with top spending (at least 250k€/ year) and long-term relationship with Worldline are identified in a strategic suppliers list. This classification is set by buyers at parent company level during the vendor on-boarding phase, and is reviewed monthly, enabling the procurement team to apply different follow-ups and risk monitoring depending on the status of the supplier.

## Policies in relation to slavery and human trafficking

### Worldline Policies: Introduction

Worldline’s policies fall into two complementary areas – the Group policies which establish the minimum standards which must be observed throughout the Group, for instance any legal requirements that are applicable to all legal entities regardless of the country of operation, and local policies which reflect the needs of local legislation or operational needs.

Local HR teams maintain policies to ensure compliance with all aspects of applicable national employment legislation, from employee’s basic statutory employment rights, which exceed basic protections against modern slavery; to employers’ legal obligations respect of these rights, and to act lawfully when employing someone e.g. verifying that a new employee has a legal right to work in the country.

Worldline Group policies are developed by the relevant Global team through a process of writing, review, consultation with workers’ councils where applicable, and each have a sponsor to ensure that the tone from the top is maintained and the involvement and commitment of senior management is visible and are reviewed every two years, or sooner if required.

Information about new and revised policies is shared in a variety of complementary ways. All employees must complete mandatory training, and this forms the basis of communication about core policies.

### Code of Ethics

Worldline’s Code of Ethics, at the heart of Worldline’s culture, was revised in 2024 and was available to employees in 12 languages internally from the end of the year. The newest version adopts an expanded format, which includes not only information about the expected standards of behaviour, but dos and don’ts, as well as FAQs, to help put these into an everyday context.

The section on Human Rights makes clear Worldline’s commitment to the effective abolition of modern slavery, as well as highlighting exploitative employment practices which are illegal, but may also indicate the possibility of modern slavery. Readers of the Code of Ethics, which includes both employees and third parties, are encouraged to report to Worldline via the Integrity Line (whistleblowing tool), if they have reason to believe that

someone working for Worldline, or one of its customers or suppliers, is a victim of modern slavery. More importantly, they are reminded that if they believe that a potential victim is in danger, this should be reported to the appropriate local authorities.

### **Human Rights Policy**

The policy was improved by making the existing working practice explicit; stating that it is not permitted for the employer to retain original documents used for verification purposes. This recognises the vulnerability of workers who are not in possession of their own documentation and means that Worldline does not permit this in any circumstances, regardless of the country of operation or whether or not such a prohibition exists under local laws.

While it is universally recognised that children are especially vulnerable and child labour is expressly prohibited, the policy also recognised that there may be special measures in place for young people by law, i.e. older than a child but typically still a minor as per the relevant local legislation, and that these measures must always be adhered to.

### **Sustainable Procurement Policy**

Worldline introduced its *Procurement Policy* in 2020, aligned with ISO 20400 Sustainable Procurement, adding its *Sustainable Procurement Policy* in 2024. As part of its commitment to sustainable procurement, both to reinforce this within Worldline and to demonstrate to Worldline's customers and suppliers the standards they seek to uphold, in 2024, Worldline SA signed up to *Relations Fournisseurs Achats Responsables*. This charter has ten commitments, the aim of which are to promote respectful relationships between companies and their suppliers, and ethics in procurement. (The full details of this, including the full list, can be found at [La Charte Relations fournisseurs et achats responsables | Ministère de l'Économie des Finances et de la Souveraineté industrielle et numérique](#))

### **Whistleblowing**

Worldline's *Whistleblowing Policy (Compliance Alerts Policy – Whistleblowing)* remains one of the most important tools for addressing any ethical or Human Rights issues that could arise. One of the key avenues for reporting is the *Worldline Integrity Line*, which had an update in 2024. This can be accessed freely via the internet and does not require any access to any Worldline systems. This platform exists so that anyone with any concerns about wrongdoing either within Worldline, or within its supply chain, can report this directly to Worldline. If Worldline received any reports of malpractice or ill use by workers within the supply chain, these would be treated as seriously as any received from a Worldline employee and handled accordingly.

## **Due diligence processes**

### **Suppliers**

The Procurement team manages the selection and onboarding of new suppliers, following the global vendor due diligence process. Its objective is to discover any corruption, ethical/ Human Rights abuse or risks associated with a vendor to ensure and maintain integrity within the supply chain in compliance with all anti-corruption and Duty of Vigilance (France) regulations.

The due diligence process includes the collection and checking of information supplied by the vendor; checking the vendor against international databases for red flags such as sanctions lists and PEPs (Politically Exposed Person), and map the risks inherent to the vendor country and the category of purchase (industry). This risk assessment must be completed before entering into a contract. The vendor is then assigned a risk score (low, medium or high) according to predefined criteria, before a decision is made on whether to proceed with the supplier.

The risk assessments for Worldline's suppliers have been updated to incorporate requirements of the Corporate Sustainability Reporting Directive (CRSD – EU). In 2024 Worldline has conducted the assessment on a sample of 64 new Partners, selected based on a high-level evaluation of the risks they may be exposed to, with regard to their type of activities and the countries they operate.

In addition to Worldline's supplier risk assessment, Worldline uses EcoVadis to assess the sustainability of strategic partners based on four key domains, that is, environmental impact, labour and Human Rights standards, ethics, and procurement practices.

In 2024:

- 143 strategic suppliers were listed at ultimate company level (legal entity or parent if applicable), representing 65.5% of the total Worldline spend.
- 95% of Worldline's spend with strategic suppliers was covered by an EcoVadis assessment, representing 86% of all strategic suppliers in terms of number.
- The average score of Worldline's suppliers was 66.1/100, higher than EcoVadis global average score (Worldline's score in 2024 was 86/100)
- 100% of suppliers with a score below 45/100 in one of the four pillars, or as an overall score, have been required to have an action plan to resolve critical findings identified.

Worldline conducted its first on-site CSR audit in 2024 at the premises of one of its terminal manufacturer suppliers, giving it the opportunity to take a hands-on approach to due diligence. The audit concluded that there were no major/critical findings.

## Other third parties

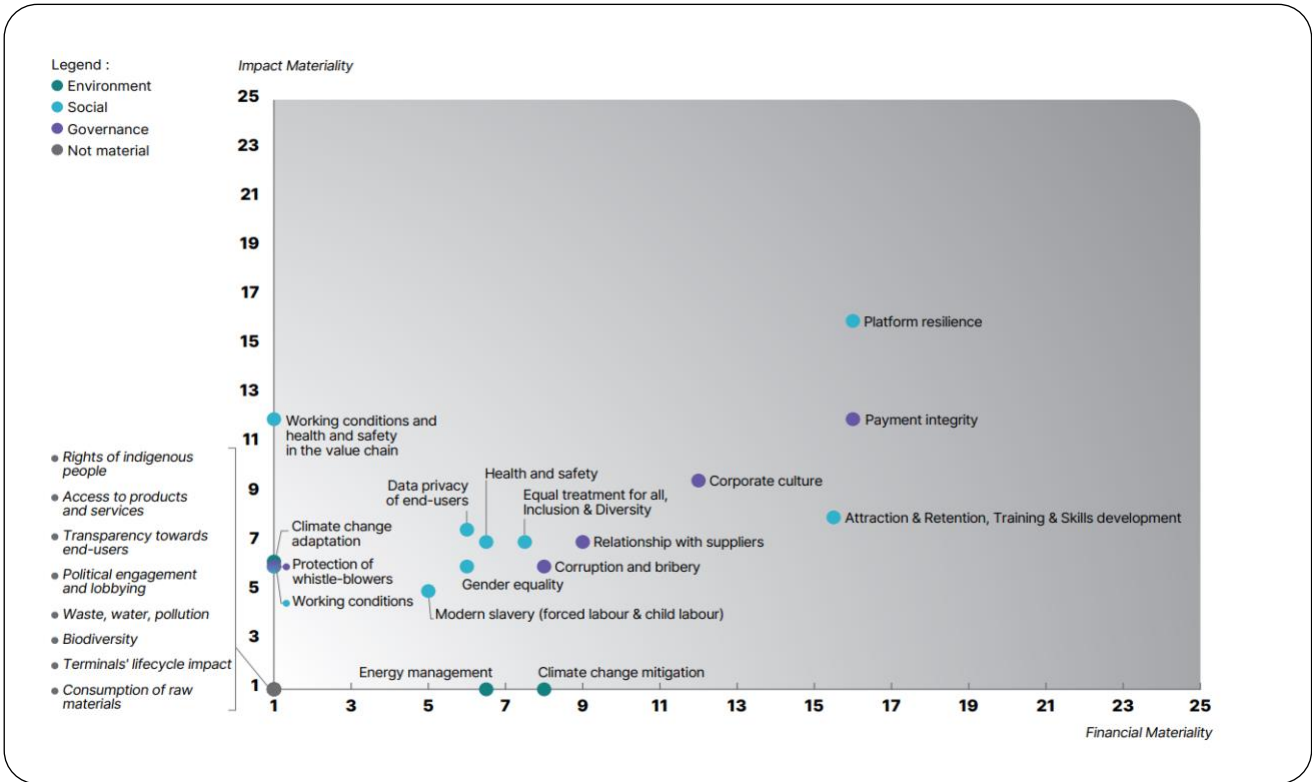
The Third-Party Risk team is responsible for conducting due diligence on other third parties including joint ventures and resellers, as well as evaluating the risks involved at engagement, or contract level. These risks include security, data protection and ethics and anticorruption, and provide a complementary assessment to the CSR assessments.

## Risk assessment and management

Human Rights are a matter of concern to all areas of the business. In addition to the risk assessments which form part of due diligence on prospective customers, suppliers, and partners, Worldline is also required to carry out risk assessments considering different operational matters, as part of duties under *Devoir de Vigilance* or the CRSD.

The risk assessment conducted for the 2024 Vigilance Plan has been updated as part of the CRSD requirements. The assessment requires the evaluation of risks associated with Worldline's business, that is, both those directly affecting Worldline and its employees (direct exposure: Worldline as an employer), and in its supply chains (indirect exposure: Worldline as a purchaser of goods/services). Worldline analyses the risks through a double materiality risk assessment, which considers both the impact on Worldline, and outside Worldline, such as local communities or the environment. This allows Worldline to develop or update an action plan, based on the prioritisation of the risks identified.

The risk domains are Human Rights and fundamental freedoms, health and safety, and the environment. Human Rights and fundamental freedoms, which includes employment rights, security of employment, and most importantly in terms of severity, the use of forced labour or child labour.



Risk mitigation plans are then developed to mitigate any risks identified within Worldline, or within its supply chains.

## Devoir de Vigilance risk assessment 2024

### Human Rights: findings

#### Worldline

Following the 2024 assessment, there were three points that were highlighted in the plan: to improve employees' understanding of Human rights, particularly in the workplace, their knowledge of how to report matters of concern, and to make it easier for them to do so. Improvements to the usability of the Worldline Integrity Line also benefit non-employees, who can also use this to report breaches of the *Code of Ethics* or whistleblowing matters.

#### Worldline's supply chains

Worldline launched a new communication channel in 2024 with Worldline's subcontractors to monitor the respect of their Human Rights and health and safety. This channel took the form of a workers survey initiative, sending a satisfaction survey to all Worldline subcontractors who have access to Worldline systems.

### Sustainable Procurement Policy: findings


It was noted that there were no reports of severe Human Rights issues (modern slavery, human trafficking or child labour) in Worldline or its supply chain in 2024. Any such reports would potentially impact our understanding or perception of the risk of modern slavery and would be considered accordingly.

## Key performance indicators to measure effectiveness of steps being taken

Worldline’s Trust 2025 programme has established KPIs across a range of topics so that there is a clear target to be achieved by 2025, which are monitored. The KPIs most relevant for modern slavery and human trafficking relate to sustainable procurement, and ethics and compliance. In addition to this, there are other KPIs monitored, as presented in the *Sustainable Procurement Policy*.

As the EcoVadis assessment plays such a key role in our understanding of the adequacy of the policies of our suppliers in relation to CSR, it is important that we have assessments of our strategic suppliers. For this reason, by 2025, at least 90% of our spend with strategic suppliers, must be with strategic suppliers who have been assessed by EcoVadis. In 2024, Worldline exceeded this target by reaching 95% of its expenses with strategic suppliers assessed by EcoVadis. Worldline also requires that any supplier which has a score of less than 45, must have an action plan in place to address critical findings.

### Trust 2025 KPIs

Topic	Indicator	2023	2024	Target 2025
 Sustainable procurement/Ethics & Compliance	<ul style="list-style-type: none"> <li>• % of suppliers evaluated by EcoVadis with a score below 45 having an action plan to solve critical findings identified</li> </ul>	100%	100%	100%
	<ul style="list-style-type: none"> <li>• % of total expenses assessed by EcoVadis out of strategic suppliers</li> </ul>	91.1%	95%	90%
	<ul style="list-style-type: none"> <li>• % of alerts investigated and related actions plan defined within 2 months</li> </ul>	98%	97%	100%

In line with the *Sustainable Procurement Policy*, additional KPIs are monitored, including the percentage of spend with ‘local’ suppliers, i.e. where the purchasing entity and the supplier are in the same country. By sourcing suppliers in the same country, the risk of benefitting from modern slavery is reduced where the country is at low risk of modern slavery.

The Sustainable Procurement & Compliance KPIs are included together within Trust 2025. This demonstrates Worldline’s recognition that the ability to investigate all Compliance Alerts in line with stated procedures and in a timely manner, so that action plans may be defined where required and implemented as quickly as is feasible, is of the utmost importance. The Worldline Integrity Line provides an important channel for individuals inside and outside Worldline to report matters of concern, therefore this KPI indicates how all reporters benefit from the proper and effective investigation and management of alerts, whether they are employees or non-employees. In 2024, 97% of alerts were investigated and had defined action plans within 2 months.

## Training on modern slavery and trafficking

### Worldline

#### All employees

Worldline’s annual programme of mandatory training is revised every year, and in 2024, the *Code of Ethics* training had a dual focus on the ten principles of the UN Global Compact, and a respectful work environment. The Global Compact provides a simple, and easy to understand overview of how Human Rights and ethical business practices fit together. As the risk of exposure to modern slavery and potential breaches of Human Rights is judged to be low for Worldline in most of its areas, the current approach is to incorporate Human Rights, and the absolute rejection of modern slavery, into the *Code of Ethics* training. This is something that may change as international laws and standards continue to evolve, including the Corporate Sustainability Reporting Directive (CSRD) as Worldline builds on best practice. The overall completion rate of the *Code of Ethics* training across Worldline SA and its subsidiaries was 97%.

## **Buyers**

Worldline recognises that the biggest area of risk of modern slavery is through our supply chains rather than through the direct or indirect employment of personnel working on behalf of Worldline. As such, Worldline provides annual training to buyers, which covers a range of CSR and Compliance (Ethics) topics, namely: compliance guidelines; changes to the regulatory landscape; new and updated processes; and internal materials used in the evaluation and onboarding of suppliers. While this does not focus exclusively on modern slavery and human trafficking, Human Rights and exploitative employment practices are an integral part of CSR, especially when we consider our choice of business partners. In 2024, the percentage of buyers who had received the annual training on sustainable procurement topics, reached 84%, an increase from 68% reached in 2023.

## **Suppliers**

In 2024, Worldline's Procurement team delivered a CSR training session for SME strategic suppliers to support them with their plans to improve their CSR performance and/or their non-financial assessments. In addition to this, Worldline has continued to conduct one-to-one interviews with some suppliers on CSR topics, with particular attention to those with poor EcoVadis scores ( $\leq 45/100$ ). This ensures that Worldline can understand their needs and provide support and guidance where this is possible.

## **Consultation**

In preparing this Modern Slavery Statement, we undertook a comprehensive and collaborative approach involving active engagement and consultation across multiple jurisdictions. Recognising that each region and team possesses unique insights and responsibilities, we facilitated discussions to understand the specific risks and practices relevant to each area. Members from various regions and teams made meaningful contributions by sharing detailed insights into their local practices and highlighting region-specific risks related to modern slavery.

Throughout this process, we ensured that all feedback was carefully considered and integrated into the final statement. This collaborative effort underscores our collective commitment to aligning with modern slavery legislation and best practices. Each jurisdiction and team took ownership of their individual risks and worked closely with others to foster a unified approach across the group, demonstrating our ongoing dedication to addressing modern slavery risks in a manner that is both comprehensive and contextually relevant.

## Closing statement

Worldline is globally recognised as a sector leader for its Corporate Social Responsibility programme. We understand that slavery and human trafficking risks pose a threat to international firms as well as to the freedom, rights, and wellbeing of workers. Worldline embraces the challenges presented by the ever-changing global environment, continuing to adapt to the needs both of an increasingly complex legislative landscape and changing business needs. Worldline will continue to review the effectiveness of the measures in place to ensure that it acts responsibly and in the best interests of all who work with or for us, and to ensure 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 Board of Worldline SA on 5 June 2025 on its own behalf and on behalf of all of its subsidiaries coming within the scope of the Modern Slavery Laws. It has also been approved by, or will be presented for acknowledgment to, the boards of those subsidiaries that are registered in UK or Australia, namely Worldline IT Services UK Limited, Worldline Retail Enterprise (UK) Limited, Worldline E-Commerce Solutions (UK) Ltd., Worldline Merchant Services UK Limited and Worldline Australia Pty Ltd and Worldline Payment Solutions Australia Pty Ltd. For the purposes of the Modern Slavery Act 2018 (Cth), the relevant reporting entity is Worldline Australia Pty Ltd (ACN 645 073 034). Each entity to whom this statement applies has reviewed and contributed to it.

**Pierre-Antoine Vacheron**  
Chief Executive Officer

## Statement Annexure

Mandatory Criteria	Section in this Statement	Page
Identify the reporting entity.	Introduction.	1
Describe the reporting entity's structure, operations and supply chains.	Organisation structure, operations and supply chain.	1 - 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risk assessment and management.	5
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Policies in relation to slavery and human trafficking.	3 – 4
	Training on modern slavery and trafficking.	7-8
Describe how the reporting entity assesses the effectiveness of these actions.	Due diligence processes.	4 and 6
	Key performance indicators to measure effectiveness of steps being taken.	
Describe the process of consultation with any entities the reporting entity owns or controls.	Consultation.	8
Provide any other relevant information.	Closing statement.	9