

Slavery and Human Trafficking Transparency Statement 2018

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (Modern Slavery Act) and sets out Worldpay's approach to dealing with the potential risk of human slavery and trafficking (as defined in the Act) occurring within Worldpay's supply chains or any parts of its business.

Introduction

Worldpay is a global leader in payments processing technology and solutions for our merchant customers. We operate reliable and secure proprietary technology platforms that enable merchants to accept a vast array of payment types, across multiple channels, anywhere in the world.

Worldpay is an innovator in card payments, multi-currency processing, online and contactless payments, leading the way in expanding global reach, data analytics and optimisation, and the emerging field of integrated payments.

The vast majority of our products and services are technology related and sourced from professional suppliers within the UK (46%) or the US (42%) with the remaining suppliers coming from Europe (8%) and Asia Pacific/Latin America (4%). In addition, Worldpay's highly skilled workforce is comprised primarily of permanent workers (75%), with the balance being contingent workers (25%). As a result, Worldpay faces minimal risk of experiencing slavery and human trafficking issues within our supply chain.

Worldpay Principles

Worldpay recognises its role as a global leader in payments processing and its responsibility to respect human rights as set out in the International Bill of Human Rights (IBHR). Our management team is committed to winning the right way, which includes respecting the rights of individuals whom we employ, as well as working with suppliers that hold these same values. Worldpay's principles are captured in our Code of Business Conduct and Ethics, which is distributed to all employees. This Code articulates management's guidance that all employees follow all laws and regulations and act ethically at all times.

Policies

Our policies are consistent with human rights principles and applicable human rights legislation in the countries in which we are located. Worldpay management has communicated its commitment against slavery and human trafficking through the development of policies that clearly articulate management's guidance against such practices both within our business and by the suppliers that support our organisation.

Policies have been developed and distributed to our employees covering matters such as Training and Competence, Remuneration, Internal Vetting and Ethics. These include the Whistleblowing Policy, Anti Bribery and Corruption Policy and Conflicts of Interest Policy.

Human Rights Engagement

Many of our colleagues are members of the union Unite. In addition, we employ a dedicated full time Corporate Social Responsibility (CSR) specialist to develop and enhance our CSR activity, who was appointed in response to feedback from our regular colleague engagement surveys – just one of the ways in which colleagues drive a caring culture.

Supplier Due Diligence

Worldpay is strongly opposed to slavery and human trafficking and we will not knowingly support or do business with any organisation that is involved in either. This commitment is underpinned by our Supplier Management Policy and our approach to procurement and supplier management activities which require our businesses to undertake due diligence upon the suppliers we engage.

The Worldpay Procurement team follows standard frameworks and processes to ensure there is prompt payment to suppliers, strong governance in place to manage and strategically plan the supplier landscape and ensure Worldpay selects suppliers that hold the same high business standards and values that we hold ourselves.

Worldpay's supplier lifecycle includes planning, due diligence, contracting, ongoing monitoring and termination phases. When our business identifies the need for a service or supplier, the planning phase begins. This phase includes internal discussions on both the needs as well as the best partners to fulfil these needs. While the majority of our services and the suppliers that support them are low risk from a slavery and human trafficking perspective, during initial planning conversations regarding new suppliers, there are open discussions where any employee may raise a concern with respect to any issues inclusive of slavery and human trafficking.

Once a supplier is identified, the Worldpay Third Party Risk Management team performs a risk based due diligence review of the proposed supplier. This due diligence review process includes focus on the regulatory compliance of our suppliers inclusive of human slavery and trafficking. As part of our due diligence review, Worldpay has partnered with a leading provider in establishing Supplier Sustainability Ratings to provide perspective on our high risk suppliers. Suppliers are rated across 21 criteria including Social (Employees Health & Safety, Working Conditions, Career Management & Training, Child & Forced Labor, Discrimination, Fundamental Human Rights) and Ethical (Corruption & Bribery, Anticompetitive practices) to determine their sustainability rating. At the end of this due diligence process, Worldpay has comfort that the supplier it has chosen to partner with will be able to meet its obligations to Worldpay while also doing business in a legal and ethical manner.

Worldpay's Procurement organisation facilitates the contracting with suppliers. During the contracting phase, Worldpay executes contracts that outline our requirements that suppliers operate in full adherence to applicable laws at all times. In our standard terms and conditions, we make reference to compliance with the Modern Slavery Act and an obligation on suppliers to sign up to our [Supplier Code of Conduct](#). This code includes statements that we will respect all internationally proclaimed human rights, that we won't engage in or support child labour, and that we will employ only workers who meet the minimum legal age requirement for their country. We have updated our Supplier Code of Conduct to cover the issue of Modern Slavery as we believe it is crucial that our suppliers are committed to the importance of Human Rights in their own supply chains as well.

Once suppliers are on-boarded, they move into ongoing monitoring. Ongoing monitoring includes reperformance of due diligence activities on high risk suppliers. This includes regular on-site assessments of our high risk offshore suppliers. When performing on-site assessments, Worldpay looks at many factors including the health and human safety practices of our suppliers. Worldpay will not certify a new supplier facility for use unless it meets our requirements including, for example, local building and safety regulations.

Worldpay leverages its Supplier Sustainability Ratings provider as well as other sources of information to monitor its high risk suppliers. If questions arise from these activities, our Procurement and Third Party Risk Management employees investigate these questions. While Worldpay has never terminated a supplier for slavery or human trafficking issues, our contracts are structured to do so if a supplier operated outside of legal or regulatory requirements.

Training

Worldpay has a robust reoccurring training program for all of its employees. This training includes specific topics from our Code of Business Conduct and Ethics to ensure that our employees understand it is Worldpay's expectation that all employees act in a legal and ethical manner in the performance of their job duties.

Worldpay recognised that training specific to slavery and human trafficking would be necessary to ensure those individuals directly responsible for the procurement and monitoring of suppliers had the knowledge necessary to identify slavery and human trafficking risks. Worldpay partnered with its Supplier Sustainability Ratings provider to develop and deliver this training, which was delivered to the Worldpay Procurement and Third Party Risk Management departments.

This training was tailored to the Worldpay business model in order to help us highlight potential high risk areas which include but are not limited to IT hardware and sub-contracted workforce of potential vulnerable groups (such as low-skilled, seasonal or migrant workers). The training also enabled us to further enhance the steps we take to remove Modern Slavery from our supply chains.

In addition, this training was recorded for future reference on Worldpay's Intranet site which is available to Worldpay employees. By providing this training to these groups and making it available to all employees, we believe we have greatly reduced our risk of interacting with suppliers who participate in slavery or human trafficking practices.

Monitoring

Our Code of Business Conduct and Ethics clearly articulates Worldpay's expectations that all employees and suppliers act in a legal and ethical manner. In order to ensure that we all live up to that standard, Worldpay has implemented procedures for our employees to report concerns where we may not be living up to those expectations. Worldpay has its Whistleblowing Policy (concerns arising under which would be raised to the Group Risk Committee) and procedures through which employees can anonymously contact SafeCall. Worldpay also has an Anti-Bribery and Corruption Policy, Conflicts of Interest Policy, and multiple sector policies so that our expectations are clearly communicated to our employees.

As noted above, Worldpay has ongoing monitoring of its suppliers. By using a Supplier Sustainability Ratings provider, Worldpay is able to continuously monitor its high risk suppliers to ensure that they have not acted in a way that goes against Worldpay's expectation that they adhere to applicable laws and regulations. In addition, our monitoring includes on-site assessments for our high risk suppliers. We use these assessments to validate that our suppliers are not only living up to our expectations for services (meeting their contractual obligations) but to also ensure that our suppliers follow legal and regulatory requirements including the Modern Slavery Act.

Moving forward, Worldpay expects that it will develop Key Performance Indicators (KPIs) that align to and support its Enterprise Risk Management (ERM) framework for compliance with slavery and human trafficking requirements.

Conclusion

In 2018, we are taking a firm approach in reducing the risk of Modern Slavery in our supply chains. By engaging with a leading provider in Supplier Sustainability Ratings we aim to gain greater insight into our supply chains and highlight how we can improve our processes and practices. As part of our approach to supply chain management we currently, and will continue to:

- Provide training to our key procurement and third party risk management groups to recognise the risks and warning signs of modern slavery and human trafficking with suppliers
- Include in our standard terms and conditions reference to compliance with the Modern Slavery Act and an obligation on suppliers to sign up to our Supplier Code of Conduct. This code includes statements that we will respect all internationally proclaimed human rights, that we won't engage in or support child labour, and that we will employ only workers who meet the minimum legal age requirement for their country
- When contracting on third party supplier terms, seek to include contract clauses relating to modern slavery and human trafficking in our terms with third parties for the supply of goods and services, and where possible, require suppliers to sign up to our Supplier Code of Conduct
- Maintain lists of those signed copies of the code
- Using a risk based approach, perform due diligence of our suppliers that includes procedures to assess the risk of modern slavery and human trafficking
- Build relationships with reputable suppliers
- Conduct on-site assessments of many of our supplier sites

This statement was approved by the Board of Directors of Worldpay on June 22, 2018 and will be reviewed annually. It is available on our website at: www.worldpay.com.



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