



## InComm Europe Limited

### Modern slavery and human trafficking statement - FY19/20

#### Introduction

This statement is made on behalf of InComm Europe Limited ("InComm").

Modern slavery is a crime and a violation of fundamental human rights. It can manifest in several forms, such as slavery, servitude, debt bondage, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. InComm Europe Limited are committed to running our business responsibly and we applaud the international legislative effort to combat modern slavery and human trafficking.

We conduct our affairs in an ethical way, demonstrative of our commitment to identifying and tackling risks of modern slavery and human trafficking within our business. We believe in acting with integrity, fairness and accountability: principles which are fundamental to fostering an inclusive society and a successful business. We work closely with our suppliers and we expect the same from them.

#### Structure and Supply Chain

InComm was incorporated in 2004 and is based in Whiteley, Hampshire, UK. Our company has approximately 25 employees and a global turnover of £43 million.

InComm is a global company that transforms the shopping experience through innovative prepaid products and ground-breaking payments technologies, including digital platforms which allow brands and distributors to sell, promote and deliver prepaid products both digitally and physically, point-of-sale payment technologies, third party gift cards, product control technologies, bill payment solutions, wireless payment technologies, online payment processing strategies and prepaid cards for tolling and transit payment solutions.

InComm operates in the payments and financial services and prepaid voucher sectors. Our mission is to be the network that transforms the global commerce experience through innovative payments technology for retailers, brand and consumers.

We work with a wide range of suppliers to deliver our products to end customers. Our largest suppliers are Amazon, Apple and iTunes, Google, Microsoft, Nintendo, and Sony. We also work closely with card printers to print gift and prepaid cards, namely Smart Plastic Cards Ltd and Incodia International Ltd.

We are committed to continuously improving our practices to identify and eliminate any slavery and human trafficking risks in our business and supply chains, and to acting ethically and with integrity in all business relationships.

#### Policies on Modern Slavery

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This underpins our commitment to the elimination of slavery and human trafficking.

We aim to foster a trusting, open and inclusive environment within our business and treat each person we deal with in a manner that reflects our values. We expect all our people to treat each other, and those we deal with, respectfully and with dignity. We do not tolerate physical violence, threats, verbal abuse, disrespectful behaviour, bullying or harassment of any kind.

Demonstrative of this, our employee Code of Conduct requires employees to be honest and ethical in all work and professional relationships, to treat everyone fairly and courteously, to have mutual respect in the workplace and not to engage in any unlawful or unethical activity. Violations of our Code of Conduct are investigated thoroughly and may result in disciplinary action, including immediate termination.

We encourage our people to raise ethical and legal concerns, including any concerns about human rights issues. We also stress that we have zero tolerance for retaliation against anyone who speaks up in good faith. We respect

and comply with all laws, rules and regulations which apply to our businesses around the world, as well as human rights and fair employment practice.

#### Due Diligence Processes, Risk Assessment and Measuring Effectiveness

We assess and manage the risk of modern slavery and human trafficking occurring in our business and supply chains on an ongoing basis. In response to developing codification of anti-slavery and human trafficking law throughout the world, we are considering our options for auditing the risks of human trafficking and modern slavery throughout our entire supply chain, and will look to trial various evaluation methods. For example, we are exploring the deployment of a whistleblowing scheme to provide security for those identifying slavery risks within our supply chain, and of a supply chain questionnaire programme designed to provide greater clarity over our supply chain and the measures our suppliers adopt to combat modern slavery and human trafficking.

We are committed to internal accountability standards and procedures for employees or contractors failing to meet our standards regarding modern slavery and human trafficking. We choose our suppliers with care through a number of evaluations, including based on their reputation and integrity.

#### Training for Staff

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. We run mandatory compliance training for all employees on an annual basis, which requires employees to complete our annual compliance training curriculum. The curriculum consists of various training and refresher courses, and includes several relevant to modern slavery and human trafficking, such as ethics, anti-discrimination, anti-harassment & sensitivity, anti-money laundering, and acknowledgment of the InComm Code of Conduct and Employee Handbook. We are reviewing our curriculum content to ensure it is contemporary and relevant. Modern slavery and human trafficking will be taking into account in that review.

Furthermore, we have taken advice from our English lawyers on the impact of and responsibility for compliance with the UK's Modern Slavery Act. Our legal and compliance team is aware of the provisions of that act and our own policies have been informed by, and have been drawn up to be consistent with, it. We are building our response to a range of corporate social responsibility issues including slavery and human trafficking. The training given to our employees will reflect the development of our response to InComm corporate social responsibility.

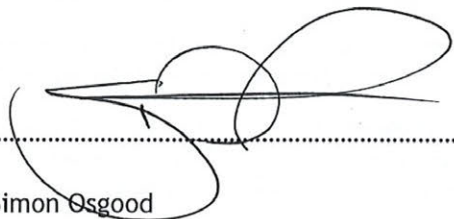
#### Further steps

We understand the importance of promoting good practice in relation to the prevention of modern slavery and human trafficking, both internally and working with our partners.

We will continue to monitor and develop our practices in respect of combatting slavery or human trafficking to target areas of our business if we become aware there is a potential risk of modern slavery. Our legal function is responsible for checking and testing the success of our commitments, and will work to ensure we meet our expectations.

This statement has been approved by our Board of Directors and will be reviewed annually.

Signature



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Name

Simon Osgood  
Director  
InComm Europe Limited

Date

1 / July / 2019