



MODERN SLAVERY AND HUMAN TRAFFICKING TRANSPARENCY STATEMENT 2025

INTRODUCTION

At Checkout.com, we have a zero-tolerance approach to modern slavery.

We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our business or in any of our supply chains.

We expect the same high standards from all of our suppliers and other business partners and we expect that our suppliers will in turn hold their own suppliers to the same high standards.

OUR ORGANISATION

Checkout.com's mission is to enable businesses and their communities to thrive in the digital economy. We are partners, not providers to our clients. Since Checkout.com launched in 2012, we have grown substantially as a business, in terms of both our workforce and our global presence. We now have employees working across over 20 global locations worldwide and each one of us is passionate about helping our merchants worldwide grow through our next-generation payments platform.

POLICIES

We are committed to conducting our business at all times in compliance with all legislation and regulations, which are relevant to our business within the countries that we operate. In keeping with our commitment to act with integrity in all our business dealings, our policies enable us to ensure that there is no slavery or human trafficking in any part of our business or our supply chains.

We expect our suppliers, partners, and merchants to also meet these high standards. Checkout.com has reviewed and kept up-to-date internal policies, instructions, and governance demonstrating our commitment, requiring employees to raise concerns about any identified or suspected non-compliance, and confirming that employees will not suffer any detriment for raising such concerns. These internal policies, instructions, and governance include, but are not limited to, the following:

- ❖ Anti-money laundering and counter-terrorist financing;
- ❖ Conflicts of interest;
- ❖ Code of business conduct;
- ❖ Whistleblowing.

OUR SUPPLIERS

We expect all of our suppliers to review and comply with the obligations set out in our Supplier Code of Conduct. The Supplier Code of Conduct is an indication of our commitment to acting ethically and with integrity in all our business relationships and requires our suppliers to do the same. The Supplier Code of Conduct outlines the principles, guidelines and expectations for establishing and maintaining a business relationship with us. We are committed to partnerships with suppliers that share our dedication to conducting business in a legal, ethical and socially responsible manner.

DUE DILIGENCE AND RISK MANAGEMENT

Before entering into a relationship with a new supplier, partner or merchant, we conduct due diligence exercises to assess the risks of partnering with that supplier, partner or merchant and to provide assurance that the supplier, partner or merchant meets our expectations regarding adequate controls. As

part of these due diligence exercises, we conduct a series of checks that take account of risks including product type and country of origin risk, and financial crime indicators.

Terms & Conditions:

We require our contracts with our suppliers and merchants to 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 with our suppliers and merchants for non-compliance with such laws, regulations, and standards.

Ongoing Monitoring:

We conduct ongoing monitoring of our suppliers and merchants to ensure that they are compliant with their contractual commitments and are delivering products or services by our standards. Suppliers and merchants that present heightened risks may be subject to additional audits or reviews.

PERFORMANCE

We are committed to adherence to the risk management approach and due diligence processes noted in this statement when working with suppliers and merchants. All new employees are required to complete a mandatory conduct training module as part of their onboarding process which refers them to our Supplier Code of Conduct and this statement. This training data is monitored and reported by the People team with the targeted completion of 100% of employees within 90 days of starting employment at Checkout.com.

As part of our commitment to ongoing excellence and compliance, all employees are required to complete a regular refresher course every year to ensure their knowledge and understanding are up to date.

LEGAL BASIS

This statement is issued in accordance with the reporting requirements in place in the relevant countries in which the Checkout.com group operates, including section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth), and applies to the financial year ending 31 December 2025.

BOARD APPROVALS

This statement has been approved by the Boards of Directors of Checkout Payments Group Limited, Checkout Ltd, and Checkout Technology Ltd and has been signed by the Group Chief Executive Officer.

Signed by



Guillaume Pousaz
Chief Executive Officer
Checkout.com