



**Modern Slavery &
Human Trafficking
Statement
for the
Wise Group**



A. INTRODUCTION

Wise Group plc (Wise) is committed to improving its practices to ensure slavery and human trafficking are not taking place in any part of our business. Wise expects the same commitment from our suppliers, contractors and partners.

This statement sets out the steps Wise has taken to meet the requirements under the *Modern Slavery Act 2015* (UK) and the *Australia Modern Slavery Act 2018 (Cth)*. This statement was approved by the Board of Directors of Wise Group plc on 23 September 2026 and it covers both Wise Group plc and its subsidiary Wise Australia Pty Ltd.

B. ORGANISATIONAL STRUCTURE

Wise is a public company incorporated in Jersey and is the ultimate holding company of the reporting entity, Wise Payments Ltd. Wise Australia Pty Ltd ("**Wise Australia**") is registered in Australia (ACN 616 463 855) and is a wholly-owned subsidiary of Wise. Wise also has subsidiaries in several countries globally, as set out in Appendix 1 (collectively, the "**Wise Group**").

The Wise Group's principal activity is to give our customers new ways to move, manage and grow their money, including sending and receiving money abroad.

We move more than £10 (ten) billion globally every month and work across ten (10) key locations around the world. We currently employ over 8,000 (eight thousand) Wisers. None of our work is seasonal, nor do we work in certain sectors that have a higher risk of modern slavery. According to the UK government, these high-risk sectors include care, construction, food and agriculture, logistics or retail and fast fashion. These sectors typically share heavy reliance on vulnerable migrant workers, complex subcontracting supply chains, and weaker regulatory oversight.

Wise is the ultimate parent entity of all entities within the Wise Group. The Board of Wise is ultimately responsible for all relevant entities and ensures that all policies and procedures are sufficiently aligned.

This statement was prepared following input from and consultation with multiple teams such as Legal, Third Party Management, Compliance, Privacy and Risk from across Wise Group, including Wise Australia.

C. OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING

Wise is committed to ensuring that there is no modern slavery or human trafficking in the Wise Group's supply chains or in any part of our business. Wise acts ethically and with integrity in all our business relationships. Wise promotes and implements effective systems to ensure slavery and human trafficking are not taking place anywhere in our business or supply chains.

Wise supports the implementation of the ten principles of the United Nations Global Compact which relate to human rights, labour, environment and anti-corruption, and we support the international agenda to abolish human trafficking, slavery, forced, compulsory and child labour.

D. OUR SUPPLY CHAINS AND RISK ASSESSMENT

The Wise Group has an extensive supply chain in order to power our business and help our customers. We intend to govern all current and future third party relationships with the modern slavery issues in mind. Wise is committed to ensuring



that modern slavery, human trafficking, and forced labour do not take place in our business or supply chains, and we take active steps to avoid engaging with suppliers who violate these standards. We engage a global network of third-party suppliers to support our business operations, with the majority of our supply chain concentrated in lower-risk regions across the UK, Europe and North America. Where applicable, our business also interacts with regulated financial market infrastructure.

We apply a risk-based approach to third-party governance, evaluating modern slavery and human rights risks across both the onboarding stage and ongoing supplier lifecycle. During onboarding, we collect targeted risk data, including the operating jurisdiction, service category and nature of the third-party products or services to establish an initial risk profile. We maintain continuous oversight on our third-party service providers through ongoing monitoring and periodic reassessments, upholding a zero-tolerance stance toward modern slavery, human trafficking and forced labour across our supply chain.

We periodically evaluate our global supply chain to identify and monitor potential modern slavery risks. The majority of the third-party services Wise procures consist of highly specialised, technology-driven, and professional services operating within lower-risk geographies. Consequently, our supply chain presents an inherently lower overall risk profile. Where potential risk factors are identified, such as vendor operations in higher-risk jurisdictions or specific service categories, we apply targeted due diligence and heightened oversight. We maintain a risk-based governance model across all entities, including Wise Payments Limited (UK) and Wise Australia (AU), to ensure our ethical standards are upheld.

During the reporting period, our risk evaluation framework actively assessed our active global supplier base. Through this process, we identified a small, targeted subset of providers presenting an elevated inherent risk profile based on geographic exposure and service categories. Each of these suppliers was subjected to enhanced due diligence incorporating a comprehensive historical lookback review. These assessments yielded a minimal proportion of escalated cases, all of which were thoroughly evaluated, monitored, and appropriately addressed within our overarching Modern Slavery framework. Concurrently, our active supplier network remained subject to continuous, automated screening to ensure real-time risk detection across our operations.

E. DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

At Wise, we implement risk-based controls designed to identify, prevent and mitigate modern slavery and human rights risks across our business operations and third-party relationships, actively monitoring their ongoing impact. These include:

- Modern slavery risk identification and remediation is embedded directly within our overall third-party due diligence framework, spanning both third party onboarding stage and ongoing monitoring of active engagements. During onboarding, we collect key vendor data, such as operating region, service category and the specific nature of the services provided, to assess whether a supplier presents a heightened exposure to modern slavery. If a prospective supplier presents an elevated modern slavery risk, we conduct enhanced reviews and further investigation at the onboarding stage, applying targeted risk mitigations where appropriate before finalising onboarding. Following onboarding, active suppliers remain subject to continuous monitoring and periodic reassessments. If potential issues are identified during active engagement, we apply risk-proportionate oversight to investigate and implement appropriate remediation actions.



- Setting the bar high for the work we do and the way our employees behave. We have a [Code of Conduct](#) that sets out our minimum expectations of all Wisers. We follow internal rules set by our policies and guidelines, and act in line with laws and regulations applicable to us as individuals, as well as to the organisation as a whole. We treat each other fairly, as equals and with respect. We're also clear on how we treat unacceptable behaviour, so we can continue to protect the culture we have built.
- Protecting whistleblowers through our Whistleblower Policy, which provides a confidential avenue for whistleblowers to submit disclosures anonymously if they wish in order to protect their identity.

Wise will not support or deal with any business to whom we know is involved in slavery or human trafficking.

F. SUPPLIER ADHERENCE TO COMPANY VALUES

Wise has a zero tolerance policy to slavery and human trafficking.

To ensure all those in Wise's supply chain and contractors comply with our values, we have in place a supply chain compliance programme. This includes carrying out the due diligence process referred to above to assess the potential level of risk of slavery and human trafficking for new third parties.

G. TRAINING AND POLICIES

Wise operates a robust framework of internal policies and procedures to ensure ethical standards are maintained across our global operations. These policies and procedures allow and encourage Wisers to raise any concerns and for Wise to take appropriate corrective action if necessary, including with respect to slavery or human trafficking.

Wise is committed to addressing modern slavery risks through active supplier engagement and responsible governance. When potential concerns are identified within our supply chain, we apply a phased escalation process. We first implement enhanced vendor engagement, placing the third party under heightened oversight and monitoring. Where possible, we then focus on corrective action, collaborating with the supplier to address and remediate the underlying issues. However, if a supplier fails to demonstrate meaningful progress or take appropriate corrective steps, Wise will initiate a process of responsible disengagement.

To ensure robust oversight of modern slavery risks, Wise Australia views board training as a core element of its governance and due diligence framework, directly aligning with statutory reporting guidance. During the reporting period, we implemented a dedicated modern slavery training module for the Wise Australia Board. This initiative ensures leadership can demonstrate the required capacity to evaluate modern slavery risks and hold the organisation accountable to its due diligence commitments.

H. ONGOING ASSESSMENT

On an annual basis, our senior management delegates a review of the effectiveness of the processes we have in place within the Wise Group to assess and address modern slavery and human trafficking risks.



I. MEASURING EFFECTIVENESS

For a purpose of the *Modern Slavery Act 2015* (UK) and the Australian *Modern Slavery Act 2018* (Cth) and ensuring that slavery and human trafficking is not taking place in our business or supply chains, we measure effectiveness by following:

- Effective deployment of internal training and whistleblowing policies and procedures, ethics, disciplinary implementation.
- Within our supply chain, we evaluate the effectiveness of our modern slavery risk controls on an ongoing basis using key qualitative and governance indicators. We measure our ability to maintain comprehensive, real-time visibility over our third-party ecosystem, ensuring our screening capabilities reliably surface elevated inherent risks across operating jurisdictions and service categories.
- We periodically review and update our risk evaluation methodologies and assessment criteria to ensure our controls remain aligned with evolving regulatory standards, geopolitical shifts, and emerging human rights risks.
- We monitor the efficiency and consistency with which identified supply chain issues or adverse indicators are investigated, oversaw, and appropriately remediated.

DocuSigned by:

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Name: Kristo Käärmann

Title: Director



APPENDIX 1: REPORTING ENTITY SUBSIDIARIES LIST

Requirement	Response
Reporting Entities	Wise Payments Limited Wise Australia Pty Ltd
Reporting Entity's subsidiaries (in alphabetical order) ¹	279 NEWCO Inc PT Wise Payments Indonesia Vaho Forex Private Limited Wise Asia-Pacific Pte. Ltd. Wise Assets Canada Inc. Wise Assets Europe AS Wise Assets Hong Kong Limited Wise Assets Japan K.K. Wise Assets New Zealand Limited Wise Assets Nominees Ltd Wise Assets UK Ltd Wise Australia Investments Pty Ltd Wise Brasil Corretora de Câmbio Ltda. Wise Brasil Instituição de Pagamento Ltda. Wise Chile SpA Wise China Ltd Wise Digital Assets FZCO Wise Digital Brasil Ltda. Wise Europe SA Wise Financial Services Hong Kong Limited Wise Financing plc Wise Fintech Network LLC Wise Global Holdings Limited Wise Global Limited Wise ILS Ltd Wise India Services Private Limited Wise Investments Holdings Ltd Wise Malaysia Assets Sdn. Bhd. Wise NewCo Holdings Limited Wise NewCo Limited Wise Nuqud Ltd Wise Pagos México, S.A. de C.V. Wise Payments (Thailand) Limited Wise Payments Arabia JSC Wise Payments Canada Inc. Wise Payments Europe B.V. Wise Payments Holdings (Thailand) Limited Wise Payments Hong Kong Limited Wise Payments India Private Limited Wise Payments Japan K.K. Wise Payments Korea Limited Wise Payments Malaysia Sdn. Bhd. Wise Payments New Zealand Limited Wise Payments Nigeria Limited Wise Payments South Africa (Pty) Ltd Wise Payments Teknoloji Anonim Sirketi Wise Pilipinas Inc.



	Wise Singapore Assets Pte. Ltd. Wise Switzerland AG Wise US Assets Inc Wise US Holdings Inc Wise US Inc
Structure, operations and supply chains	See Sections A, B and D.
Risks of modern slavery practices in the operations and supply chains	See Section D.
Actions taken to assess and address such risks	See Section D (fourth and fifth paragraphs), E, F and C (first paragraph).
Assess the effectiveness of such actions	See Section E (first paragraph) and I.
Process of consultation	See Section B.
Approval by the principal governing body	See Section A (second paragraph).

¹ Wise Group plc (the reporting entity for the Modern Slavery Act 2015 UK) controls the additional entities: Wise Payments Ltd, TINV Europe AS, TINV Ltd and TINV Nominees Ltd.