



## **EURONET PAYMENT SERVICES LIMITED**

### **Modern Slavery and Human Trafficking Statement**

## Introduction

The Modern Slavery Act 2015 (the "**Act**") requires certain commercial organisations to set out the steps that they have taken during the previous financial year to ensure that modern slavery and human trafficking are not taking place within any part of their business or any of their supply chains.

This Modern Slavery Statement is made pursuant to section 54(1) of the Act and constitutes our statement for the financial year ending 31<sup>st</sup> December 2023.

## Our Business

Euronet Payment Services Limited ("**EPS**") is an Authorised Payment Institution in the United Kingdom (FRN 504630), Authorised by the Financial Conduct Authority and is part of Euronet Worldwide ("**Euronet**") listed on the NASDAQ.

EPS business, operating under the Ria Money Transfer brand, consists of delivering our customers' hard-earned money straight into the hands of those who need it most through our stores, digital platforms, and agent network locations. By providing our customers with a fast, convenient, and safe service, we get money to where it matters with the help of our groups interconnected global network formed by correspondents, financial institutions and local banks. We contribute to helping communities, families, and individuals get ahead.

## Our Policy and Approach

The Code of Business Conduct and Ethics Charter ("**The Code**") sets forth our core values and applies to all employees in the Euronet group. It provides guidelines on the required standard of ethical conduct in various situations and specific corporate policies governing the conduct of its business, including in relation to:

- Anti-bribery and corruption. The policy reinforces the standards of behavior expected of our employees in their dealings with third parties together with our commitment to conducting business with the highest standards of integrity and ethics;
- Whistleblowing which aims to encourage employees to raise concerns, including about how they are treated or practices within our business or supply chains, without fear of reprisal; and
- Money laundering prevention. Following laws against money laundering which prohibit the acceptance or processing of the proceeds of criminal activities and is committed to fully comply with these rules and will only conduct business with reputable customers whose funds are derived from legitimate sources.

EPS is trusted by its customers to perform remittance services across the globe and works thoroughly to avoid its service to be used by those willing to use it for the wrong purposes. Legal and Compliance functions are vital to the overall success of the Company and provide assurance for its customers that their money will be delivered in the securest of ways. Senior Management has consciously made a commitment to maintain the highest standards in the industry and have created a strong compliance culture throughout the organisation.

EPS has a zero-tolerance approach to modern slavery and human trafficking in any form. It expects employees, agents, partners, customers and suppliers to comply with these values and is steadfast in reinforcing that no modern slavery and human trafficking practices should take place in any part of its business.

In addition to the Code, EPS has an Anti-Money Laundering and Counter Terrorist Financing Compliance Program that sets the principals for preventing EPS services from being used for illicit purposes. EPS applies rigorous agent onboarding, know your customer due diligence, transaction screening, real-time and post-transactional monitoring, as well as a thorough oversight through continuous review of the interactions of its customers and agent network to ensure that it is able to identify a payment associated with illegal activity and report it to the relevant authorities.

EPS policies, procedures and controls help detect, deter and report suspicious activity involving modern slavery, among other typologies.

### **Steps we take in our business to address Modern Slavery**

EPS has implemented risk-based policies, procedures, and controls to adequately comply with established laws and regulations to avoid being used as a vehicle of modern slavery and human trafficking among other risks.

Such policies, procedures and controls are designed to mitigate the potential risks throughout the remittance process from beginning to end, this includes:

- An effective agent on-boarding process to evaluate the suitability of agent's directors, employees, and premises to provide remittance services on behalf of EPS.
- A thorough agent oversight program which involves agent activity analysis, risk level assignment and audits to evaluate if they are in compliance with the applicable regulations, EPS compliance program and reinforce their compliance responsibilities.
- Analysis of agents, and customers behavioral patterns to identify potential existing risks, surfacing of new trends or proliferation of existing risks such as modern slavery or human trafficking in corridors where these were not existent. This level of analysis assists the EPS Compliance team to identify increasing risks and implement procedures and controls that mitigate or avoid such risks.
- A team of specialized analysts, with the assistance of internal detection systems, that are capable of monitoring and controlling transactions that are deemed suspicious, allowing the necessary actions to be taken to avoid illicit funds to reach their final destination. Such controls include sanctions and PEP screening and regulatory, threshold, agent/customer/beneficiary behavioral filter alerts, both in real-time and post-transactional.
- Risk based due diligence processes for the onboarding and monitoring of EPS supply chains.
- EPS offers money transfers across the globe through a correspondent agreement with Continental Exchange Solutions Inc (CES) - CES is a company owned by the Euronet group. EPS leverages on CES procedures for the onboarding and ongoing oversight of such correspondents. Including negative media searches to identify if correspondents have links to modern slavery and human trafficking.
- All employees and agents are trained and tested on anti-money laundering, terrorist financing, fraud prevention, modern slavery, human trafficking detection and prevention, and the reporting of

suspicious activity. Relevant training courses are rolled out to employees throughout the year.

- Continue to monitor UK Home Office, Law enforcement and other Competent Authorities for information on new and emerging Modern Slavery risks relevant to EPS.

### **Our Future Plans**

EPS pledges to combat human trafficking and modern slavery in any form and will continue to assess and improve its efforts. Ongoing measures include;

- obtaining formal confirmation from new suppliers that no slavery or human trafficking is used within their business or supply chains;
- continue to train employees and agents on how to identify, prevent, and report potential signs of human trafficking and modern slavery;
- continuing to maintain open communication lines with law enforcement and non-governmental organisations in the fight against modern slavery.
- continue to monitor agents, customers and beneficiaries behaviors throughout the different corridors we serve and improve analysis methodologies to better identify modern slavery and human trafficking red flags.

### **Approval**

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 of the United Kingdom and constitutes EPS's modern slavery and human trafficking transparency statement for the year ended 31<sup>st</sup> December 2023, and was approved by the Board of Euronet Payment Services Limited for publication on 13<sup>th</sup> May 2024.



**Jose Ivars-Lopez**  
Managing Director