

## 2020 Modern Slavery and Human Trafficking Transparency Statement

This statement is pursuant to section 54 (1) of the Modern Slavery Act 2015 (the 'Act') and constitutes ECOMMPAY's statement of transparency for the financial year ending 31 December 2020. Article 54 of the Modern Slavery Act 2015 came into effect on 29 October 2015 and requires certain companies to provide information regarding the steps taken to prevent slavery and human trafficking from occurring within their business and supply chain. ECOMMPAY is committed to conducting its business ethically and with integrity, and this statement sets forth the steps we have taken to ensure that modern slavery does not occur within our business activities.

ECOMMPAY has a zero tolerance of slavery, forced labour or servitude and human trafficking. We recognise our responsibility to:

- Continuously review the steps we take to combat modern slavery and human trafficking;
- Review our suppliers to ensure they use fair and ethical labour practices;
- Make it clear that we expect all of our employees and suppliers to act with integrity.

### **Our business and supply chain**

ECOMMPAY offers payment services to merchants, along with various payment methods, enabling them to accept payments from users anywhere the world in any currency. In vast majority of cases we rely on products or services provided by the companies located in the EU.

We do not manufacture goods, operate factories or handle raw materials or commodities. We do however source products and services from various suppliers located in the EU, as well as outside the EU. Our main supply chain categories primarily include IT and marketing services.

### **Our policies**

We are committed to upholding the highest ethical standards in all of our business activities. In connection with this commitment, we have adopted a policy outlining the employee ethics and conduct standards. It sets out the internal policies, which all of our employees are required to follow in the course of their employment with us. The Code outlines our commitment to ensuring that all our employees act in ethical manner and with integrity and are treating everyone with respect and dignity. We recognise the importance of our employees' continuing success and believe that our success as a payment service provider depends on all of us upholding the highest professional and ethical standards and treating all individuals with due respect.

### **Our due diligence processes**

Prior to entering into a contract with a new supplier or partner, we conduct due diligence in order to assess the risks of partnering with that supplier or partner and to obtain assurance that the particular supplier or partner meets our standards.

## **Training**

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Upon completing our training programme, employees are encouraged to identify and report any potential violations.

A handwritten signature in black ink, appearing to read "Paul Marcantonio", written over a horizontal line.

Paul Marcantonio

December 2020