GoCardless

HUMAN RIGHTS AND MODERN SLAVERY STATEMENT

For the financial year ending on 30 June 2024

About GoCardless

GoCardless is a global bank payment company. We help more than 85,000 businesses, from start-ups to household names, collect both recurring and one-off payments, without the chasing, stress or expensive fees. Each year GoCardless processes more than US\$35 billion of payments across 30+ countries. Our acquisition of Nordigen means we're also helping businesses make faster and more informed decisions through easy access to bank account data.

We are headquartered in the UK, with additional offices in Australia, France, Latvia and the United States. In the UK, we operate through a legal entity called GoCardless Ltd (company registration number 07495895). This legal entity is registered at Sutton Yard, 65 Goswell Road, London, England, EC1V 7EN and is authorised by the Financial Conduct Authority ("FCA") to provide payment services (FCA registration number 597190).

Why do we need to make this statement?

The intention of UK Modern Slavery Act 2015 (MSA) is to address slavery, urging organisations to prevent modern slavery within their operations. Additionally, Section 54 of the MSA mandates that commercial entities meeting specific criteria, such as operating in the UK and surpassing a global turnover of £36 million, must publish an annual anti-slavery and human trafficking statement. GoCardless is dedicated to combating slavery and commits to preventing any involvement in, facilitation of, or support for human trafficking or slavery within its operations. This statement serves to confirm our compliance with the MSA, reiterate our stance on modern slavery, and outline the measures we undertake to ensure that our approach is effectively implemented. While this statement is required in the UK, our practices remain consistent worldwide.

Our Approach to Human Rights and Modern Slavery

GoCardless has a number of controls in place to make sure that we do not engage in activity which may go against our stance on human rights or modern slavery. Some of these are outlined below.

GoCardless uses a number of suppliers which provide professional services such as legal advice, consultancy services and accounting services. We also use suppliers who provide hardware and software, including computer equipment, software licences, verification services and cloud-based data storage services. The majority of our suppliers are located in the same locations as our offices - Europe, North America and Australia.

As an internet-based payment technology business, with the majority of our suppliers being software and professional service providers, our human rights and modern slavery risk profile is relatively low. Nevertheless, all suppliers are subject to our Supplier and outsourcing policy. This requires that all vendors are vetted and subject to due diligence which varies depending on their risk categorisation.

GoCardless also serves over 85,000 merchants. The majority of these are located within low or medium risk geographies and are subject to due diligence to ensure that they are within the risk appetite of the company. Only a small proportion of our active merchant portfolio are located in high risk geographies, and in most cases, these merchants are subject to enhanced due diligence.

One of our four <u>core values</u> is to act with integrity. This permeates everything we do as a company, including how we act in our business relationships. This means we will protect and maintain all internationally recognised human rights with respect to our 750+ employees, the communities in which we operate, and the communities within which our supply chains operate globally. If GoCardless detects that a party which it has a relationship with is committing human rights or modern slavery offences we will terminate our relationship with the entity immediately.

Human rights and modern slavery concerns about any of our suppliers, merchants or other parties can be reported to us via the <u>support centre portal</u> and we promise to investigate these fully.

GoCardless Limited's Board of Directors reviewed and approved this statement and, as a declaration of our commitment to address and prevent modern slavery within our business and our supply chains, Hiroki Takeuchi signed this statement on the behalf of the Board of Directors.

Hiroki Takeuchi Founder & Chief Executive Officer GoCardless Ltd.