

Modern Slavery and Human Trafficking Statement

July 2023

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015, and conveys the steps taken by GlobePay Limited (“GlobePay”) to prevent modern slavery and human trafficking in its supply chains and business operations. GlobePay reviews and updates its statement annually, and this version correlates to the period beginning 1 August 2023 to 31 July 2024.

GlobePay is a FCA-regulated company that provides payment processing services and solutions, enabling its customers to run their businesses effectively and efficiently. GlobePay currently provides processing and settlement in multiple currencies and enables merchants in the UK and Gibraltar to accept cross-border payments methods.

GlobePay is committed to preventing slavery and human trafficking in our corporate activities and ensuring that our supply chains are free from the same.

Our Organisation

As part of the payments industry, GlobePay recognises that we have a responsibility to take a robust approach to slavery and human trafficking.

The company currently is based in the UK. Our headquarter is in London. We ensure that all employees and contractors we work with are compliant with IR35.

Our Suppliers

GlobePay has adopted a risk-based approach in reviewing our supply chain, which complies with legal requirements. Due to the nature of the services we provide, our supply chains are relatively straightforward: the majority of services operate within the UK.

We collect and hold all supplier relationships and risk assesses them. These risks are then overseen and actioned by the Compliance Department. While GlobePay will always conduct a more detailed risk assessment of any business sectors or geographies where a greater risk of modern slavery or human trafficking could occur, we believe that the risk of slavery and human trafficking issues in our supply chain is low.

Our Policies

Whistleblowing Policy: All GlobePay employees are encouraged to report any concerns related to the direct activities or the supply chains of our organisation, including

circumstances that could give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedures are designed to make it easy for workers to make disclosures without fear of retaliation. We maintain employees' confidentiality as far as possible and allow employees to raise concerns anonymously if they prefer.

Employee Handbook: We strive to maintain the highest standards of employee conduct and ethical behaviour, and GlobePay' Handbook makes clear to employees the actions and behaviour expected of them when representing our organisation. Our leadership team drives a workplace culture that is protective and dutiful of our employees' human rights.

Recruitment Policy: GlobePay aims to recruit and onboard new employees directly through our careers page, LinkedIn, and other recognised specialist platforms and channels. Our internal People Team manage the application and selection process with the hiring manager. In the event that we need a specialised skillset, which is more challenging to source directly, GlobePay will engage with specified, reputable employment agencies to source labour and we always verify the practices of any new agency before accepting workers from that agency.

GlobePay ensures that open and transparent relationships are built with all prospective candidates – whether sourced directly or via an agency. We believe this approach enables the company to spot signs of any modern slavery and to act. GlobePay conducts thorough background checks on all employees, including credit, criminal, employment history, and identification checks.

As part of its approach to internal and supply chain management, GlobePay has put in place the following systems and controls:

Policies: Human Resource and Compliance Department are responsible for implementing and reviewing all people and compliance policies. Policies are created in line with the industry best practice, under the advice of compliance and employment experts, and reviewed annually.

Training: Our team ensures that mandatory e-learning is completed by all staff. The objective of this training is for all staff to understand and respond to identified slavery and human trafficking risks. We continue to raise awareness of modern slavery issues through ongoing employee communication.

Due diligence: GlobePay undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers through our policies, procedures, operating controls, and the way we lead and govern the company.

Looking Ahead

As GlobePay evolves and grows, we plan to continually review our practices and procedures to ensure continued compliance with UK legislation. We are passionate about creating a culture of individual accountability when it comes to our compliance responsibilities and this is echoed in all policies, training, and procedures. We combat human trafficking and modern slavery at every stage, through our governance and decision-making process.

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GlobePay understands that combatting modern slavery and human trafficking is a long-term effort, and we will continue to give appropriate thought, monitoring and governance by reviewing our people and compliance policies, procedures, training, and monitoring practices.

This Statement was approved by the Board of Directors of GlobePay Limited

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Xuejiao Hu

Chief Executive Officer