

Statement on Modern Slavery and Human Trafficking

SurePay Group

January 2026

Index

| | |
|------------------------|---|
| Introduction | 3 |
| Background information | 3 |
| Our Commitment | 3 |
| Responsibility | 4 |
| Conclusion | 4 |

1 Introduction

This statement applies to SurePay B.V. and SurePay Ltd (collectively "SurePay"). Modern slavery and human trafficking ("MSHT") are violations of fundamental human rights and are offences under the Modern Slavery Act 2015¹ ("MSA 2015"). SurePay has a zero-tolerance approach to MSHT and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to seek to ensure that neither slavery nor human trafficking is taking place in its business or in any of its supply chains.

This statement is published by SurePay pursuant to section 54 of the MSA 2015 and is for the financial year ending 31/12/2026.

This statement outlines the practices and procedures we have in place to ensure our business and supply chains remain free of MSHT.

2. Background Information

SurePay is a tech service provider with clients in the financial sector and beyond. The tech service (bank account-verification service) supports the payment process of its clients. The tool is not payment means or a payment instrument but it allows the payer to verify whether the received data (e.g. name and bank account number) about a payee matches with the data registered for that payee.

The service clarifies whether the intended receiver is the right receiver of a payment with a 'match/no match' and enables customers to make safer payments. The combination of curiosity, enthusiasm and determination made SurePay grow to the company it is nowadays: a market leading provider of bank account-based verification services that has a positive impact on society, by preventing misdirected payments and fraud helps to prevent payment fraud and misdirection. The company is on a mission to make its customer's payments easier, more personal and even more secure by offering technology solutions to banks, corporates and institutions all over Europe.

3. Our Commitment

SurePay is committed to maintaining a high standard of integrity and professionalism and ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. We have a zero-tolerance approach to MHST and have developed internal policies to help ensure the continuous prevention of MSHT among our subcontractors.

¹ Modern Slavery Act 2015, <https://www.legislation.gov.uk/ukpga/2015/30/contents>

Such policies and procedures, which include, among others, the:

- POL-04 Supplier Security Policy
- POL-019 environmental, social & governance policy;
- POL-020 Integrity Policy

ensure that there is rigour and transparency in our business operations and in our approach to preventing MSHT.

4. Responsibility

At all times SurePay's Management Team will be responsible for the risks related to business practices and business conduct, assuring all employees are aware of the content of the internal standards, procedures and applicable regulations with regards to sound business practices and good business conduct.

The responsibility to meet the agreed standards as stated in the Integrity policy, the underlying policies and procedures and the SurePay Code of Conduct, applies to everyone who works at SurePay: temporary and permanent staff members, freelancers, directors and team leads.

5. Conclusion

Due to the nature of SurePay's business and its approach to governance, SurePay has assessed that there is currently a low risk of MSHT in its business and supply chains.

Nevertheless, SurePay will continue to monitor and review the effectiveness of its relevant policies and procedures and will conduct regular checks on their effectiveness in helping combat MSHT.