



Local Policy

Modern Slavery and Human Trafficking Statement

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Policy Owner

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REVISION HISTORY

Version	Approval	Date	Description	Author
1.0	BOD	03-09-2025	Initial Release	Navin Mandla
2.0	BOD	12-11-2025	<p>Policy Owner: Changed policy owner and date last updated.</p> <p>Policy Context: Added an overview of Shift4 Payments UK Limited, a statement on Shift4's commitment to preventing slavery and human trafficking, and more detail on supply chain context.</p> <p>Detailing Approach: Introducing principles and actions taken by Shift4 Payments UK Limited and clarifying risk assessment and mitigation processes.</p> <p>Strengthening Governance: Incorporating a new section on Code of Conduct and Training.</p> <p>Improving Structure: Linking to other relevant policies and updating the sections on Policy Review and Updates.</p>	Samantha Miranda

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Overview

Shift4 Payments UK Limited is part of the Shift4 Group, a global leader in integrated payments and commerce technology, providing a complete end-to-end solution for businesses worldwide. Shift4's platform handles every aspect of the commerce ecosystem—including in-person payments, online payments, and mobile solutions—to deliver a seamless and secure experience. It powers top brands across various industries, including Lodging & Hospitality, Food & Beverage (via solutions like SkyTab POS), Retail, and Sports & Entertainment, while committing to the highest standards of security and ethical operation.

Our commitment to the highest ethical standards guides every aspect of our business, from our technology to our relationships with all stakeholders.

Our Commitment

Shift4 Payments UK Limited is a leading provider of payments processing technology committed to upholding the highest ethical standards in all corporate activities—with customers, suppliers, employees, and other stakeholders.

As modern slavery and human trafficking are serious violations of human rights and are illegal (Modern Slavery Act 2015), we have a zero-tolerance approach to these practices. Modern slavery includes servitude, forced, and compulsory labor, all of which exploit a person for commercial gain. We will not knowingly support or do business with any organization involved in these crimes. Although there is always a risk of exposure through business operations or supply chains, we are fully committed to preventing these practices and are dedicated to acting ethically and with integrity across all business dealings.

This annual statement is published to comply with legislation requiring commercial organizations of a certain size to report on the steps taken to ensure modern slavery is not taking place in their business or supply chains.

Principles and Actions

- **Zero Tolerance:** We maintain a zero-tolerance stance against modern slavery and human trafficking.
- **Risk Assessment:** We regularly assess the risk of modern slavery in our operations and supply chains.
- **Due Diligence:** We conduct due diligence on suppliers to ensure they share our commitment to ethical practices.

- **Training:** We provide training to employees to raise awareness of modern slavery and how to identify and report potential risks.
- **Reporting:** We encourage employees and stakeholders to report any concerns about modern slavery without fear of retaliation. We have a Whistleblower channel, accessible to all employees, ensuring confidentiality and protection of Whistleblowers.
- **Remediation:** We will take appropriate action, including working with suppliers to address issues, or terminating relationships, if modern slavery is identified.
- **Transparency:** We are committed to transparency in our operations and supply chains, and we regularly review and update associated policies and procedures.
- **Collaboration:** We work with relevant stakeholders, including law enforcement and other organizations, to combat modern slavery as required.

Risk Assessment and Mitigation

As part of our commitment to **never be complicit in human rights abuses**, we maintain robust risk assessment practices to proactively identify Modern Slavery concerns.

We utilise a **risk-based approach** to evaluate the overall risk profile of our operations and supply chains. This assessment currently considers several critical factors, including:

- **High-risk industries** (sectors most vulnerable to exploitation).
- **High-risk countries** (geographies with weak legal enforcement or high poverty).
- **High-risk business models**, such as outsourcing work to third parties or the use of contingent workers.

By referencing these factors, we can strategically focus our efforts to ensure we meet our commitment.

Our Supply Chains

Shift4 Payments UK Limited acknowledges that all supply chains carry a potential risk of modern slavery and human trafficking. However, given that the majority of our products and services are technology-focused and sourced from similarly technology-centric professional suppliers, we assess the inherent risk within our direct supply chain to be minimal. Nevertheless, we hold all our suppliers to the same high standards of ethical conduct, requiring them to implement their own rigorous measures to prevent modern slavery and human trafficking in their operations.

Nevertheless, we maintain robust controls. Our procurement process uses a risk-based vetting approach before any business relationship begins, ensuring our suppliers adhere to the same high ethical standards we uphold. Our Third-Party Risk Management Program ("TPRM") is the core of our vendor oversight. This program establishes the principles and governance structures

we use to proactively identify, assess, monitor, and mitigate risks associated with all our vendors. Every vendor must complete a mandatory risk assessment before being engaged and on a periodic basis afterward.

This assessment explicitly includes due diligence related to Modern Slavery. Our contracts generally require all vendors to:

- Contractually agree to comply with all laws related to Modern Slavery.
- Affirmatively agree not to engage in Modern Slavery practices.
- Conduct their own due diligence of their supply chain.

Any Modern Slavery concerns identified during the initial assessment or ongoing monitoring are promptly escalated to management and tracked through to complete remediation. We ensure our due diligence practices continuously meet industry best practices.

Policies in Relation to Modern Slavery

Supporting Policies: Our commitment is supported by (but not limited to) the current policies listed below; these are regularly reviewed.

- **Whistleblowing Policy:** Provides a confidential mechanism for employees, suppliers, and other stakeholders to report any concerns about malpractice, including modern slavery, without fear of retaliation.
- **Code of Conduct/Ethics Policy:** Defines the ethical standards and expected behaviors for all employees, covering compliance with all laws, including those relating to human rights.
- **Recruitment Process:** Includes employee handbook and robust checks (e.g., right-to-work, identity verification) to ensure all employees are legally entitled to work and are not being exploited.
- **Financial Crime Policy:** Includes industry checks which specifically cater to Modern Slavery risk within our client base (e.g., adult industry checks)

Code of Conduct

At Shift4 Payments UK Limited, we ensure all employees are treated with respect, honesty, and due consideration for their well-being. Our internal policies are grounded in core principles, specifically aligning with international standards on human and labour rights:

- **Ethical Code:** Our Code of Ethics applies to all staff, setting clear expectations for legal and ethical conduct in all job duties.
- **Zero-Tolerance for Abuse:** We are committed to supporting and respecting human rights and ensuring that we are never complicit in human rights abuses (aligning with UN Global Compact Principles 1 & 2).

- **Labour Standards:** We strictly adhere to principles requiring the elimination of all forms of forced and compulsory labour and the effective abolition of child labour (Principles 4 & 5).
- **Whistleblowing Policy:** Our policy actively encourages all staff to report any improper practices, including human rights violations like modern slavery, on an anonymous basis and without any fear of retaliation. All reports are investigated, and appropriate action is taken.

Training

In addition to ensuring that our internal policies and procedures are accessible, understood and applied by all our staff, Shift4 Payments UK Limited also offers its employees continuous learning opportunities relating to, amongst others: financial crime, anti-bribery and corruption, code of conduct, in order to raise the understanding of the importance of conducting our business in a legal and ethical manner.

Review and Updates

Shift4 Payments UK Limited will conduct a periodic review to assess our Modern Slavery risk profile and the effectiveness of our established controls. This cross-entity assessment includes a review of:

- Any recent business changes that may impact our Modern Slavery risk profile.
- The effectiveness of our training materials and employee awareness programs.
- The integrity of our supplier risk assessment process related to modern slavery.
- The relevance and completeness of our Modern Slavery policies and procedures.

This periodic review is a core part of our commitment to continuous improvement in managing this critical risk.