Modern Slavery and Human Trafficking Statement for the Financial Year 2023

Introduction

Stored Value Solutions UK Limited ("SVS") understands the importance of conducting our business ethically and we place the same expectations on our supply chain.

This statement is made on behalf of SVS, pursuant to section 54 of the Modern Slavery Act 2015 ("Act") and sets out the steps we are taking to eliminate Modern Slavery from within our operations and supply chain.

We seek to reassure our customers, partners, investors and employees that Modern Slavery, including forced labour and human trafficking, has not unknowingly found its way into our supply chains. This statement is reviewed and, where necessary, updated prior to each new financial year to evidence SVS’ continuing commitment to our obligations under the Act.

Our Business

SVS has a registered office at Suite 2B, West One, 100 Wellington Street, Leeds, LS1 4LT, England, UK and has approximately 18 employees.

SVS is owned by Stored Value Solutions International B.V. (Netherlands) which is ultimately owned by FLEETCOR Technologies, Inc.

Our Approach to Modern Slavery and Human Trafficking

SVS is committed to adhering to and complying with the Act and does not knowingly employ or condone the use of forced labour, including child labour or bonded labour.

Recruiting of new employees includes identity, right to work and residency status checks to ensure potential employees are identified effectively using official forms of identification. These background checks form the basis of SVS being able to make an offer of employment to individuals who are successful during the
SVS recruits for full-time, part-time, temporary and fixed term positions.

Temporary workers are utilised within the business during periods of increased workload. However, all employees are onboarded into the business using the same defined policy and process as permanent employees and contractors.

Currently, SVS does not provide standalone Modern Slavery training or related materials to its employees. Notwithstanding, SVS has adopted a number of supporting policy documents that highlight the company’s approach and expected standards. The current policies include but are not limited to:

- FLEETCOR UK Responsibility and Sustainability Policy
- FLEETCOR Code of Business Conduct and Ethics
- FLEETCOR UK and Europe Whistleblowing Policy

Training and awareness is achieved through our on-boarding process and refreshed annually through training and internal communications; training includes an assessment to demonstrate understanding. Training completion rates are monitored and reported upon by the Compliance Department throughout the year.

Through our whistleblowing policy staff have the opportunity to report unethical or illegal behaviours, such as Modern Slavery, through anonymous reporting to the Director of Compliance. Our Director of Compliance will independently investigate any report submitted.

We have had no concerns raised by our employees regarding Modern Slavery throughout 2022.

Fleetcor’s Legal and Compliance Departments, including the UK Director of Compliance, remain aware of updates made to the Modern Slavery Act 2015 guidance and various sources are utilised throughout the year to monitor any changes or updates that may be required in line with the legislation. Sources such as HM Government UK Annual Report on Modern Slavery and National Crime Agency National Strategic Assessment amongst others, are utilised for this purpose. SVS also evidences adherence to the legislation by uploading its annual Modern Slavery statement to the Government-run online Modern Slavery statement registry;
Due Diligence

The nature of our business, predominantly a gift card processor, is such that our supply chains are short and assessed as low risk. As a business, we are not directly responsible for the manufacture of goods. The production of gift cards is outsourced to suppliers who have their own policies, procedures and Modern Slavery statements relating to their provision of the services.

We continue to carry out due diligence on our supply chain to ensure that our oversight is suitable and sufficient and matches the low level of risks we identified from our formal risk assessment.

More recently, SVS has considered the implications of the current crisis events in Ukraine which has seen a large scale displacement of people from Ukraine across the UK and Europe. In addition to this, there continue to be high numbers of illegal migrants arriving into the UK across the English Channel. Further to this, the current cost of living crisis in the UK is seeing an increase in individuals experiencing financial hardship. These events may see the impacted individuals being at increased risk of exploitation due to their increased vulnerability.

Our existing approach to Modern Slavery and Human Trafficking assists in minimising the risk of these scenarios occurring within the business and our supply chain, but is something SVS continues to remain mindful of albeit these crises events do not present an immediate or significant risk impact to Stored Value Solutions UK Limited.

Risk Management / Risk Assessment

The nature of our business and our supply chain is a relatively simple model, which allows us to assess the risk of potential Modern Slavery offences taking place as low. However, SVS remains committed to ensuring Modern Slavery does not find a way into any existing, or future, supply chain relationships. The SVS business is supported by its Legal Department which works closely with the Compliance Department, including the UK Director of Compliance, and are responsible for ensuring SVS’ contracts require that customers and suppliers meet
its expectations and standards where the potential for Modern Slavery risk is identified.

**Key Performance Indicators (KPIs)**

SVS does not currently consider its suppliers to be vulnerable to pressures around service level agreements, pricing and cost reduction. However, we remain mindful of how these areas, amongst others, can leave a business vulnerable to the risks of Modern Slavery, and we continue to monitor the impact of service level agreements on our suppliers. Whilst not identifying the need for KPIs to monitor performance we are committed to regularly monitoring and reviewing our supply chain to ensure our assessment remains valid.

**Summary**

Modern Slavery, human trafficking and forced labour continue to be one of the great human rights issues of our time. With thousands of victims of this crime throughout the UK alone, it is critical that businesses act responsibly and work collaboratively to support the aspiration of eradicating this criminal activity from our society.

SVS remains committed to ensuring its full compliance with its legal and moral obligations in relation to Modern Slavery and continuously monitors its practices and policies to identify areas of potential improvement or any significant changes in our risk profile.

We formally assess our approach to Modern Slavery Act requirements through an annual risk assessment, carried out by the Director of Compliance. The assessment concluded that the operations, services and products supplied by Stored Value Solutions UK Limited had no substantive risk profile.

Mark Vogt

**Director**

**Stored Value Solutions UK Limited**

**Dated: November 7, 2023**