

dnapayments



Policy Document

DNA Payments Group – Modern Slavery

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1 Modern Slavery Policy

1.1 Purpose

Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which deprives victims of their liberty and usually involves financial exploitation.

At DNA Payments Group we conduct our business fairly, ethically and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human trafficking, both in our business and in our supply chains. We will not tolerate it.

You are required to read and comply with this policy if you work for, or on behalf of the Company in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider. Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and the Company. It could also involve other legal steps being taken against you.

1.2 Preventing slavery and human trafficking in our business

DNA Payments Group makes appropriate employment checks on all colleagues. No deposits, money or personal documents are required as a condition of employment. Wages, benefits and working hours comply with UK law (e.g., National Minimum Wage, Working Time Regulations). We comply with all legal obligations to ensure the health and safety of all of our colleagues and workers.

1.3 If you are one of our Suppliers

If you supply the Company with goods or services, you must assess your business and supply chains and confirm to our CEO that you comply with your legal obligations, in relation to Modern Slavery, and are committed to ensuring there is no slavery, forced labour or servitude, child labour or human trafficking taking place in your business, or any of your supply chains. You must also provide a copy of your anti-slavery policy.

If you breach this policy or are found to have slavery or human trafficking in your business, or knowingly in your supply chain, the Company may terminate the contract with you and pursue legal action against you.

1.4 If you are an Employee or Worker providing services for us

DNA payments have several policies that support and reinforce our commitment to ethical and legally compliant business conduct, promote ethical values and are designed to support equal opportunities and a harassment-free working environment. These include our DEI Policy, Bullying and Harassment Policy, and Whistleblowing Policy. The People Director is responsible for the oversight and enforcement of these policies and reports directly to the CEO.

You must immediately report any suspicions of Modern Slavery or human trafficking in our business or supply chains to our CEO or via our Whistleblowing policy. Our CEO will investigate, along with our Board of Directors, within a reasonable time, on actions which may require to be taken.

You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately inform our CEO and if you are an employee, refer to our Grievance and Whistleblowing Policies.

Signed by:



SignedDED77719DAD749D...

Colin Neil, CEO DNA payments Group Ltd

09 March 2026

Date.....

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Revision History:

Version	Date	Author	Approval	Details
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1.1	9 March 2026	Chloe Jowsey	Paula Keen / Kate Halls / Colin Neil	Reviewed and amended