Modern Slavery and Human Trafficking Statement
For the Financial Year ending 31 December 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in the United Kingdom ("Act").

Overview

Optal Limited ("Optal") is a company incorporated in England & Wales under company number 05531282 and is wholly owned by WEX Inc. (NYSE: WEX).

There is currently one wholly-owned subsidiary of Optal directly subject to the Act:

Optal Financial Limited (OFL and, together with Optal, being the "Optal Group") is incorporated in England and Wales under company number 08364883 with its registered office at 27-28 Eastcastle Street, London W1W 8DH. OFL is authorised and regulated as an Electronic Money Institution by the UK Financial Conduct Authority (FRN 900112) and provides virtual card payment solutions solely for business customers.

The Optal Group maintains a zero-tolerance approach to modern slavery, including forced labour, child labour, debt bondage, and human trafficking in its operations or supply chain. Our strategy is underpinned by our commitment to respect human rights, implement responsible business practices, and demonstrate continuous improvement.

Organisational Structure, Business, and Supply Chains

The majority of our suppliers are based in the UK, USA, EU, and Australia and primarily comprise other financial service suppliers and technical service providers. Our critical suppliers are predominantly other WEX group entities who are based in the above-listed countries. Optal Group employees are predominantly located in the United Kingdom and Australia.

In accordance with The Global Slavery Index 2023 issued by Walk Free[1], the above-listed countries are considered to have both a lower prevalence of modern slavery and active government responses to dealing with the issue.
Our supply chains are primarily composed of low-risk professional support services, technology and office facilities that enable us to effectively support both our customers and employees. The key components provided by our suppliers include:

- Real estate: Office spaces from which our teams operate.
- Technology: Cloud computing and storage, IT hardware and software, and print services that support day-to-day business functions.
- Business services: Office-related goods such as furniture, stationery, and marketing materials, as well as services including catering, security, and cleaning.
- Travel services: Arranging and managing our travel and accommodation needs. Professional services: External training providers, consultants, contractors, and legal advisory services.

Organisational Policies

The following policies are in place for identifying and preventing slavery and human trafficking in the Optal Group's operations:

- Modern Slavery Policy
- Risk Management Policy
- Outsourcing Policy
- Compliance Framework
- Speak Up Policy

[1] An international human rights group focussed on the eradication of modern slavery. The most recent comprehensive edition of the Global Slavery Index published by the human rights organization Walk Free is the 2023 report. For more information, see the website: https://www.walkfree.org/.

- Code of Business Conduct and Ethics (“Code”)
- Human Resources Handbooks

The Modern Slavery Policy outlines the responsibilities of all Optal Group employees to actively prevent, identify, and report any instances or suspicions of modern slavery within the business or its supply chain. To support this commitment, WEX provides a confidential 24/7 HelpLine service through which employees and third parties can raise concerns or suspicions related to modern slavery or human trafficking in any part of the business or associated supply chains. All reports are treated seriously, investigated appropriately, and handled in accordance with our ethical and compliance standards.

The Code outlines WEX’s expectations that all employees behave ethically and responsibly, in accordance with legal requirements. All third parties, including contingent workers and suppliers, need to act in accordance with the Code.

The Speak Up Policy sets out an expectation for our employees to speak up and report non-compliance with applicable laws, WEX’s policies and the Code. Employees who engage suppliers, consultants, temporary workers or other service providers must monitor their work to be sure they act in a manner consistent with the Code and WEX’s policies and report it when they do not. This includes reporting Modern Slavery practices in the Optal Group or its supply chain.

All corporate policies and associated procedures are reviewed regularly to ensure that both existing and new policies and procedures meet the Optal Group’s obligations under the Act and as set out in this statement. Our employees must certify that they understand and will comply with the Code upon joining WEX and annually thereafter.

Due Diligence Processes

WEX conducts risk-based due diligence and assessments on its key suppliers, and they are required to conduct their business in accordance with our expectations as outlined in the Code.

All external vendors that are providing services supporting WEX Inc. and its subsidiaries, including the Optal Group, are required to attest to their compliance with WEX's Modern Slavery Policy.

WEX also conducts risk-based due diligence and assessments of its business customers both prior to entering into a relationship with them and on an ongoing basis.

Both customers and suppliers undergo the screening, which includes checks for adverse media, regulatory issues, and reputational concerns, including any past involvement in modern slavery or related offences. This includes checking directors, beneficial owners, and controlling individuals for adverse media.

Ongoing Monitoring

The screening process outlined above is carried out on a continuous basis to ensure ongoing compliance and to proactively identify emerging risks across our customer base and wider third-party ecosystem.

Awareness

As part of the Optal Group’s responsibilities under the Act, WEX has raised awareness of modern slavery issues by educating and providing annual training that is focused specifically on modern slavery to all its staff, which explains:

- Our commitment to the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

This training ensures all employees abide by our policies and are able to effectively identify suspicions of modern slavery.

Assessment of the effectiveness of these actions

At the time of this statement's publication, no instances of Modern Slavery and/or Human Trafficking have been identified.

Enhancement of the Modern Slavery Framework

We recognise that our review and assessment of our actions to identify and address our modern slavery and human trafficking risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continuing to build upon. The Optal Group and WEX strive to make continuous improvements in our Modern Slavery Framework following regular reviews. .

Approval

This statement has been approved by the Board of Directors of Optal Limited and Optal Financial Limited and is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery and Human Trafficking Statement for the financial year ending on 31 December 2025 .

Signed: DocuSigned by: Kim Frances Ford A3D5BB8DEC07415...
Name: **Kim Ford**
Title: **Director of Optal Limited**
Date: 30 June 2026

Signed: Signed by: 124D4288482649E...
Name: **Darragh Deady**
Title: **Director of Optal Financial Limited**
Date: 30 June 2026