



Modern Slavery Act Statement for the Financial Year ending 31 December 2021

Business structure and supply chains

Optal Limited (**Optal**) is a company incorporated in England & Wales under company number 05531282. On 15 December 2020 Optal and its subsidiaries were acquired by WEX Inc.

There is currently one wholly-owned entity within the Optal Group directly subject to the Modern Slavery Act 2015 (the **Act**):

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

As a financial services provider, Optal and its subsidiaries have relatively simple supply chains compared with organisations in other industry sectors. The majority of our suppliers are based in the UK, Europe, the USA and Australia and primarily comprise other financial service suppliers and technical service providers, but our critical suppliers are other WEX Inc group entities.

Governance

Slavery and human trafficking are serious criminal activities, and Optal and its subsidiaries will not knowingly support or do business with any organisation involved in such activities.

Optal operates the following policies for identifying and preventing slavery and human trafficking in its operations:

- Enterprise Risk Management Policy
- Outsourcing Policy
- AML Policy
- Speak Up Policy
- Code of Business Conduct and Ethics
- HR Handbooks

Optal continually monitors and reviews its corporate policies and associated procedures to ensure that both its existing and new policies and procedures meet its obligations under the Act and as set out in this statement.

In Q4 2021, Modern Slavery Training was conducted for Optal employees, which includes a theoretical presentation, case study, and Modern Slavery Test.

Optal conducts risk-based due diligence and assessments of its key suppliers and business customers both prior to entering into a relationship with them and on an ongoing basis to identify those suppliers it considers to be most at risk of having slavery or human trafficking in their business or supply chains.



Furthermore, Optal monitors its business customers' transactions and adverse media to detect unusual supplier payments, which may indicate criminal activity, including people trafficking.

Optal's risk assessment on business customers includes multiple factors, including:

- country risk
- customer risk
- industry sector risk
- transaction risk
- business partnership risk

For key suppliers, Optal obtains and reviews their slavery and human trafficking statements where such statements are published on an ongoing basis.

Effectiveness

No known or suspected issues of slavery and human trafficking were identified in Optal's supply chain in the last financial year.

Looking Ahead

2022 Modern Slavery Training is going to be rolled out for Optal employees in Q3 2022.

Approval

This statement is made pursuant to section 54(1) of the Act for the financial year ending 31 December 2021 and has been approved by the Board of Directors of Optal. This statement will be reviewed and updated annually.

Date: **22 March 2022**

Signed: 
Name: **Kim Ford**
Title: **Director of Optal Limited**

Signed: 
Name: **Victoria Lloyd**
Title: **Director of Optal Financial Limited**