

WEX INTERNATIONAL - MODERN SLAVERY POLICY

Introduction

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

WEX has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chain.

WEX expects the same high standards from all of its contractors, suppliers and other business partners and WEX expects that its suppliers will hold their own suppliers to the same high standards.

Applicability

This framework applies to WEX Australia Newco 2020 Pty Ltd, Optal Limited, eNett International Singapore Pte Ltd and their subsidiaries, and their employees (collectively "WEX" or "WEX International") and applies to all lines of WEX International products. For the avoidance of doubt, this Framework also applies where the execution of certain controls has been outsourced to another Group entity (via an intra-group outsourcing or shared services arrangement) or any other third-party outsourced service provider.

Policy

As WEX International operates across various jurisdictions, its entities must comply with local Modern Slavery laws, regulations and guidelines which can be found in Appendix A.

1. Compliance with Policy

The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of employees of WEX. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chain of any supplier tier at the earliest possible stage. Contact WEX's confidential, third-party Integrity Helpline service 24/7 online at wexhelpline.ethicspoint.com or by toll-free call using your country-specific phone number listed in the left-hand drop-down menu on the site. See the [Helpline](#) page for more information.

WEX aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. WEX is committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of the business.

2. Roles and Responsibilities

2.1 Senior Management

WEX's Senior Management will establish a governance framework to monitor and manage the risks related to modern slavery. They will ensure that adequate controls, systems, and training are in place to support the implementation of this Policy.

2.2 Corporate Compliance

Corporate Compliance is responsible for ensuring the effective implementation and oversight of this Policy. They will review and approve the Policy annually, and provide necessary resources to fulfil its requirements. The team will also publish the Modern Slavery statement and submit a copy of the statement to the Regulators.

2.3 Employees

All employees have a responsibility to familiarise themselves with this Policy and report any concerns or suspicions regarding modern slavery to their immediate supervisors or through the reporting channels as described in WEX's Speak Up Policy.

2.4 Suppliers and Business Partners

WEX expects its suppliers and business partners to adhere to the principles set out in this Policy and demonstrate their own commitment to combating modern slavery. WEX will conduct due diligence on its suppliers and business partners to assess their compliance with this Policy.

- **Procurement of Goods and Services**

Procuring goods and services will, as far as reasonable, be conducted in a way as to ensure that WEX sources goods and services from entities that comply with their Modern Slavery obligations. The extent of the due diligence conducted in the procurement process will depend on the types of goods or services being sourced. Some examples of the due diligence that may be conducted include requesting:

- self-assessment/attestation that the supplier complies with various provisions in the Act;
- a copy of the supplier's most recent Modern Slavery statement (if applicable);
- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain. If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Modern Slavery practices.

3. Contract management and monitoring key suppliers/offshore partners

The adoption of anti-slavery wording in contracts to cover compliance with Modern Slavery. The obligations in the clause to include:

- Obligation to comply;
- A requirement to take reasonable steps to ensure that there is no modern slavery in the contractors supply chains or any subcontractor's supply chains; and
- A requirement to notify WEX if the supplier becomes aware of any actual or suspected breach of this Policy. WEX will work collaboratively with key suppliers/business partners to identify and manage modern slavery risks and develop commercial and actionable solutions.

4. Training and Awareness

Modern Slavery training will be provided to all staff through the Workday portal annually or upon new hire. WEX’s zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

WEX may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

Appendix A – Modern Slavery Legislations

Jurisdictions	Legislations
Australia	Australia Modern Slavery Act 2018 (Cth) and Guidance for Reporting Entities
European Economic Area (EEA)	Forced Labour Regulations 2022
Ireland	Criminal Law (Human Trafficking) (Amendment) Act 2013
Singapore	N/A
United Kingdom	UK Modern Slavery Act 2015