InComm Europe Limited

Modern slavery and human trafficking statement – FY25/26[1]

Introduction

This statement is made on behalf of InComm Europe Limited ("InComm").

Modern slavery is a violation of fundamental human rights. It can manifest in several forms, such as slavery, servitude, debt bondage, 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. InComm is committed to running our business responsibly and we support the international legislative effort to combat modern slavery and human trafficking, including the UK Modern Slavery Act 2015 (the "Act").

We conduct our affairs in an ethical way. Through our actions, we demonstrate our commitment to acting with integrity, fairness and accountability: principles that are fundamental to fostering an inclusive society and a successful business. We work closely with our suppliers and we expect the same ethical commitment from them.

Structure and Supply Chain

InComm was incorporated in 2004, has approximately 30 employees and is based in Whiteley, Hampshire, UK.

InComm is a company that transforms the shopping experience through innovative prepaid products and ground-breaking payments technologies, including digital platforms that allow brands and distributors to sell, promote and deliver prepaid products both digitally and physically, point-of-sale payment technologies, third party gift cards, product control technologies, bill payment solutions, wireless payment technologies, online payment processing strategies and prepaid cards for tolling and transit payment solutions.

Policies on Modern Slavery

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. InComm Payments maintains an internal Modern Slavery Policy which advances the commitment of the organisation to eradicate all forms of modern slavery. This statement is made pursuant to Section 54 of the Act and sets out the steps we have taken to prevent modern slavery and human trafficking in our business and supply chains.

We aim to foster a trusting, open and inclusive environment within our business and treat each person we deal with in a manner that reflects our values. We expect all our people to treat each other, and those we deal with, respectfully and with dignity. We do not tolerate physical violence, threats, verbal abuse, disrespectful behaviour, bullying or harassment of any kind.

[1] This statement covers the period starting 1 March 2025 and ending 28 February 2026.

Demonstrative of this, our employee Code of Conduct requires employees to be honest and ethical in all work and professional relationships, to treat everyone fairly and courteously, to have mutual respect in the workplace and not to engage in any unlawful or unethical activity. Violations of our Code of Conduct are investigated thoroughly and may result in disciplinary action, including immediate termination.

We encourage our people to raise ethical and legal concerns, including any concerns about human rights issues. We also stress that we have zero tolerance for retaliation against anyone who speaks up in good faith. We respect and comply with all laws, rules and regulations which apply to our business, as well as human rights and fair employment practices.

Supply chains, Supplier Selection

We assess and manage the risk of modern slavery and human trafficking occurring in our business and supply chains on an ongoing basis. We choose our suppliers with care through a number of evaluations, including based on their reputation and integrity. Our due diligence includes reviewing supplier terms and conditions, conducting risk assessments for new supplier relationships, and requiring suppliers to confirm compliance with applicable laws.

We recognize that certain sectors and geographies present higher risks of modern slavery. Given InComm's business as a payments technology provider with primarily UK-based operations and supply chains concentrated in the technology and professional services sectors, we consider our modern slavery risk profile to be relatively low. However, we remain vigilant and continue to enhance our risk assessment processes.

Training for Staff

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. We require mandatory regulatory compliance training of all new hires plus annual training for all employees. The curriculum consists of various training and refresher courses, including a course on Modern Slavery and Human Trafficking. This is in addition to modules that are relevant to modern slavery and human trafficking, such as ethics, anti-discrimination, anti-harassment and sensitivity, anti-money laundering and acknowledgment of the InComm Code of Conduct and Employee Handbook. On an ongoing basis we review our curriculum to ensure it is contemporary and relevant; we have taken modern slavery and human trafficking into account in such review and we intend to continue to do so.

Furthermore, we have taken advice from our English lawyers on the impact of and responsibility for compliance with the Act. Our legal team is aware of the provisions of the Act, including the recommended reporting areas under Section 54. We endeavour to comply with the recommendations and spirit of the Act.

Further Steps

We understand the importance of promoting good practice in relation to the prevention of modern slavery and human trafficking, both internally and when working with our partners.

We will continue to monitor and develop our practices in respect of combatting slavery and human trafficking.

Effectiveness and Key Performance Indicators

We use the following indicators to measure the effectiveness of our approach: completion rates for modern slavery training (targeting 100% compliance annually); number of supplier due diligence reviews conducted; any reported concerns or incidents relating to modern slavery (none reported during this period); and periodic review of our Modern Slavery Policy. We will continue to develop and refine these measures.

This statement has been approved by our Board of Directors and is reviewed annually.

Signature

Name Mr. Stefan Happ, Director
InComm Europe Limited

Date July 24, 2026