

**Modern Slavery Statement****FY 2024 Human Rights and Anti-Trafficking Statement****Introduction**

The following document outlines the actions that W.A.G Payment Solutions plc and its subsidiaries (the EUROWAG Group) have taken to prevent modern slavery and human trafficking in our operations and supply chain for the FY 2024. This statement is being made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015.

This statement covers all our wholly owned and controlled subsidiaries which are covered under the Modern Slavery Act. For more information about our subsidiaries, please refer to pages 178-181 in our [FY 2024 Annual Report](#).

The Board of Directors has approved this statement on 22.5.2025.

Signed

Martin Vohanka

Chief Executive Officer, W.A.G payments plc

## About us

### About the Eurowag Group, its operations and supply chain

The Eurowag Group is a leading pan-European integrated payment and mobility platform focused on the commercial road transport (“CRT”) industry. Our purpose is to help the CRT industry to become clean, fair and efficient.

Founded in 1995, the Group became a publicly listed company on the London Stock Exchange in October 2021. The company has origins in central and eastern Europe, an area that represents a significant proportion of the European CRT supply and an under-served and rapidly growing part of the European market. As of FY 2024, the company employed ~1900 employees and operates in 23 countries.

Our main focus is international and domestic, small and medium-sized enterprises (“SMEs”) fleets.

The Group’s business includes payment solutions and mobility solutions:

- Payment solutions represent the majority (57% net revenue in 2024) of our business and include a secure means of energy payments through pre- or post-paid fuel cards, and toll payments.
- Mobility solutions (43% net revenue) offer our customers tax refund, fleet management, transport management, smart routing, work time management and other adjacent services.

### Our Supply Chain

The Group’s business is dependent on strategic relationships with third parties mainly in Europe, which fall into the following categories:

- Fuel and alternative fuel suppliers – these entities also include partners in our acceptance network.
- Toll chargers and toll providers – these partners include third parties offering services where the Eurowag Group is not currently providing its own services.
- Authorisation centres – entities that support the Group’s payments business.
- Technology service providers - entities that support the Group’s overall business operations, including those providing key infrastructure and software services and support.
- Technology hardware – suppliers that provide hardware and components for the Group’s telematics units.
- Adjacent services – these partners support the wellbeing and safety of our truck drivers, including parking, washing, repairs, freight ferry booking and roadside assistance.

## Our Governance Structure and Policies

We are committed to upholding the principles embodied in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights

We respect human rights in our value chain and have created a work environment where we treat everyone with dignity and respect, and ensure it is free from harassment, bullying, and discriminatory or intimidating behaviour of any kind. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply or customer chains. We state these commitments in our Code of Conduct, Group Procurement Policy, Code of Conduct for Suppliers, Group Modern Slavery and Human Trafficking Policy and Equal Opportunities, Anti-Bullying and Anti-Harassment Policy. In addition, our contracting processes with third parties include specific prohibition of the use of forced, compulsory, or trafficked labour, or of anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their suppliers to the same high standards.

### Our governance structure

The Board of Directors has overall accountability for ensuring that the company complies with its legal and ethical commitments to uphold and respect human rights and prevent incidents of modern slavery and human trafficking from occurring.

The Executive Committee has delegated responsibility from the Board for directing and overseeing the sustainability strategy, and ensuring that the related policies, including human rights and modern slavery, comply with our legal and ethical obligations.

The Sustainability function has primary and day-to-day responsibility for overseeing the implementation of the company's Modern Slavery and Human Trafficking Policy, as well as monitoring its use and effectiveness, and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery and respecting human rights.

Management is responsible for ensuring all employees understand and comply with this policy and is given adequate and regular training on it. From 2022, the company started to deploy specific training on human rights and modern slavery.

### Our policies

We maintain a comprehensive compliance framework aligned with globally recognised standards such as UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises and International Bill of Human Rights and with international sanctions regimes.

We have adopted a number of key policies that help address issues relating to human rights and modern slavery, including:

- Anti-harassment, Anti-Bullying
- Modern Slavery and Human Trafficking
- [Personal Data Protection](#)
- Gifts and Anti-bribery

- Anti-money laundering
- Relationship Management Guidelines for Third Parties
- [Speak Up and Whistleblowing policy](#)
- Grievance policy
- Conflicts of Interest
- Our [Code of Ethics](#) outlines our standards and guides to the way we do business across our operations.
- [Code of Conduct for Suppliers](#)

We regularly update our policies to reflect legislative changes and evolving internal context. In 2024 we focused on updating our Anti-bribery & Anti-corruption, and Conflict of Interests, policies as well as launching new and redesigned trainings, as described below.

### **Anti-bribery and Anti-corruption**

Eurowag has zero tolerance to all forms of bribery and corruption: the offer, payment, authorisation, solicitation and acceptance of bribes and other improper advantages is unacceptable. In 2024 we redesigned our Anti-bribery and Anti-corruption policy, intended to

- Outline Eurowag's risks related to Bribery and Corruption,
- Outline and explain the prohibitions against Bribery and Corruption in all of Eurowag's operations,
- Define Eurowag roles and responsibilities under both the relevant Anti-corruption laws and Eurowag internal regulations,
- Provide with the tools and support necessary to identify and address those Bribery and Corruption risks,
- Ensure that Eurowag complies with all applicable laws, standards, and expectations of key stakeholders in relation to Anti-bribery and Anti-corruption matters.

We also developed an operational guideline, set minimum standards, defined 1<sup>st</sup> & 2<sup>nd</sup> line measures and controls in this area, and developed both general online and deep dive trainings.

### **Conflict of Interests**

In 2024 we reviewed and updated our Conflict of Interests policy. Eurowag Group and all of its members are subject to extensive regulations in the course of daily business. The Policy contains the rules and principles relating to the management of Conflict of Interests in Eurowag and applies to every Eurowag subsidiaries in which the mother company holds (directly or indirectly) more than 50 % shares. Compliance with this Policy is mandatory for all Eurowag Employees.

The policy is designed to:

- Set out the terminology of the Conflict of Interest area and provides examples,
- Design key elements of the Conflict of Interest management system,
- Set out the responsibilities of Employees, specific positions and organisational units,
- Provide information and guidance to those working for and on behalf of Eurowag how to recognise and deal with Conflicts of Interest,
- Set out the mechanisms of prevention and mitigation of the risks arising from Conflict of interest issues.

We also developed an operational guideline, set minimum standards, defined 1<sup>st</sup> & 2<sup>nd</sup> line measures and controls in this area, and developed both general online and deep dive trainings.

## Speaking Up and Whistleblowing

In 2024, we further fine-tuned our Speak Up (Whistleblowing) procedure and promoted our reporting channel, the Eurowag Integrity Line, which fully complies with all applicable legislation and empowers individuals to address their concerns about possible violations of Eurowag's ethical principles and values. During 2024, we received four issues raised through the integrity line, related to internal employment conditions, compared to three in the previous year. All issues were investigated and addressed by the compliance team, and no violations of human rights were found.

We have also cascaded our whistleblowing process down into our supply chains, so it can also be used by our suppliers and/or customers to raise concerns about any human rights concerns or issues. No concerns were raised through it in 2024 from our suppliers or value chain.

The EUROWAG Group remains 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 its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

## Implications for Non-Compliance

Any Staff Member who breaches the company's policies, including the Modern Slavery and Anti-Trafficking Policy, is subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.

In business partnership and supply chain, the EUROWAG Group identifies its human rights impacts and salient issues, and tries to remediate them with its partners. In case remedy is not possible, Eurowag may terminate the relationship with other individuals and organisations working on our behalf, if they breach this policy.

## Risk Assessment and Management

In 2024, Eurowag's sustainability and procurement team members participated in the UN Global Compact Business and Human Rights Accelerator<sup>1</sup>. It was a six-month training programme to inspire action in and guide companies in their human rights due diligence process – covering value chain impacts, human rights impacts, action planning, stakeholder engagement, remedy and grievance mechanisms. The programme participation helped us better identify and assess our salient human rights impacts and develop an actionable plan. We integrated these insights into our impacts, risks and opportunities (IROs) assessment.

During 2024, Eurowag conducted a Double Materiality Assessment in accordance with the requirements of the CSRD/ ESRs. This assessment involved identifying and objectively evaluating ESG-related impacts, risks and opportunities ("IROs"), including human rights-related impacts. As a result of this process (see full description on page 11 in our 2024 [Sustainability Report](#)), we prioritised and determined a narrow list of material IROs based on the result of the assessments. We also identified which specific metrics and information about the prioritised human rights-related IROs will need to be monitored and collected during the coming years.

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<sup>1</sup> <https://academy.unglobalcompact.org/account/login/?>

In 2024 we developed a risk assessment tool to map potential risks at our suppliers. It utilises robust international indices that measure geographical risks for modern slavery and human rights incidents, including UN Human Development Index, Freedom House's Freedom in the World Index (Civil Liberties), UNICEF Child Rights Atlas, ITUC Global Rights Index, the US State Department Trafficking in Persons Report, the Global Slavery Vulnerability Index, and the World Bank Worldwide Governance Indicators – Regulatory Quality. The tool employs geographical risk alongside sectoral risk, developed by an expert third-party consultancy. Annual engagement with suppliers can then be prioritised according to the results of the risk assessment.

In addition to human rights and modern slavery-specific risk assessments, human rights and modern slavery is identified as part of the Group-wide risk register. This is reviewed and monitored by the Audit & Risk Committee.

## Our Due Diligence and Onboarding Processes

As part of both the customer and supplier onboarding processes, third parties are subject to due diligence screening which includes sanctions checks, sensitive countries and other financial crime blacklists, which can also be indicators of risk related to human trafficking and modern slavery red flags.

In 2024, we continued to improve our internal system and processes to upgrade our supply chain due diligence and engagement with our supply chain to promote sustainable and responsible business practices. We developed a new tool for supplier onboarding and screening of vendors for sustainability-related risks. We began the work of implementing the screening tool into Eurowag's procurement process, whereby the assessment includes potential risks linked to human rights, forced labour or modern slavery. In case a supplier is flagged as risky, we will engage with them to get further detail and better assess the level of risk. We also created ESG-related criteria for use in tender evaluations, including human rights and supply chain due diligence considerations.

## Training on modern slavery and human trafficking:

In 2022, the Group started to roll out human rights and modern slavery training for leadership and employees involved in key functions, notably Procurement (including fuel procurement), Operations management, Customer onboarding and Sales.

In 2024 we broadened the scope to our newly acquired entities and 1798 employees (84% of all employees) took part in the training across the organisation, including our subsidiaries, and all new joiners.

## Key Performance Metrics, Tracking Progress, and Remediation

Eurowag tracks incidents of non-compliance with our policies as well as legal and regulatory requirements through the legal, compliance and risk functions as well as our whistleblowing channels.

The scope of topics tracked cover any incidents relating to any event with an adverse impact, being either a financial loss, reputational damage, or regulatory attention, due to inadequate or failed internal processes or systems, mistakes by or (mis) conduct of people, or external events – including human rights and modern slavery.

In addition to the Whistleblowing line, employees are asked to report incidents through our internal reporting system where they can choose the type of and category of incident with details. Legal, compliance and risk teams then review the reported incident and investigate these cases.

The Group publicly reports on whistleblowing cases as well as participation in compliance training. This can be found in the sustainability section of the FY 2024 annual report. In 2024, 4 cases were reported through these channels. None of these were linked to human rights.

## Summary of our future plans

In terms of next steps and priorities for 2025:

- In 2025 we will integrate the results of the double materiality process into our strategy, policies and action plans, including material human rights-related impacts on our employees and value chains. Our goal is to develop policies, metrics, and targets wherever needed to build robust internal governance around these prioritised human rights-related IROs. At the same time, we will carefully monitor any legislative changes that may come through the process of simplifications of the Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD) that will impact this agenda.
- We will continue to work cross-functionally to strengthen our sustainable procurement approach by better assessing potential risks within our supply chain, and by continuing to work on implementing the sustainable procurement tools that were developed in 2024.
- We will embark on the next phase of our supply chain project to identify and work with a small group of key suppliers to improve their sustainability practices.
- We will review and update key policies and procedures, focusing on personal data protection (GDPR), fraud risk management, and fair competition. This will include revising and enhancing training programmes in these areas and conducting Group-wide awareness campaigns to promote ethical behaviour among employees, managers, and contractors. Additionally, compliance training in all areas will be reviewed and improved to elevate the overall compliance training programme.