



Anti-Slavery and Human Trafficking Statement 2018

Opening statement from senior management

allpay Limited is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. allpay Limited works very closely and maintains relationships with many suppliers and organisations. Being one of the largest employers in Herefordshire, people are the heart of allpay and we are dedicated to have policies and procedures in place that will manage and eliminate any risk of slavery and human trafficking.

allpay Limited has adopted a statement which underpins our corporate approach to Anti-Slavery and Human Trafficking which can be seen below.

allpay Limited expects every organisation in its supply chain to address issue of slavery and human trafficking in accordance with the Modern Slavery Act 2015.

Structure of the organisation

allpay Limited is the UK's leading payments specialist, providing bill payments services primarily to the public sector.

allpay Limited has a global annual turnover of £70 million. To find out more about the nature of our business, please visit www.allpay.net

In order to be able to provide the services and allow each of our clients to save money through modern payment systems, we work with a range of suppliers from whom we expect integrity and ethical approach in complying with the Modern Slavery Act 2015.

Policies

As part of our commitment to combating modern slavery, we have implemented the following policies:

Anti- Slavery and Human Trafficking Policy which aims at combating modern slavery. A copy of the Policy can be requested from allpay's HR Department.

We also make sure our suppliers are aware of our policies, and adhere to the same high standards.



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Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures to include internal and external audits of the suppliers and ensuring that all suppliers within our supply chain are monitored in line with the Ethical Procurement Policy.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

Risk and compliance

allpay Limited regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by conducting supplier checks at the outset of any engagement.

Where we have identified a potential risk through the prospective supplier questionnaire process we investigate these further to ensure that these could be mitigated and remedied. If for some reason this is not possible, allpay Limited would not engage with the supplier in question.

We ensure all our suppliers adhere to our Anti- Slavery and Human Trafficking Policy by conducting Modern Slavery Act- Supplier Questionnaire that is required to be completed by all suppliers. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies we will immediately seek to terminate our relationship with the relevant supplier.

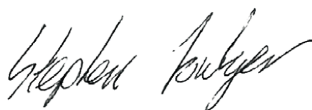
Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of the organisations anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking: adopt a zero tolerance approach to modern slavery and human trafficking and ensuring that this is communicated to all suppliers, contractors and business partners of allpay Limited at the commencement of the relationship and every year thereafter.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes allpay's slavery and human trafficking statement for the financial year commencing July 1st 2018 and ending June 30th 2019.



HR Director
allpay Limited

1st June 2018.

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