

CARDTRONICS PLC - SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “MSA”).

Cardtronics plc (“Cardtronics” and together with its applicable subsidiaries, the “Group”) is committed to improving practices to combat slavery and human trafficking. The Group will not tolerate any such practices in our supply chain and we are taking steps to minimise the risk of Cardtronics working with any organisation that engages in such practices.

ORGANISATION'S STRUCTURE

We are a provider and operator of Automated Teller Machines in the private sector. Cardtronics is the ultimate parent company of the Group with our head offices based in England and Wales. The Group has over 2,200 employees worldwide and operates across Europe, USA, Canada, Mexico, Puerto Rico, South Africa, Australia and New Zealand.

The Group has a global annual turnover of \$1.45 billion.

OUR BUSINESS

We have a diverse network of customers and suppliers across the globe and recognise that, while it is ultimately our suppliers’ responsibility to treat their own staff and suppliers in an ethical fashion, Cardtronics as a customer can play an active role in ensuring that the organisations we work with operate within the law and do not infringe the rights of others. As such, Cardtronics is committed to further developing and implementing a global MSA compliance program across all jurisdictions.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to minimising the risk of modern slavery or human trafficking in our supply chain or in any part of our business. Cardtronics already has a Code of Business Conduct and Ethics (the “Code”) that places compliance with the legislation of any jurisdiction we work in at the heart of our business and all of our employees receive training in and agree to abide by the contents of the Code. We have now also formulated a specific Anti-slavery Policy which has been formally adopted by the board of directors. Each employee in the Group will receive training on the new policy and will be asked to commit to comply with it and immediately raise any concerns with their immediate managers or through the confidential whistle-blowing procedure. These policies, taken together, reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain or our business.

A link to our policies can be found here: <http://ir.cardtronics.com/corporate-governance.cfm>

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The UK parts of the Group utilise standard terms and conditions, appended to our purchase orders in the UK, which require suppliers to comply with all applicable legislation and allow the applicable UK-based Group counterparty to immediately terminate the agreement if it transpires that the supplier is in breach of inter alia the MSA. Efforts are underway to include such provisions in new agreements with suppliers in other jurisdictions.

As part of our UK supplier approval process, we have introduced an enhanced vendor vetting checklist in the UK parts of the business, asking potential suppliers to confirm specifically that they comply with the requirements of the MSA. If any responses to the checklist questions raise any concerns, these are escalated to senior management and the legal team for review before the supplier is permitted to work with the Group. This process will be gradually introduced into other jurisdictions over time. Enhanced contractual protections for Cardtronics, emphasizing the requirement for customers and suppliers alike to abide by applicable laws, have been introduced as standard contractual conditions in all of the Group's EU jurisdictions. These contractual provisions are being reinforced with self-reporting obligations for regulated and/or licensed businesses and enhanced due diligence checks where the Group is on-boarding new customers and suppliers.


As a means of vetting existing suppliers, Cardtronics has in the UK identified a large number of different entities supplying all parts of the UK business of the Group and has issued retrospective vetting questionnaires relating to compliance with the MSA. The Group is in the process of evaluating and reviewing the responses received so far. Similar activities and retrospective vetting exercises are planned for other jurisdictions in the near future, with a particular focus on perceived "at risk" jurisdictions.

Cardtronics has long operated a safe and confidential whistle-blowing policy and process and actively encourages employees to use it if they become aware of any breach of any law or any Group policy. Cardtronics also has a robust internal audit process and works extensively with auditors both inside and outside the organisation to ensure that its businesses are operated in accordance with applicable laws and the Group's own policies and procedures.

Since the adoption of its statement of compliance last year, Cardtronics has initiated the process to adopt a global supplier code of conduct ("**Code of Conduct**"). The Code of Conduct outlines Cardtronics' desire to engage with suppliers that have a shared commitment to our ethical, legal and business standards and values. The Code of Conduct has been reviewed and commented on by each business jurisdiction within the Group and is intended to be put to the Board of Directors for final review and approval in 2018. Following its adoption, it is intended that the Code of Conduct will be posted to the Cardtronics website and included in the vendor on-boarding materials used by global procurement. This will be coupled with training for the procurement and legal teams in each jurisdiction to fully understand the Code of Conduct.

Cardtronics released an internal employee communication to ensure that all staff are familiar with the terms of the updated Code and agree to abide by it. Cardtronics intends to provide further training to staff to be developed and implemented following its global compliance review in 2018. This training will include emphasis on recognizing and reporting suspected instances of compliance failures both inside the Company and within Company supply chains.

SIGNATURE:

A handwritten signature in blue ink, appearing to read 'Ed West', with a long horizontal flourish extending to the right.

Name: Ed West

Date: 16/05/2018