

## **STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015**

### **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 its supply chain and takes steps to minimise the risk of Cardtronics working with any organisation that engages in such practices.

### **ORGANISATION'S STRUCTURE**

The Group is a provider and operator of automated teller machines (ATMs). Cardtronics is the ultimate parent company of the Group with its head offices based in England and Wales. The Group has over 2,000 employees worldwide and operates across Europe, UK, USA, Canada, Mexico, Puerto Rico, South Africa, Australia and New Zealand.

The Group has a global annual turnover of \$1.35 billion (USD).

### **CARDTRONICS' BUSINESS**

The Group has a diverse network of customers and suppliers across the globe and recognises that, while it is ultimately the Group's suppliers' responsibility to treat their own staff and suppliers in an ethical fashion, Cardtronics has a social responsibility and can play an active role in ensuring that the organisations it works with operate within the law and do not infringe the rights of others. As such, Cardtronics is committed to further developing its global MSA compliance program across all jurisdictions where it conducts business.

### **CARDTRONICS' POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Cardtronics is committed to minimising the risk of modern slavery and/or human trafficking in its supply chain or in any part of its business. Cardtronics already has a Code of Business Conduct and Ethics (the “**Code**”) that places compliance with the legislation of any jurisdiction where Cardtronics operates at the heart of its business and all of its employees receive training in and agree to abide by the contents of the Code. Cardtronics also has a specific policy related to anti-slavery and anti-human trafficking (“**MSA Policy**”) which has been formally adopted by Cardtronics' board of directors. In 2020, each employee in the Group has been provided training on the MSA Policy and is expected to commit to its compliance and immediately raise any concerns with their direct managers or through Cardtronics' confidential whistle-blowing procedure. The Code and the MSA Policy, taken together, reflect Cardtronics' commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chain or business.

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

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

The Group's subsidiaries in the UK, Germany, and Spain utilise standard terms and conditions, appended to their purchase orders, which require suppliers to comply with all applicable MSA legislation and allow the applicable Group counterparty to immediately terminate the agreement if it transpires that the supplier is in breach of *inter alia* the MSA. All new bespoke supplier agreements are required, at a minimum, to include assurance from suppliers that in performing their services they will comply with all applicable laws and contain audit rights for the Group to validate compliance on an ongoing basis. These contractual provisions are being reinforced with self-reporting

