

# **Fiserv Modern Slavery Statement for Financial Year 2025**



## Overview

Canada, Australia and the United Kingdom each have enacted legislation that requires certain commercial organisations carrying on business or producing, selling, distributing, or importing goods (or controls an entity that does) within those respective countries and attaining certain minimum revenue amounts to publish an annual statement describing the steps they have taken during the preceding financial year to ensure that “Modern Slavery” is not taking place in their businesses or in any of their supply chains. This statement is intended to address those requirements on behalf of Fiserv, Inc. and its subsidiaries (together “**Fiserv**”) that are covered by these legislative acts.

“**Modern Slavery**” in this statement is defined to include the definition provided under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023) (“**Canadian Act**”); United Kingdom (“**UK**”) Modern Slavery Act 2015 (“the **UK Act**”) and Modern Slavery Act 2018 (Cth), Australia (“the **Australian Act**”), including slavery and human trafficking.

Fiserv recognises that Modern Slavery is a significant global issue that is inextricably linked to corporate sustainability. Fiserv has a zero-tolerance approach towards Modern Slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or in our supply chain.

## Our Organisation and Industry

Fiserv, Inc. is a leading global provider of payments and financial services technology solutions. We are publicly traded on the National Association of Securities Dealers Automated Quotations (NASDAQ) and a member of the S&P 500 Index. Our filings with the United States Securities and Exchange Commission can be found at [www.sec.gov](http://www.sec.gov).

We serve clients around the globe, including banks, credit unions, other financial institutions, corporate clients and merchants. We help clients achieve best-in-class results through a commitment to innovation and excellence in areas including account processing and digital banking solutions; card issuer processing and network services; payments; e-commerce; merchant acquiring and processing; and the Clover® cloud-based point-of-sale solution and business management platform.

Our operations are principally located in the United States. Additionally, we operate in over 30 other countries directly or through subsidiaries. Certain Fiserv subsidiaries, identified below, operate in the UK, Canada or Australia, and may, from year to year, depending on annual revenue, be within scope of either the Australian Act, the Canadian Act or the UK Act.



## Our Vendors

Fiserv operates globally offering a broad range of products and services, as such Fiserv has relationships with vendors around the world delivering a wide variety of products and services. Fiserv supply chains primarily are focused on:

Supplier Type	Examples
Hardware	Point of Sale, Computer Systems
Software	Licensed Software, SaaS
Professional Services	IT Outsourcing, Facilities Services, Development

Our Third-Party Risk Management Program sets forth the guiding principles, standards and associated governance structures to identify, assess, monitor, and mitigate risks associated with our vendors.

All vendors are required to go through a risk assessment process prior to engagement and periodically thereafter. The assessment seeks to identify operational risks, which risks are registered and resolved or managed and monitored.

## Risk Assessment

Fiserv is committed to never be complicit in human rights abuses, as part of that commitment Fiserv maintains robust risk assessment practices to identify modern slavery concerns.

Fiserv has a risk-based approach in assessing relevant risks to our business areas, product families and business processes. Currently Fiserv assesses our overall risk profile in relation to our operations and supply chains by referencing several factors including:

- High risk industries
- High risk countries
- High risk business models such as outsourcing work to third parties or contingent workers

Based on the above risk factors Fiserv has identified the following areas of heightened potential exposure to modern slavery risks:

- Fiserv's purchase of point of sale hardware from suppliers, it is understood hardware suppliers are recognized as being a higher risk for modern slavery due to the locations where manufacturing is undertaken.

- Fiserv engagement of outsourcing companies, for example in the use of facilities services. Fiserv understands these industries and, in particular, the roles being undertaken by contracted staff are at a higher risk of exploitation.

These areas may present higher Modern Slavery risks to our operations and supply chain. To the extent Modern Slavery risk factors exist, or if there is a reasonably foreseeable risk of Modern Slavery practices, it would be considered in our risk assessment activities.

Fiserv monitors Modern Slavery risk exposure, inter alia, through the number of identified concerns of modern slavery pursuant to risk assessment activities.

## Supply Chain Due-Diligence

Suppliers and vendors (collectively “third parties”) play an important role in the day-to-day operations of our business. These third parties provide Fiserv with a wide variety of products and services and often have large and diverse supply chains. In recognition of the importance and impact third parties can have on our business, we are committed to engaging with them in a responsible manner.

### Sourcing and Third-Party Risk Management

At Fiserv, the global strategic sourcing function helps facilitate third-party engagement and our third-party risk management function reviews suppliers for compliance with internal and external standards and expectations. These functions monitor and review third parties for compliance with our policies and principles and conduct risk assessments of their policies and business practices as appropriate in lieu of formal supplier code of conduct.

We maintain a third-party risk management program – overseen by the Third-Party Risk Governance Committee – that sets forth guiding principles, standards and associated governance structures to identify, assess, monitor and mitigate risks associated with vendor and supplier engagements.

### Policy and Approach

As reflected in our Code, we are committed to supporting the 10 principles of the United Nations Global Compact. This means that we have a duty to stand against human trafficking and modern slavery. To that end, our Third-Party Risk Management policy establishes the guiding principles and standards related to our processes for effectively identifying, assessing, mitigating and monitoring risks associated with the use of third parties.

As part of our third-party risk management program, all vendors and suppliers go through a risk-assessment process prior to onboarding. Thereafter, we conduct ongoing monitoring and periodic assessments of our vendors based on the level of risk presented to us and our clients. Assessments are tailored to the type of services provided, geographic location and overall level of risk the vendor presents to our organization and our clients, and are designed to identify operational, technology, financial, legal, privacy, corruption and compliance risks. Topics reviewed as part of third-party risk include:

- Anti-corruption and foreign corrupt practices policies
- Business resiliency
- Confidentiality and data protection

- Conflict minerals usage
- Financial stability
- Human trafficking and modern slavery
- Legal and compliance
- Privacy
- Quality of services delivered
- Reputation
- Technology

### **Human Rights Due Diligence**

Where appropriate, we seek to require vendors to contractually agree to comply with all laws relating to modern slavery, to affirmatively agree not to engage in modern slavery and to conduct due diligence of their own supply chain to ensure that their suppliers are not engaging in behavior that would support modern slavery. Any identified and validated issues may result in the selection of a different vendor, termination of the relationship, or steps to work with the third party to address the identified issues.

Our processes and procedures seek to comply with modern slavery reporting and review requirements for the UK, Canada and Australia and conflict mineral reviews in compliance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD.

### **Actions and Measures**

#### **Conflict Minerals Review**

In line with Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, we conduct an annual conflict minerals review. To conduct a reasonable country of origin inquiry, we:

- Identify product categories and parts in those categories that may contain conflict minerals
- Identify our direct suppliers who manufacture or supply those products or parts
- Review supplier information with our internal sourcing team
- Contact each supplier and request information regarding the conflict minerals that may be contained within the products provided by them and the source of the conflict minerals, including smelter and refinery information

We do not have a direct relationship with downstream smelters or refiners or sub-tier suppliers within the supply chain of its direct suppliers. Accordingly, we rely on our direct supplier to provide information regarding the origin of the conflict minerals contained in products or parts purchased from them by conducting a supply chain survey using the Conflict Minerals Reporting Template developed by the Responsible Business Alliance and the Global e-Sustainability Initiative and now maintained by the Responsible Minerals Initiative.

More information can be found in our conflict mineral report published on our website.

## Code of Conduct

Fiserv is committed to conducting its business in an ethical manner. Our Code of Conduct & Business Ethics (“**Code**”) serves as the foundation for ethical behavior across Fiserv and governs our associates, representatives, and affiliates of Fiserv. A copy of the Code can be accessed at: [Fiserv Governance Documents](#).

Fiserv requires that all associates complete annual training on the Code and certify that they have read the Code and understand their responsibilities. Compliance with this requirement is tracked by Fiserv.

The Code provides that we follow its letter and spirit, including the 10 principles of the United Nations Global Compact. It sets forth our associates’ duty to meet responsibilities in the areas of human rights, labour, environment, and anti-corruption.

Specifically, the Code provides that associates must:

### Human Rights

- Support and respect the protection of internationally proclaimed human rights
- Never be complicit in human rights abuses, including slavery, torture, or human trafficking

### Labour

- Respect diversity
- Stand up against forced and compulsory labour
- Stand up against child labour
- Eliminate workplace discrimination

### Environment

- Work to prevent environmental damage
- Promote greater environmental responsibility
- Encourage environmentally friendly technologies

### Anti-Corruption

- Work against corruption in all its forms, including extortion and bribery, and follow the Code and Fiserv policies and procedures at all times

In addition, associates are expected to:

- Respect all associates
- Refuse to work with human rights abusers
- Report corruption or human rights or labour abuse by a colleague or supplier



- Remember that human rights are, and must always be, a priority
- Design, deliver, and support our products and services in a manner that continuously complies with applicable laws and regulations

In addition to reading and acknowledging the Code, upon hire, and annually during the employment relationship, every Fiserv associate undergoes a criminal background check consistent with local law. The leadership of each of the Fiserv entities named below has also been given a specific briefing on the appropriate act, as captured in the “Overview” section of this document, as well as this statement.

## **Additional Policies and Procedures**

Fiserv maintains and enforces additional policies that further strengthen its commitment to the prevention of Modern Slavery, including the following:

### **Global Anti-Harassment Policy**

Fiserv is committed to providing a work environment in which all associates are treated with respect and dignity and are free from harassment, discrimination, and retaliation. Fiserv strictly prohibits all forms of workplace harassment by any person in the workplace and includes workers, applicants, the management team, and members of the public.

### **Global Anti-Bribery and Anti-Corruption Policy**

Fiserv is committed to promoting high standards of ethical business conduct and compliance with all applicable laws, rules, and regulations. As part of this commitment, Fiserv complies with the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act of 2010, and other applicable anti-bribery laws, and local laws. Fiserv has zero tolerance for bribery and corruption.

### **Anti-Money Laundering and Counter Terrorist Financing Policy**

Fiserv is committed to compliance with applicable laws and regulations relating to combating money laundering and terrorist financing activities and has adopted a Global Anti-Money Laundering and Counter-Terrorist Financing Policy and program.

### **Compliance With Employment Regulations**

Fiserv complies with all local employment laws and regulations including requirements governing working hours and rest days, meals and breaks, living/minimum wages, overtime, wage payments, and payments upon separation of employment.

### **Commitment to Associate Health and Welfare**

Our approach to wellness focuses on much more than physical health. The benefits and programs provided by Fiserv support associates’ total well-being, which includes physical, financial, emotional and social well-being.

## Reporting

Associates are responsible for supporting our Code, policies, procedures, and compliance with law, by reporting alleged violations immediately. Fiserv associates can report alleged violations through the Fiserv Alertline (available 24 hours a day, 7 days a week), by sending an email to the Ethics Office, or by talking to a manager or Human Resources representative. All potential violations are investigated and tracked to resolution. Failure to report a potential or suspected violation through one of the approved channels is a violation of the Code itself.

## Monitoring Controls

The relevant Fiserv Canada, Fiserv UK and Fiserv Australia entities jointly conduct a periodic review of the Modern Slavery risk to their entities and assess the effectiveness of the controls designed to manage this risk. The assessment includes a review of:

- Changes in the business that may impact on the Modern Slavery risk profile
- Modern Slavery training materials and associate awareness program
- Supplier Modern Slavery related to risk assessment process
- Modern Slavery related policy and procedures

## Assessing Effectiveness

Fiserv measures the effectiveness of its controls through tracking metrics related to the number and percentage of:

- Supplier modern slavery risk assessments – completed – new suppliers
- Suppliers screened as part of ongoing modern slavery risk due diligence
- Suppliers by spend amount, screened
- Supplier modern slavery risk improvement plans initiated
- Supplier modern slavery risk improvement plans completed
- Associates that have completed the Code of Conduct training
- Related issues raised through Fiserv's Alertline platform



## Consultation Process and Approval

This statement was prepared by teams representing the entities covered by this statement. It was approved by the boards of the relevant entities conducting covered business in the UK, Canada and Australia as detailed below and is signed by a director of each entity effective May 31, 2026, for the fiscal year ending December 31, 2025.

### UK Entities

FDR Limited, LLC	Signed by Melissa Pieri, Director
FDR U.K. Limited	Signed by Ali Baninajar, Director
First Data Europe Limited	Signed by David Klein, Director

### Australian Entities

First Data Corporation Australia (Holdings) Pty Ltd	Signed by Andrew Fox, Director
First Data Network Australia Limited	Signed by Andrew Fox, Director
First Data Resources Australia Ltd	Signed by Andrew Fox, Director
First Data Merchant Solutions Australia Pty Ltd	Signed by Andrew Fox, Director

### Canadian Entities

Fiserv Canada, Ltd.	Signed by Brian Green, Director
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## About Fiserv

As a global leader in payments and financial technology, Fiserv helps clients achieve best-in-class results through a commitment to innovation and excellence in areas including account processing and digital banking solutions; card issuer processing and network services; payments; e-commerce; merchant acquiring and processing; and Clover®, the world's smartest point-of-sale system and business management platform. Fiserv is a member of the S&P 500® Index and one of TIME Magazine's Most Influential Companies™. Visit [fiserv.com](https://www.fiserv.com) to learn more.

