



SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

The UK Modern Slavery Act (the “MSA”) came into force in October 2015, and introduced a requirement for large commercial organizations operating in the United Kingdom to publish a statement setting out the steps they have taken during the preceding financial year to ensure that slavery and human trafficking are not taking place in their businesses or in any of their supply chains.

ABOUT FIRST DATA

First Data Corporation is the global technology leader in payment technology and service solutions, headquartered in Atlanta, Georgia, United States.

The company’s 24,000 owner-associates across 34 countries are dedicated to helping businesses of every size, from small startups to the world’s largest corporations, conduct commerce every day by securing and processing more than 2800 transactions per second and \$2.2 trillion per year.

First Data Corporation operates in the UK through subsidiary companies, whether they are incorporated and/or registered in the UK, sitting within the supply chains of other First Data group companies or otherwise.

This statement is made by First Data Corporation and is intended to also be used, and to relate to the steps taken in the preceding financial year, by each member of the First Data group that is required to produce a slavery and human trafficking statement in accordance with section 54 of the MSA.

Across First Data, we have supply chains made up of over 6,500 organisations based in more than 30 different countries, varying from small to medium sized enterprises to other large multinationals. Many of those direct suppliers will have substantial and diverse supply chains of their own.

POLICY STATEMENT

At First Data, we have a zero-tolerance approach to slavery. We are committed to act ethically and with integrity in our business dealings and relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business or in any of our supply chains.

We are also committed to ensure there is transparency in our business and in our approach to tackling-slavery and human trafficking. We expect the same high standards from all of our contractors, suppliers and other business partners.

First Data’s Code of Conduct codifies our commitment to corporate and workplace practices and principles consistent with the requirements of the Universal Declaration of Human Rights and the International Labor Conventions. This commitment includes compliance with requirements related to working conditions and provision of a safe working environment, wage and hour laws, child labor laws, non-discrimination in the workplace, rights of employees to associate and bargain collectively, prohibition of forced and compulsory labor, maintenance of reasonable working hours and fair remuneration and investment in staff training and development. First Data’s approach to respecting human rights consists of several core elements, including adherence to corporate policies; compliance with applicable laws and regulations; regular dialogue and engagement with our stakeholders; and contributing, directly or indirectly, to the general wellbeing of the communities within which we work.

First Data's Vendor Risk Management Program sets forth the guiding principles, standards, and associated governance structures for effectively identifying, assessing, monitoring and mitigating risks associated with the use of third party service providers.

In line with regulatory guidance and industry best practices, the Vendor Risk Management Program is structured around a five-phase life cycle covering: planning, due diligence, contract negotiation, ongoing monitoring, and termination.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

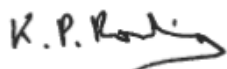
As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistleblowers

TRAINING

To maintain awareness and ensure a high level of understanding of the risks of slavery and human trafficking in our business, our Code of Conduct is available in our Employee Handbook and on our Intranet. Mandatory annual training and attestations to the code are monitored and documented.

Additionally, we provide periodic training to First Data employees to help ensure that they are aware of their duties in terms of vendor selection, contracting, and oversight. This training covers, among other topics, roles and responsibilities, third party service provider life cycle information, oversight and accountability, risk management, operational information (e.g. onboarding and termination), best practices and available resources for managing a third party service provider relationship.



Senior Vice President, EMEA Financial Services