

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This Statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out Network Group's approach to dealing with the potential risk of human slavery and trafficking occurring within the Group's supply chains or any parts of our business.

INTRODUCTION

We, at Network Group, are strongly opposed to slavery and human trafficking and understands that we need to lead by example in the way we do business. We recognize that modern slavery is a crime and a violation of fundamental human rights. We aim to act fairly, ethically and openly in everything we do and are committed to ensuring that we and our supply chains are free from slavery and human trafficking.

OUR ORGANISATION

Network Group comprises a group of companies and is the leading enabler of digital commerce across the Middle East and Africa (MEA) region, providing a full suite of technology-enabled payments solutions to merchants and financial institutions of all types and sizes, including acquiring and processing services and a comprehensive ever-evolving range of value-added services. Network International Holdings Plc, the holding company for the Group, is listed on the London Stock Exchange.

OUR SUPPLY CHAIN

In order to provide services to our clients, we procure a range of goods and services from third party suppliers. We partner with a diverse group of suppliers, majority of whom are either technology or payments related suppliers. Based on the nature of our services and the goods and services we procure from third party suppliers, we believe that our risk of inadvertent involvement in slavery and human trafficking is low.

To ensure that we and our supply chains remain free of slavery and human trafficking issues, we have adopted the following controls:

A. POLICIES

The Group's management has communicated its commitment against slavery and human trafficking through the development of policies that clearly articulate management's guidance against such practices both within our business and by the suppliers that support our organisation. The details of these policies are as follows:

1. **Code of Conduct:** This code requires all Group employees to exemplify the highest standards of conduct and ethical behaviour and comply fully with all applicable laws and regulations. Third parties including our suppliers are also required to abide by this code and exemplify the same high standards expected of our employees.
2. **Whistleblower Policy:** The Group encourages all its employees, external consultants and contractors to report any concerns or wrongdoing at an early stage safely, anonymously and without the fear of reprisals. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Employees, external consultants and contractors who have concerns can report the matter using the following channels:
 - An anonymous 24-hour whistleblowing hotline and related online reporting channel, operated by an independent third party;
 - An e-mail address (EthicsReporting@network.global); and
 - A telephone line direct to the Chief Risk Officer & Group Company Secretary

3. **Group Vendor Management Policy:** The Group maintains a robust Vendor Management Policy, which requires the performance of due-diligence and identification of potential risk with the supplier engagement. This policy also focuses on an on-going monitoring of our suppliers which requires appropriate escalation and response to any activity that could be considered outside of the Group policies.
4. **Vendor Code of Conduct:** The Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, deploy ethical employment practices and comply within the law in their use of labour. The supplier must provide a confirmation that they and their supply chain do not practice modern slavery, human trafficking and child labour. Violations of the Group's Vendor Code of Conduct will lead to the termination of the business relationship.

B. SUPPLIER DUE DILIGENCE AND MONITORING

The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. As part of the assessment, the modern slavery and human trafficking risks are evaluated for each new supplier.

Once on-boarded, the suppliers are monitored on a regular basis. Ongoing monitoring includes re-performance of due diligence activities and regular on-site assessments of the identified suppliers. Conducting supplier audits or assessments depends on many factors including but not limited to high risk suppliers, usage of labour intensive methods to deliver services to Network, health and human safety practices employed by the supplier.

In addition to the above controls, the risk management and due diligence controls have been enhanced to the following effect:

a) CONTRACTING

Our standard terms and conditions for use with our potential suppliers include a reference to compliance with the Modern Slavery Act and an obligation on suppliers to respect all internationally proclaimed human rights laws including but not limited to, employing workers who meet the minimum legal age requirement for their country and not engaging in child or forced labour.

b) TRAINING

Regular training is imparted to our staff involved in supply chain management to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

This statement was approved by the Board of Directors of Network International Holdings Plc on 6 March 2023 and will be reviewed annually.

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Group Chief Executive Officer