

Modern Slavery Statement

Relevant Documentation

Pliant Group is committed to improving its practices to ensure slavery and human trafficking are not taking place in any part of our business. Pliant expects the same commitment from our suppliers, contractors and partners.

We take our obligations in this area seriously and address modern slavery and human trafficking risks through the following policies and practices:

1. The organisation's structure, its business and its supply chains;

Pliant Group, including all its parent company Pliant GmbH and subsidiaries, (Pliant OY and Pliant Payments Ltd) is a technology-led B2B payments and spend management company. Our supply chain primarily comprises software providers, professional services firms, data providers, outsourced service providers, and technology vendors. All vendor and third-party relationships are governed by our ESG Policy and the Pliant Code of Conduct for Vendors and Partners, which set out the standards we expect across our supply chain. Our ESG Policy applies to all Pliant employees, directors, contractors and third parties acting on Pliant's behalf.

2. Its policies in relation to slavery and human trafficking;

Our [ESG Policy](#) explicitly commits us to considering human rights, exploitation, and modern slavery risks in the onboarding and ongoing monitoring of suppliers and partners. The Policy further requires that Pliant avoids facilitating activities linked to corruption, organised crime or social harm- which encompasses the financial crime risk associated with human trafficking through our payments infrastructure.

Our [Pliant Code of Conduct for Vendors and Partners](#) explicitly prohibits all vendors and partners from using or contributing to slavery, servitude, forced or compulsory labour, exploitation, or human trafficking. All suppliers and partners are required to comply with environmental, labour, human rights and governance standards, cooperate with Pliant's due diligence and monitoring, and notify Pliant of any ESG-related incidents.

Our reinforces these protections by prohibiting bribery, facilitation payments, and corrupt practices that could be used to enable or conceal trafficking and forced labour arrangements. It requires enhanced due diligence on third parties operating in high-risk jurisdictions, ensures staff are obligated to report any suspicious activity, and assigns senior-level accountability for compliance - collectively reducing the risk that Pliant's operations or relationships could, directly or indirectly, contribute to modern slavery or human trafficking.

3. Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;

Modern slavery and human trafficking risks are embedded into our onboarding and ongoing monitoring of vendors through our ESG Rating Methodology (Appendix 1 of our ESG Policy). Every client and vendor is assessed against a structured checklist that includes:

- **S1 - Workforce jurisdiction check:** As part of our due diligence and enhanced due diligence processes, we assess the country of operation of our third parties, suppliers, customers and, where relevant, their key suppliers, to identify potential exposure to forced labour and modern slavery risks. This assessment is based on recognised risk indicators and informs the level of scrutiny and monitoring applied.
- **S2 - Adverse media check:** Adverse media screening is conducted using publicly available sources (e.g. Google News), subscription databases (e.g. LexisNexis), and specialised resources (e.g. Business & Human Rights Resource Centre) to identify potential labour rights, discrimination, and health & safety concerns.
- **Social — labour source check:** As part of the social risk assessment, relevant external sources (e.g. UK Modern Slavery Registry, UN Global Compact) may be consulted, where applicable, to support the identification of potential labour and human rights risks.

These checks are applied proportionately across three tiers based on size and regulatory status, ensuring appropriate depth of scrutiny for all third-party and client relationships.

4. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;

As a technology-led B2B payments and spend management company, we recognise that our risk profile spans our direct operations and our supply chain. Within our direct operations, we consider the risk of modern slavery to be low. However, we acknowledge the following higher-risk areas:

- **Vendors** - we conduct ESG assessments of vendors, including specific checks for modern slavery and labour rights risks. Vendors operating in high-risk sectors or jurisdictions are subject to enhanced scrutiny. Vendors rated 3 (Medium) require senior compliance sign-off; vendors rated 4 (High) require MLRO referral; and vendor rated 5 (Very High) are not onboarded.
- **Financial services** - as a B2B payments provider, we recognise that payment infrastructure can be exploited in connection with modern slavery and human trafficking. We mitigate this through our AML/CTF controls, customer due diligence processes, and transaction monitoring, designed to detect and prevent financial flows linked to criminal activity, including human trafficking.

We continuously assess these risks as part of our broader compliance and ESG frameworks.

Any identified concerns can be raised via our [Whistleblowing Policy](#).

