

2023



# Anti-Forced Labour Annual Report



## Anti Forced Labour Report

Reporting Year: January 1, 2023 – December 31, 2023

### INTRODUCTION

This Anti-Forced Labour Report (“Report”) is filed on behalf of Moneris Solutions Corporation and Moneris Services Corporation (referred to collectively as “*Moneris*”). Moneris is filing this as joint report for both entities.

Moneris recognizes the importance of eradicating forced labour from global supply chains. As a Canadian business, Moneris adheres to Canadian laws for combatting forced labour, including the ***Fighting Against Forced Labour and Child Labour in Supply Chains Act*** (the “Act”). Moneris understands that its business operations can have far-reaching impacts and is committed to ensuring that it does not contribute to this exploitation.

This report highlights Moneris’ efforts to identify, address, and mitigate forced and child labour risks within its operations and supply chain, as well as plans for continuous improvement.

### OUR BUSINESS AND STRUCTURE

Moneris is a Canadian payment processing company, specializing in providing merchant services, including credit, debit, and other payment processing solutions. Moneris offers a range of services such as point-of-sale (POS) systems, e-commerce, restaurant and retail solutions, mobile payment options, hardware, and other value-added services to businesses of all sizes.

### OUR SUPPLY CHAIN

Moneris is committed to partnering with suppliers who share Moneris values and standards. Moneris conducts risk-based due diligence to identify suppliers who also take steps to effectively assess their own businesses and supply chains.

Moneris has developed a comprehensive Supplier Risk Management program. This program involves assessments, prior to and throughout the course of our relationship with suppliers. We undertake a risk-based due diligence process to evaluate risks associated with suppliers. Additionally, applicable supplier contracts incorporate specific terms and conditions mandating adherence to all applicable laws and regulations in the provision of goods or services.

Moneris maintains oversight of our supplier relationships standards through a governance framework maintained by Moneris’ Chief Risk Officer.

### RESPONSIBILITIES AND RELEVANT POLICIES

***Moneris Code of Conduct***: Moneris maintains a Code of Conduct (the “Code”) to which all employees are required to read, understand and attest their compliance on an annual basis. The Code encompasses the principles of how we conduct our business, how employees are expected to conduct themselves, and addresses a variety of potential ethical and legal concerns.

In addition to the Code, Moneris is developing an Anti-forced Labour Policy and Supplier Code of Conduct to further support our commitment to combatting forced labour.

**Supplier Management Policy:** This policy sets a risk-based approach for reviewing and assessing suppliers including partners. It also outlines procedures for managing suppliers within our supply chain, including criteria for conducting due diligence and establishing expectations for supplier conduct.

**Anti- Money Laundering Policy:** This policy outlines measures and procedures implemented by Moneris to detect and prevent illegal activities of money laundering and terrorist financing. This policy indirectly supports managing risk in the supply chain as it helps with due diligence by identifying high-risk entities and risky transactions by monitoring and reporting suspicious transactions that may be connected to organized crime.

**Prohibited and High-Risk Merchant policy:** This policy sets out guidelines for determining which merchants or business activities are considered prohibited or high-risk for processing payments. Merchants who are involved in illegal, PCNO prohibited/restricted and other identified activities (e.g. adult content) are prohibited merchants which helps mitigate risks of supporting forced labour in commonly exploited areas.

**Whistleblower Policy:** This policy sets out guidelines and procedures to encourage employees to report of any suspected misconduct, unethical behaviour or violation of any laws and/or company policies, on any level, and protect reporting employees from inappropriate or prohibited consequences. This policy helps promote transparency, integrity, and accountability by providing anyone at Moneris a mechanism to speak up anonymously.

## **RISK ASSESSMENT AND DUE DILIGENCE**

All of the above policies involve risk assessment and due diligence practices. As part of our supplier management program, Moneris conducts risk-based due diligence on new and existing suppliers to ensure they represent acceptable risk to Moneris. In addition, as part our risk assessment efforts for certain key suppliers of products we distribute to merchants, we seek assurances of their sustainability practices, including their labour, human rights, and ethical practices.

## **TRAINING**

Moneris recognizes that awareness and education are essential in combatting forced labour. Moneris conducts risk-based training on our corporate policies, designed to ensure appropriateness and effectiveness in addressing potential risks.

## **REMEDIATION PROCESS**

Currently, there are no identified remediation needs within our supply chain. However, we are committed to ongoing assessment and improvements.

## **MEASURING OUR EFFECTIVENESS IN COMBATING FORCED AND CHILD LABOUR**

Moneris has a Compliance team that assesses compliance with payment card network prohibited and restricted merchants, and an Internal Audit team that provides independent assurance over effectiveness of compliance with the policies noted above and general effectiveness of controls. The current

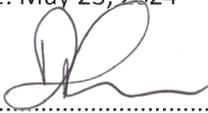
assessments are designed to identify gaps in compliance with laws, AML, payment card network prohibited merchants, etc.

Moneris is committed to transparency and accountability to combatting forced labour across our operations and supply chain. We recognize that this is an ongoing journey, and we are committed to continuous improvement and collaboration with stakeholders to achieve this goal.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

Full name: Dev Srinivasan, Chair of the Board, Moneris Solutions Corporation

Date: May 23, 2024

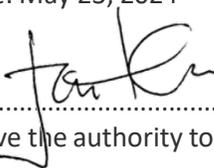


.....  
I have the authority to bind Moneris Solutions Corporation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

Full name: James Hicks, Director, Moneris Services Corporation

Date: May 23, 2024



.....  
I have the authority to bind Moneris Services Corporation