



Modern slavery statement 2025



Message from the CEO

“Modern slavery is a crime that persists even today, and it represents one of the worst violations of human rights. We at Pay.UK continue to have zero tolerance for this; this goes to the heart of the ethical and honest way in which we operate.

We must be aware of, and combat, the risks of modern slavery within Pay.UK, its subsidiaries, and in our supply chain at all times. That way, we will ensure that we do not knowingly perpetuate or work with anyone involved in modern slavery.

We start with our colleagues. Through mandatory training, compliance with our policies, and living our values, we continue to implement our commitment to operating ethically and with integrity by ensuring that our colleagues are able to recognise and report concerns relating to modern slavery and human trafficking. We have established a Third- Party Risk Management Framework, to help manage our suppliers to identify and mitigate the risks of modern slavery in our business and supply chains.

Together, this demonstrates how seriously we take modern slavery and our continued commitment to mitigate the risks of this unacceptable exploitation”.

David Pitt

Chief Executive Officer



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Chief Executive Officer



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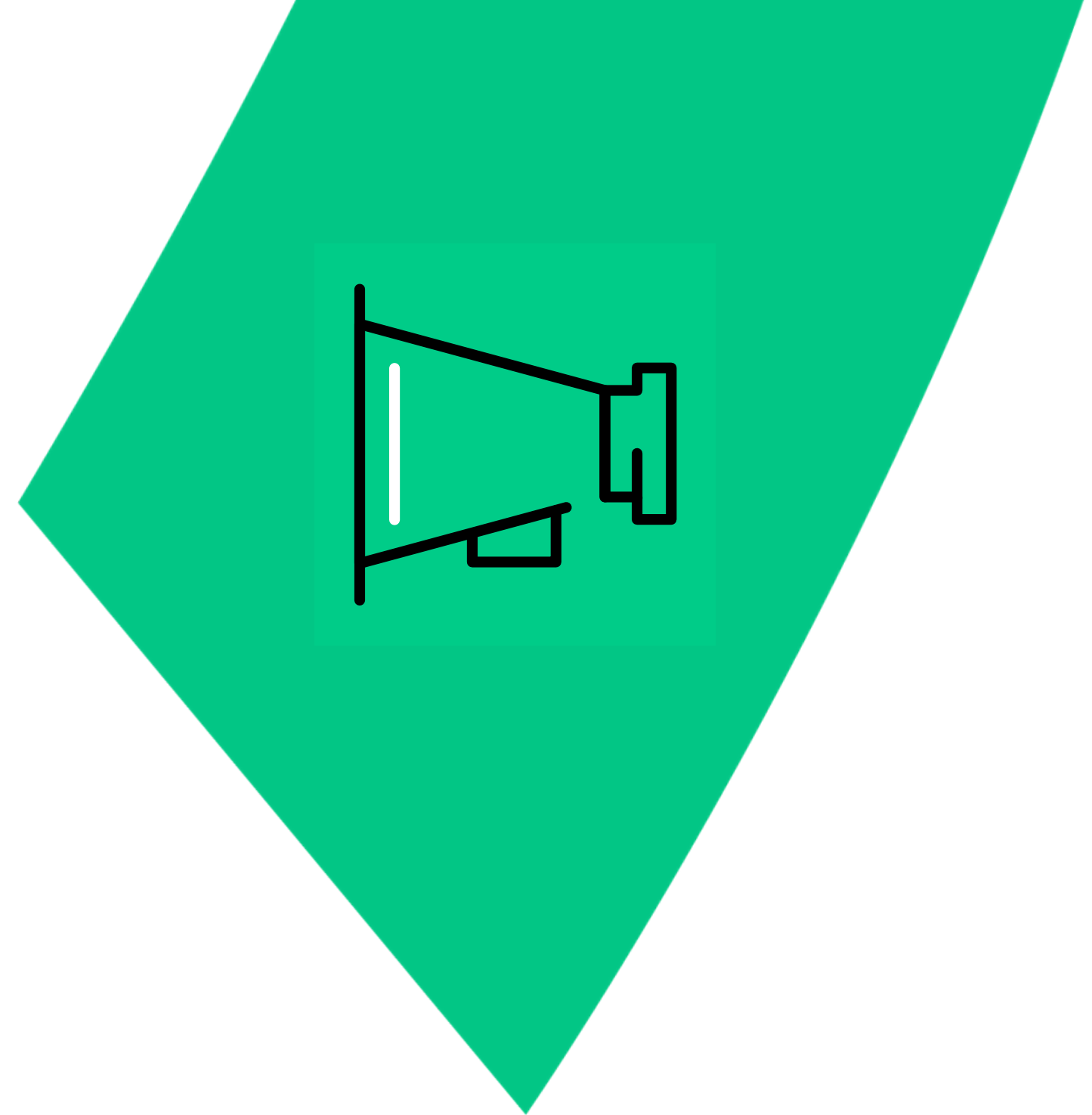
Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms and occurs when a person deprives another of their liberty in order to exploit them for personal or commercial gain.

At Pay.UK Limited (Pay.UK), we, together with our subsidiaries (Pay.UK Group), are committed to playing our part in helping prevent any incident of modern slavery in any part of our business.

We have a zero-tolerance approach to modern slavery and are committed to implementing, improving and enforcing effective systems and controls to make sure modern slavery and human trafficking is not taking place anywhere within our business or in any of our supply chains.

This is the seventh statement issued by Pay.UK in accordance with section 54(1) of the Modern Slavery Act 2015 (the Act) and applies to the Pay.UK financial year ending 31 December 2025. Our statement sets out the steps we have taken and are going to take to help prevent and detect any incidents of modern slavery occurring within our business. This statement was approved by the Pay.UK Board on 20 May 2026.



Key initiatives in financial year 2025

During the course of 2025 we have continued with our business operations which include addressing the potential risk of slavery and human trafficking within our business and our supply chain. The key enhancements that we have made specific to the risk of slavery and human trafficking were:

- **SafeToSay.UK Whistleblowing Policy and ‘Ethics Helpline’**

We have updated and strengthened our whistleblowing framework to support a culture of transparency and accountability across our whole business. Colleagues, contractors and third parties can raise concerns internally and externally without any fear of retaliation.

- **Supplier management**

We continued to mature our approach to managing our suppliers through our third-party risk management framework and policy. We assess the inherent risk of a third-party relationship at the outset and provide assurance in a proportionate manner. We have focused on embedding robust supplier management controls and driving continuous improvement in how both current and new suppliers are overseen by us.



About Pay.UK

Pay.UK is the recognised operator and standards body for the UK's retail interbank payment systems. We provide the digital payments networks used by the UK's banks, building societies, other payment providers and all their customers to make payments, ensuring they are secure, safe and simple to use.

Our organisation structure and operations

Under the Code of Practice published in accordance with section 189 of the Banking Act 2009, Pay.UK performs the role of the systemic risk manager for the payment systems we operate in order to support the financial stability of the payments sector.

Pay.UK Limited and Pay.UK Group are regulated by the Bank of England, Financial Markets Infrastructure Directorate (FMID) and the Payment Systems Regulator (PSR). We operate three of the UK's interbank retail payment systems:

- (i) the Bacs Payment System (Bacs)
- (ii) the Faster Payment System (FPS)
- (iii) the Image Clearing System (ICS).

Both the Bacs and FPS are recognised by HM Treasury in accordance with section 184 of the Banking Act 2009. As a result, Pay.UK's operation of these payment systems is subject to macroprudential regulation by the FMID.

We are based in the United Kingdom, operating in sterling only transactions and, as of 31 December 2025, we had 348 employees (consisting of permanent and fixed term contract colleagues). During this period, our Board was advised by two independent Councils: the End User Advisory Council and Industry Advisory Council; these councils worked on behalf of end users and customer communities in the UK, ensuring that we remain true to our responsibilities and discharge our objectives effectively.

Our subsidiaries are also based in the United Kingdom. All active subsidiaries are listed below:

- Bacs Payment Schemes Limited
- Cheque and Credit Clearing Company Limited
- UK Payments Administration Limited
- Mobile Payments Service Company Limited
- Faster Payments Service Limited
- Universal Trust Service Providers Limited.



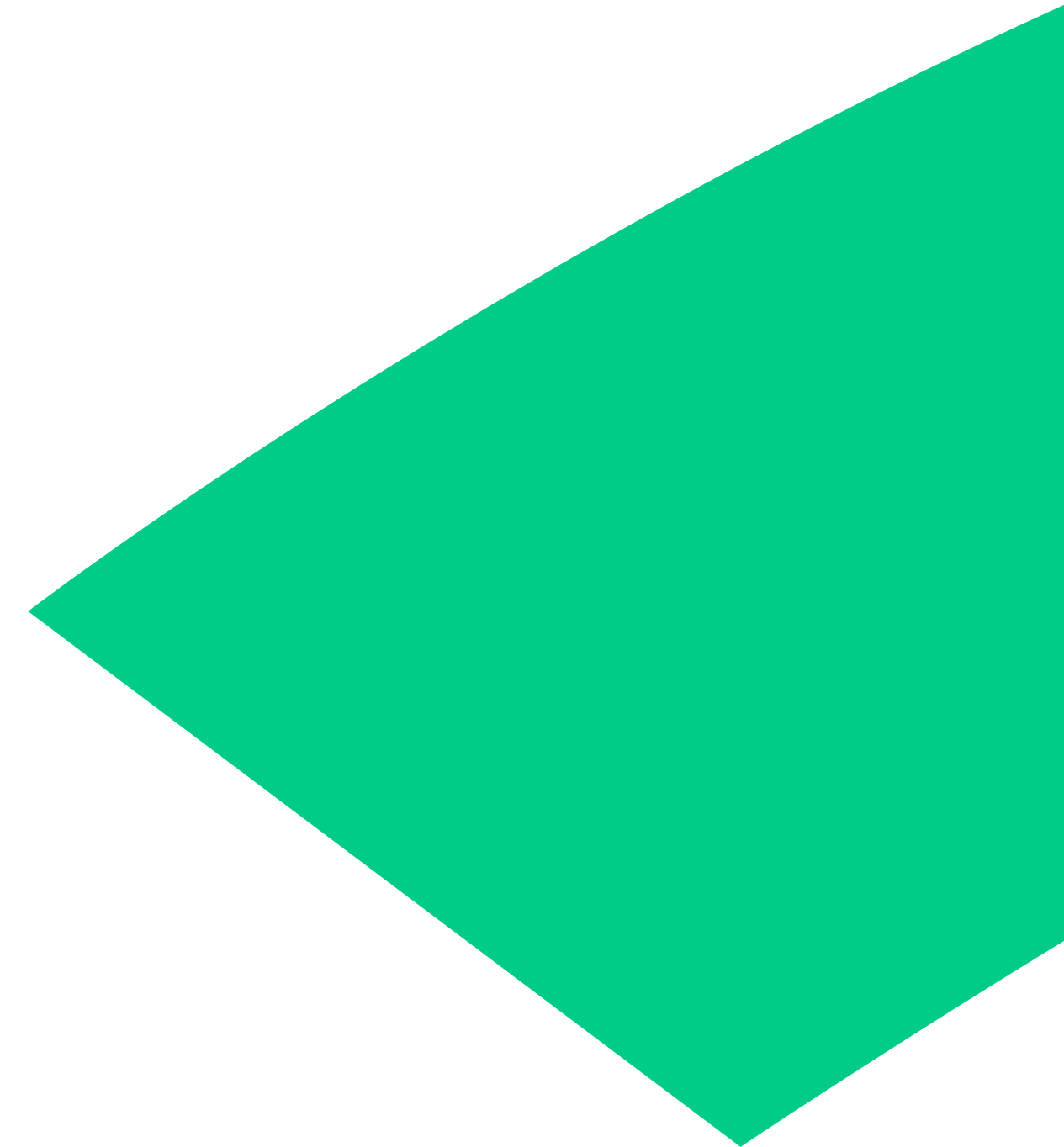
Our approach to respecting human rights: modern slavery

Pay.UK is committed to making sure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Pay.UK understands slavery and human trafficking is an abhorrent abuse of human rights, and we continue to work towards the improvement of our systems and controls to detect, prevent and monitor this. Pay.UK acts ethically and with integrity in all our business relationships and we expect the same standards from all our contractors, suppliers and other business partners.

Pay.UK understands the risks our organisation could be exposed to, including slavery and human trafficking. We are guided by the government statutory guidance [“Transparency in Supply Chains: A practical guide”](#) on how to mitigate against the risk of modern slavery and human trafficking taking place within our organisation or in any of our supply chains. Risks associated with modern slavery is reported to Pay.UK’s Risk Committee and escalated to the Pay.UK Board, as necessary.

At Pay.UK, we are committed to building a brighter future for all, which means, together with our suppliers, playing a leading role in the UK’s transition to a modern, resilient and sustainable economy.

Our efforts to respect human rights underpin the way we do business, seeking to act fairly across our business and supply chains when engaging with stakeholders. We recognise the everchanging nature of the business landscape and the ongoing challenges modern slavery poses in many forms. The evolving nature of this challenge requires us to be proactive in our efforts to ensure that modern slavery does not take place anywhere in our business and supply chains.



Our colleagues

Our colleagues play a vital role in maintaining robust and resilient payment services, encouraging innovation within retail payments, and supporting the wider retail payments ecosystem.

We are committed to:

- Maintaining trust in the certainty, integrity and security of our services and interactions with all clients, end-users, regulators, stakeholders and our colleagues.
- Nurturing our people to drive industry innovation, creating relevant, competitive, useful and end-user focused payment solutions.
- Attracting, developing and retaining talented leaders and colleagues who, in line with our culture, principles and values can deliver excellence.

To enable a vibrant UK economy and deliver best in class payment infrastructure and standards, we continue to emphasise our core values and hold our colleagues to account for these:

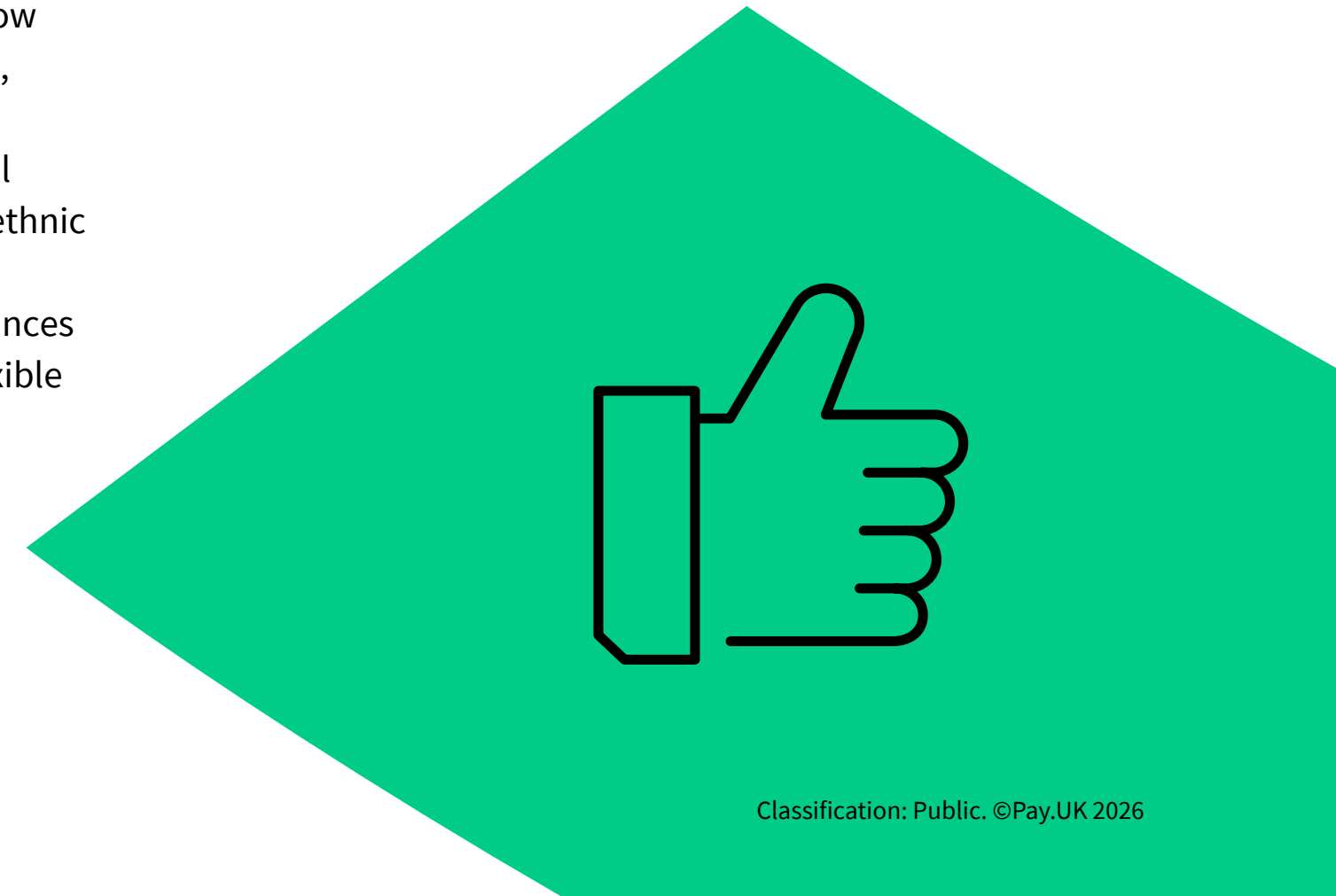
- We are Transparent
- We are Respectful
- We are Inclusive
- We are Curious
- We give Constructive Challenge.

Pay.UK has established a standard set of behaviours which underpin how colleagues are expected to demonstrate our values:

- Listen to find win - wins
- Influence with courage
- Go horizontal first
- Take ownership
- Opportunity mindset
- Simplify.

Our core values and behaviours embody Pay.UK's ethos and, together with our policies and vision, set the tone for how we operate. We do not tolerate unlawful discrimination, bullying, or harassment on any grounds, including sex, gender reassignment, sexual orientation, marital or civil partnership status, race (including colour, nationality, ethnic or national origins) religion or belief, age, pregnancy or maternity leave, disability, or other domestic circumstances such as employment status, working hours or other flexible working arrangements.

Pay.UK performs pre-employment screening on all colleagues (and third-party contractors or consultants where required), which includes verification of identity, criminal record and UK right to work checks. These checks are underpinned by our immigration framework which supports our recruitment and onboarding processes and procedures. Additionally, colleagues undergo re-vetting every three years. We also conduct enhanced vetting on senior colleagues whose roles have greater accountability and responsibility.



Our continued commitment

Policies in relation to slavery and human trafficking

Our internal policies are essential for the organisation and form part of the core internal controls we use to manage our day-to-day business. The policies and associated procedures cover several key areas such as, anti-slavery and human trafficking, whistleblowing, recruitment and onboarding, security & screening and anti-bribery and corruption. We require all colleagues to understand and actively comply with our policies. Our policies are regularly reviewed to ensure that they remain fit for purpose and aligned to our current business and regulatory landscape.

We continue to apply our Equal Opportunities Policy at all stages of our recruitment and selection process, including monitoring the equality of the candidate pipeline and report to the Executive Committee any areas of challenge to ensure we maintain a diverse workforce.

We shortlist, interview and select candidates with no regard to sex, gender reassignment, sexual orientation, marital or civil partnership status, race, (including colour, nationality, ethnic or national origins), religion or belief, age, pregnancy or maternity leave or trade union membership. Our Diversity, Equity & Inclusion Policy further sets out our inclusive practices such as diverse interview panels, flexible working and mentoring programmes. Once appointed, we remunerate our colleagues appropriately in accordance with industry benchmarks and undertake regular reviews. Colleagues are encouraged to keep their equality data updated so that we can monitor the diversity of our workforce.



Our supply chain

Due diligence and third-party risk management

We have a Third-Party Risk Management Framework, that we use to guide how we manage our suppliers. This framework covers the full lifecycle of a relationship from sourcing, throughout commercial management, to exit management. When we onboard our suppliers, we conduct due diligence for business critical and high-risk suppliers using a third-party provider. The checks include real-time screening on an ongoing basis and cover adverse news, sanctions and enforcement screening, state-owned enterprise screening and politically exposed persons screening. Additionally, during any tender process for our Tier 1 – Tier 3 suppliers, we request confirmation that a modern slavery statement is in place (where applicable).

Our suppliers

Our suppliers range from IT system and hardware providers, accountancy firms, law firms, marketing agencies, large consultancies, recruitment agencies and personal service companies. Most of our suppliers are based in the UK.

We continue to require all our suppliers and sub-contractors to comply with the Modern Slavery Act 2015, and this is articulated within our contract terms. In addition, we expect our suppliers to implement steps within their own organisations that assist in combatting modern slavery within their businesses and supply chains to the extent that is required by the applicable laws and regulations.

Our participants

Our participants are organisations that directly or indirectly use our products to deliver services to end users and consist of Payment System Providers (PSPs) authorised by the Financial Conduct Authority and/or the Prudential Regulation Authority, and include banks and non-bank PSPs, such as authorised e-money institutions. As part of the onboarding process, participants are expected to meet requirements placed upon them by their regulator(s) and the Bank of England. We recognise that our participants who use our payment systems, have the potential to be indirectly/inadvertently involved with those who seek to exploit their services in respect of modern slavery and human trafficking. We expect all our participants to comply with all applicable laws and regulations, which includes having the relevant processes and procedures in place to combat/mitigate these risks as required by their regulators.

In accordance with our participation agreements, participants of Pay.UK systems are expected to comply with UK laws and regulations. This includes meeting the requirements of section 54 of the Modern Slavery Act (publication of their modern slavery statement) as well as implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within their business or in any of their supply chains.

Training and awareness

All colleagues at Pay.UK are required to complete mandatory training when they join and must also complete annual refresher training. We are continually enhancing our internal training for all colleagues to supplement training around key areas, such as:

- Modern slavery
- Bribery prevention
- Fraud prevention
- Anti-harassment and bullying.



Our future plans

We are committed to continuously strengthening our policies, processes and procedures where exposure to modern slavery risks may be higher and to embedding these within our business and supply chain. Our executive management team and board have approved the following plans in respect of mitigating the risk of modern slavery and human trafficking:

SafeToSay.UK whistleblowing training

We will continue to raise awareness of the 'Ethics Helpline' across the business and will develop bespoke whistleblowing training for all colleagues to aid their understanding on how to raise concerns.

Third party assurance

For all Tier 1-3 suppliers, we have implemented an assurance process, where we will periodically check several factors, with one of them being reviewing their modern slavery statements and assuring them against the Home Office Statutory Guidance. In the event of any material gaps, we will flag this within the Third-Party Assurance Report.

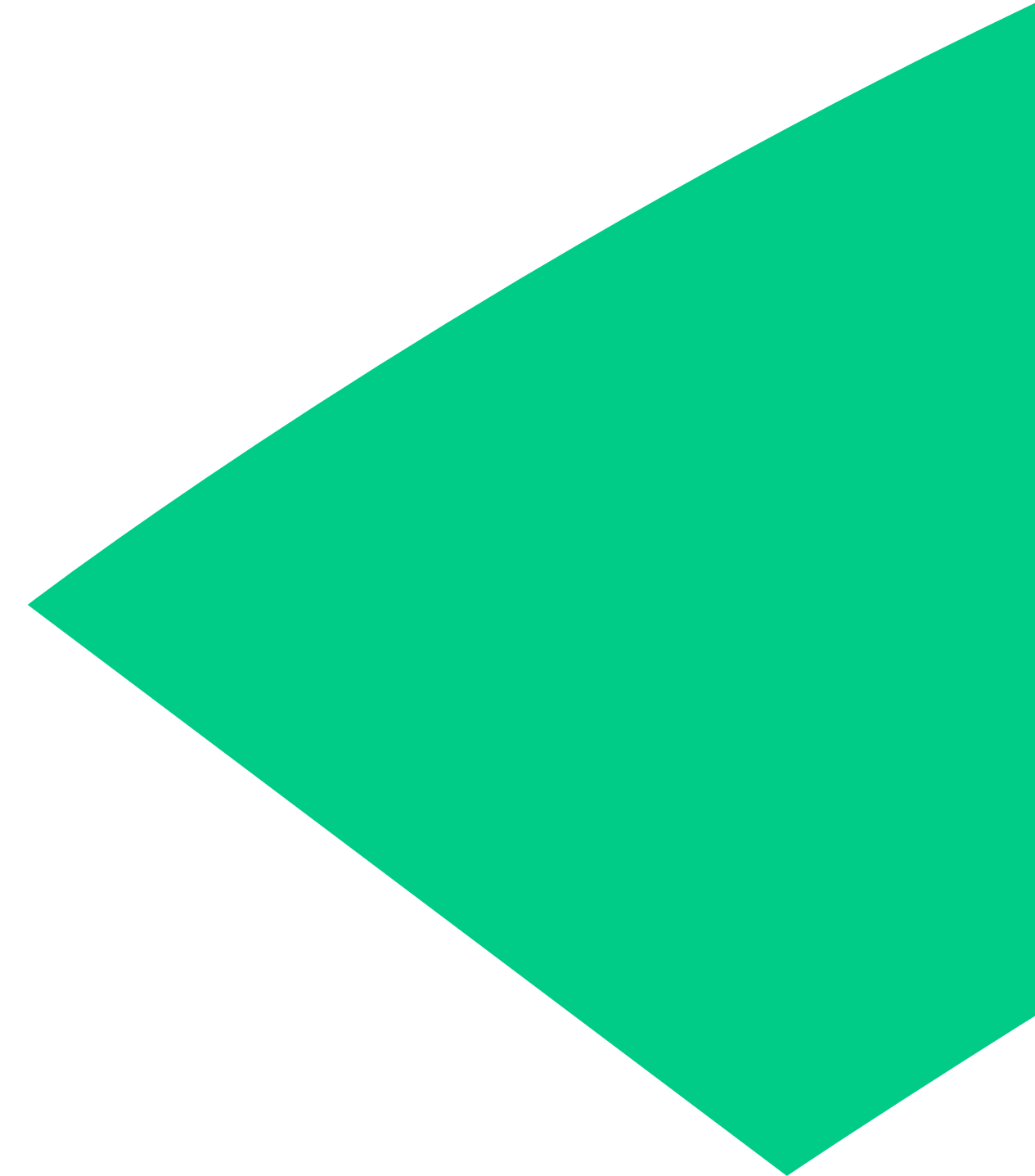
This will ensure that all procurement and third-party risk management activities are conducted in an honest, competitive, fair, and transparent manner, and that suppliers are appropriately managed on an ongoing basis.

Real living wage

As a voluntary initiative, we will continue our journey to become an accredited 'Real Living Wage' employer and join other organisations in paying at least the minimum salary to our employees in line with the Living Wage Foundation's recommendations.

Publication of modern slavery statement

As part of our commitment in demonstrating that we have met our legal obligations, we plan to publish our modern slavery statement to the Modern Slavery Statement Registry voluntarily.



Governance

This statement has been considered by the Executive Committee before approval by the Board of Directors.

Signed on behalf of the Board of Directors of Pay.UK Group.

Mark Hoban
Chair, Pay.UK Limited