



Trustly's Modern Slavery and Human Trafficking Statement 2021

This statement is made in accordance to the Modern Slavery Act 2015. It outlines the steps that Trustly AB (publ) (together with its direct and indirect subsidiaries, hereinafter referred to as “Trustly”, “we” or “us”) has taken and will continue to take to ensure modern slavery or human trafficking is not practiced within our business.

The term "modern slavery" is used to describe situations where a person is deprived of their liberty in order to exploit them for personal or commercial gain. It is a criminal offence and a violation of human rights and can take a number of forms, including slavery, forced or compulsory labour, servitude, human trafficking, traffic in prostitution and trafficking for exploitation.

At Trustly, we recognize and honour the right for every person to freely give his or her labour and for each employee to leave his or her employment. We are committed to ensuring that we do not, directly or indirectly, make use of any work or service which is extracted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. We take a zero-tolerance approach to modern slavery. Should we identify any modern slavery issues in our supply chain, we will seek to engage with that supplier to address those issues .

About Trustly

Founded in 2008 and headquartered in Stockholm, Sweden, Trustly is the leading global payments platform for account-to-account transactions. We serve more than 8,000 merchants, connecting them with 525 million consumers and 6,300 banks in over 30 countries.

Trustly has more than 600 employees across Europe, North America and Latin America. We are a licensed Payment Institution under the second payment services directive (PSD2) and operate under the supervision of the Swedish Financial Supervisory Authority in Europe.

This statement is made on behalf of Trustly AB (publ) and its subsidiaries, including but not limited to Trustly Group AB and its UK subsidiary, Trustly UK Limited. Trustly UK Limited was launched in 2016 and has approximately 15 employees working from our London office.

As Trustly provides an online service, where most of our employees are employed directly by our organization, we consider the risk of modern slavery to be low.

Our commitment to the Modern Slavery Acts 2015

Trustly is committed to preventing modern slavery and human trafficking in its business and supply chains. At all times, Trustly conducts its business in compliance with all legislation and regulations that are relevant to our business within the countries that we operate. Through the past financial year, Trustly has continued to apply governing documents (global and local policies, procedures and instructions) that assist us in preventing modern slavery or human

trafficking in our business and supply chains. We require employees and third parties with whom we engage, to comply with these policies.

The governing documents lay out processes for employees and third parties to raise concerns in relation to any identified suspected non-compliance, and confirm that employees will not suffer any detriment for raising concerns in accordance with the governing documents. We have not received any reports of potential slavery or human trafficking in our business or supply chains in the past year.

These governing documents include, but are not limited to:

- Employee Code of Conduct
- Supplier Code of Conduct
- Whistleblowing policy
- Employee Handbook

Our supply chain

We have implemented and maintain effective systems and controls to ensure that everyone in our business and supply chain is treated with dignity and respect. We are committed to upholding high ethical standards, and promoting safe and fair working conditions.

Notably, we have continued to require compliance with our Supplier Code of Conduct, which helps to, among other things, identify any modern slavery and human trafficking risk areas. We also conduct due diligence on our supply chain, as part of our procurement processes, to highlight modifications that can be made to identify and prevent modern slavery issues arising.

Compliance with applicable policies is a requirement of our employee terms of employment and our contracts with third parties, including contractors, partners, merchants, suppliers, external consultants, and third-party representatives, regardless of where they are operating. Any reported breach of applicable policies will be investigated and may lead to disciplinary action and dismissal (for employees) and remedial action and/or termination of third-party contracts.

Duty to report

It is the responsibility of all those working for us or under our control to report any concerns of potential modern slavery in our business or supply chains. If you have any concerns or suspicions that modern slavery may be present in any part of our business or supply chains, you are encouraged to report it at the earliest possible stage through the Whistleblowing channel, or directly to the Compliance Officer or the Chief Legal and Regulatory Affairs Officer.

Training

We are committed to providing training on our approach to modern slavery to all staff in our organization, as part of our Code of Conduct training. We intend to undertake this training in the coming year.



This statement was approved by the board of directors of Trustly AB (publ) on 27 August 2021 and is made in respect of the financial year ending 31 December 2021.