



# Modern Slavery and Human Trafficking Statement

Version 4 | 03 November 2022  
For public use

[eMerchantpay.com](https://eMerchantpay.com)

## INTRODUCTION

At emerchantpay our mission is to deliver a more profitable economy for our customers, empowering them to make the most out of their online revenue. emerchantpay is a value-driven organisation that stands for agility, efficiency, honesty and excellence.

As an experienced provider of payment services and solutions worldwide, we aspire to meet the highest professional, legal, and ethical standards. We stand for the protection of internationally proclaimed human rights, the eradication of human trafficking, ending all forms of forced and compulsory labour and the effective abolition of child labour. We recognise the fundamental role of the business sector in promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all as set out in the 2030 Agenda for Sustainable Development.<sup>1</sup>

emerchantpay acknowledges responsibility to the Modern Slavery Act of 2015 ('**MSA**') and will continue to ensure transparency within the organisation and our supply chain.

The **MSA** requires a statement to be published each year describing the steps taken to ensure modern forms of slavery and human trafficking are not taking place in the firm's business operations and supply chains or a statement that such steps have not been taken.

This statement is made pursuant to section 54(1) of the MSA and constitutes emerchantpay's annual Modern Slavery and Human Trafficking (**MSHT**) statement for the **financial year ending 31<sup>st</sup> August 2022**. It describes the steps taken to guarantee that slavery and human trafficking are not taking place in any part of our business or our supply chain.

## OUR BUSINESS

emerchantpay Ltd. is an authorised electronic money institution under the supervision of the Financial Conduct Authority.

The firm has permission to issue electronic money (e-money) and provide the following payment services: services enabling cash placement on a payment account; services enabling cash withdrawals from a payment account; execution of payment transactions (not covered by a credit line); execution of payment transactions (covered by a credit line); issuing payment instruments or acquiring payment transactions; money remittance; execution of payment transactions via telecoms, IT system or network operator; issuing electronic money.

We provide our products and services and run the permitted activities from the UK.

## OUR STRUCTURE

emerchantpay's registered office is in Tyne and Wear, England with its main business address in London. The firm is wholly owned subsidiary of emerchantpay Group. Some of the firm's critical or important functions have been outsourced to companies within the emerchantpay Group.

The firm has an annual turnover in excess of USD **150** million and a financial year ending on the 31<sup>st</sup> August.

The main responsibilities for fulfilling the obligations that stem from the MSA are entrusted to:

- **firm's directors** – to supervise the process of drafting and decide on the statement's approval;
- **senior management** – to implement the objectives of the statement and to provide adequate resources (such as trainings) to ensure that MSHT is not taking place within the firm and its supply chain;
- **compliance function** – to develop, review and update annually the Modern Slavery and Human Trafficking Statement as well as to carry out the related training activities;
- **the staff members** – to be alert to the MSHT risk and to report their concerns.

---

<sup>1</sup> UN General Assembly, *Transforming our world: the 2030 Agenda for Sustainable Development*, 21 October 2015, A/RES/70/1.

## OUR SUPPLY CHAIN

emerchantpay's supply chain consists primarily of other regulated service providers. Further, we use information and communications technology (ICT) services, resellers' services, professional advisory services, marketing services, employee benefits program, as well as travel/accommodation services and office supplies. It is important to note that emerchantpay does not manufacture products or handle raw materials or commodities.

Given emerchantpay's understanding of our supply chain and the nature of our business, we believe the overall risk of MSHT in connection with our firm's activities is very low due to:

- the nature of the services which we procure (mostly payment services),
- the locations from which we procure it (mostly in developed markets), and
- our procurement practices (for example, we agree to reasonable terms and ensure timely payment).

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We continue to operate a number of internal policies and practices to ensure that we are not in any way involved with or facilitating MSHT. Our policies comprehensively describe our approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in our operations.

We are committed to ensuring that we conduct our business in an ethical manner and there is no MSHT involved in any way with our supply chain or in any part of our business.

Our internal policies reflect our commitment to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure MSHT is not taking place anywhere in our supply chain.

We have several policies in place relevant to modern slavery—all of which are signed off at the director's level. This includes our Principles of business, Code of conduct (for employees), Code of conduct (for partners/suppliers), Equality policy and Whistleblowing policy.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have embedded additional risk checks for modern slavery in our due diligence process to partners/suppliers. The relative risk for each potential partner/supplier is determined based on risk assessment. Among others, each potential partner/supplier is checked against global sanctions and enforcement databases, and adverse media review is performed to identify risks including human rights abuses, human trafficking, and labour violations. Those potential partners/suppliers identified as medium or high risk are subject to further vetting.

## RISK ASSESSMENT AND RISK MANAGEMENT

Given the nature of our business, we believe that there is minor risk of MSHT taking place and our risk-based processes reflect this.

Based on our risk assessment, the potential risk of MSHT may arise from the following key scenarios:

**The MSHT risk associated with recruitment process:** The majority of our workforce are employed directly and on permanent basis. Recruitment takes place through direct advertising on our website, reputable employment agencies, referrals from employees within our firm. We also carry out appropriate background checks, including eligibility to work in the UK or in the EU, for all applicants and current employees in order to identify potential human trafficking or individuals being forced to work against their will.

**The risk that we procure products/services for our own use where there is an unethical supply chain:** This risk is mitigated by using partners/suppliers demonstrating compliance with the regulatory requirements, including MSA.

**The risk that we partner alongside organisations with an unethical supply chain:** This reputational risk is mitigated by an up-front compliance requirement, enforced at delivery by contractual conditions and agreements; and including appropriate early-termination clauses.

During the financial year ending 31<sup>st</sup> August 2022 we have:

- paid our staff fairly for their work and above the minimum living wage;
- acted ethically and with integrity in all our business relationships;
- raised awareness of the requirements of the Modern Slavery Act;
- widened our assessment process and identified a new area of potential supply chain risk;
- identified an additional training requirement to increase risk awareness within our workforce;
- provided an interim risk assessment and progress report within-year to our Directors and Management committee.

emerchantpay understands that MSHT risk is not static, therefore we will continue to mitigate this risk during the current financial year to ensure our systems and controls continue to be effective in safeguarding against any form of modern slavery taking place within our business or our supply chain.

In addition to the steps we have already set out above, we:

- remain committed to improving our practices in order to ensure that there is no MSHT in any part of our business or in our supply chains;
- will continue assessing the issues of MSHT within our organisation and the effectiveness of our approach to managing them on a periodical basis;
- will continue assessing and interpreting any recent or emerging case law and best practice;
- will engage further with the Office of the Independent Anti-Slavery Commissioner ([IASC](#)) and the Gangmasters and the Labour Abuse Authority ([GLAA](#));
- will benchmark our activities against statements and action plans undertaken by similar-sector organisations.

## TRAININGS

The firm provides orientation training (up to 14 per year for all newcomers) and annual training (for all employees) that raise awareness on understanding MSHT, whistleblowers' status and protection along with learning about the full spectrum of the compliance function. Among others, the annual training puts an emphasis on the link between human trafficking as a predicate offence to money laundering and evaluated the employees' understanding of all learning objectives via tailor-made assessment test.

## SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to MSHT, and we fully support the government's objectives to eradicate it.

We require all partners/suppliers we engage with to ensure that their products/services and supply chains:

- fully comply with the Modern Slavery Act 2015; and are
- transparent, accountable and auditable; and are also
- free from ethical ambiguities.

Our contracts with any partners/suppliers generally include terms which require them to confirm compliance with the applicable regulatory requirements, including MSA.

We call upon all partners/suppliers we engage with to influence their global supply chains by improving transparency and accountability.

## COMPLIANCE

No reports were received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified within our business activities during the last financial year. COVID-19 did not impact the ability of our employees to access grievance procedures nor the firm's ability to identify and address possible modern slavery risks in our operations and supply chain.

## APPROVAL

This Statement was approved by the Directors of emergentpay on **03 November 2022** and signed by the Director Mr. Stephen Dickson.

## FURTHER INFORMATION

This statement sets out our approach to modern slavery. If you have any questions or require further information regarding emerchantpay's Modern Slavery and Human Trafficking Statement and relevant policies, please contact [compliance@erchantpay.com](mailto:compliance@erchantpay.com).

If you hold any information that could lead to the identification, discovery and recovery of modern slavery or human trafficking victims in the UK, you can contact the Modern Slavery Helpline <https://www.modernslaveryhelpline.org/> by phone on 08000 121700 or by filing an online report at <https://www.modernslaveryhelpline.org/report>.

## REFERENCES

Modern Slavery Act 2015 [\[link\]](#)

Modern Slavery Procurement Guidance, September 2019 [\[link\]](#)

Independent Anti-Slavery Commissioner Strategic Plan 2019-2021, October 2019 [\[link\]](#)

Modern Slavery Reporting During the Coronavirus (COVID-19) Pandemic Guidance, April 2020 [\[link\]](#)

Statutory Guidance. Modern slavery: how to identify and support victims, March 2020. Lastly updated 20 September 2022 [\[link\]](#).

---

Stephen Dickson,  
Director