

TRANSACTION SERVICES GROUP SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (the 'Act') and reassures that Transaction Services Group continues to ensure that modern slavery and human trafficking ('Modern Slavery') is not taking place within its business or supply chain.

In accordance with the Act, large employers have a responsibility to be transparent about their efforts to ensure Modern Slavery is not taking place in their organisation. Transaction Services has a zero tolerance approach to any form of Modern Slavery and we are committed to acting ethically and with integrity in all business dealings. Below are just some of our ways of pursuing that commitment.

Our Group Structure

Transaction Services Group is the parent company of a number of leading direct debit billing solutions providers – Debitsuccess, which operates USA, New Zealand and Australia, FFA Paysmart servicing the Australian market and United Kingdom-based companies, DFC and Harlands Group.

TSG manages the payment processing function for clients in industries including health and fitness facilities, sports clubs, property management companies, maintenance providers, home service providers, and insurance companies.

Our Policy on Modern Slavery

The policies we have in place and our Slavery and Human Trafficking statement, reflect our commitment to:

- Acting ethically and with integrity in all aspects of our business
- Paying a fair wage to individuals for their work
- Enforcing effective systems and controls to ensure Modern Slavery is not taking place in any aspect of our business

This includes:

Fair Pay

Transaction Services Group is committed to ensuring all employees receive fair remuneration for the job they undertake. This includes complying with all applicable UK employment legislation relating to employee terms and conditions, including pay. Additional protections such as fixed hour contracts, holiday pay, sick pay and statutory payments for sickness and maternity are given.

Whistleblowing

The detection and reporting of Modern Slavery is the responsibility of all staff, and any concerns should be raised at the earliest possible opportunity. Any reported breach of this Policy will be investigated and may lead to disciplinary action which may subsequently result in employee dismissal.

Our Supply Chain

We seek to partner with suppliers that adopt the same strict standards that we adhere to. We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and the highest standards of human rights are upheld.

Employee Health and Wellbeing

We are committed to providing a safe and healthy working environment and improving the quality of working lives for all employees. We continue to invest in, and support the health and wellbeing of our staff.

Due Diligence

Our due diligence includes undertaking checks on ID and Right to Work documentation when workers first join us ensuring the correct information has been obtained to permit us to employ the individual.

Our Commitment

Slavery and human trafficking is a criminal activity and a violation of human rights. The exploitation of an individual for commercial gain is a deprivation of human liberty and for this reason unacceptable and a matter of zero tolerance for Transaction Services Group.

Due to the nature of our business, we consider the risk of Modern Slavery existing within our business to be low. Transaction Services Group will regularly evaluate the nature and extent to the risk of modern slavery occurring in its supply chain.

A handwritten signature in black ink, appearing to read 'Roger Bracken', with a long horizontal flourish extending to the right.

Roger Bracken

Director

August 2016