



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR WISE

A. INTRODUCTION

1. Wise plc (**Wise**) is committed to improving its practices to ensure slavery and human trafficking are not taking place in any part of our business. Wise expects the same commitment from our suppliers, contractors and partners.
2. This statement sets out the steps Wise has taken to meet the requirements under the *Modern Slavery Act 2015* (UK) and the *Australian Modern Slavery Act 2018* (Australia) and was approved by the Board of Directors of Wise plc on 3 November 2021.

B. ORGANISATIONAL STRUCTURE

3. Wise is a public company incorporated in the United Kingdom and is the ultimate holding company of the Australian reporting entity, Wise Payments Ltd, the operating entity in Australia. Wise plc has subsidiaries in several countries globally as set out in Appendix 1 (collectively, the "**Wise Group**").
4. The Wise Group's principal activity is to give our customers new ways to manage money internationally, including sending and receiving money abroad.
5. We move more than £5 billion globally every month and work across 17 offices around the world. We currently employ over 2,800 Wisers. None of our work is seasonal, nor do we work in certain sectors that have a higher risk of modern slavery. According to the UK government, these high-risk sectors include construction, food and drink, resource and mining or retail.
6. Wise is the ultimate parent entity of all entities within the Wise Group. The Board of Wise is ultimately responsible for all relevant entities and ensures that all policies and procedures are sufficiently aligned.
7. This statement was prepared following input from and consultation with multiple teams from across Wise Group, including Legal, Third Party Risk Management, Compliance, and Privacy.

C. OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING

8. Wise is committed to ensuring that there is no modern slavery or human trafficking in the Wise Group's supply chains or in any part of our business. Wise acts ethically and with integrity in all our business relationships. Wise promotes and implements effective systems to ensure slavery and human trafficking are not taking place anywhere in our business or supply chains.



D. OUR SUPPLY CHAINS

9. The Wise Group has an extensive supply chain in order to power our business and help our customers.
10. Our suppliers support us in a wide range of areas including recruitment, compliance, marketing, technology, card production, facilities management and banking. We also have relationships with central banks and payment infrastructure services to efficiently run our business and help us to get to Mission Zero.
11. The majority of our suppliers are based in the UK, the EU, and North America.
12. In addition to carrying out initial due diligence of new suppliers, as summarised below, we reassess our critical suppliers on a periodic basis to ensure they continue to be the best fit for use.

E. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

13. As part of our initiative to identify and mitigate risk, the Wise Group has in place processes to identify and assess potential risk areas in Wise and our supply chains and assess the effectiveness of such actions. These include:
 - carrying out due diligence on new material suppliers, including an assessment as to whether the supplier or its supplier chain has a heightened risk of modern slavery. Additionally, during the due diligence process we query whether the Modern Slavery Act applies to such supplier and, if so, request a copy of their Modern Slavery Act statement in order to review the steps they have taken to prevent modern slavery in their business and their supply chains;
 - monitoring potential risk areas in our supply chains by reviewing our relationships with suppliers on a periodic basis proportionate to their level of overall risk to the Wise Group;
 - setting the bar high for the work we do and the way our employees behave. We have a Code of Ethics that sets out our minimum expectations of all Wisers. We show consideration and empathy, live by our values, and in this way we create an open, supportive culture where people can flourish, do their best work and feel supported to escalate concerns they may have about our business or suppliers. We're also clear on how we treat unacceptable behaviour, so we can continue to protect the culture we have built; and
 - protecting whistleblowers through our Whistleblower Policy, which provides a confidential avenue for whistleblowers to submit disclosures anonymously if they wish in order to protect their identity.



14. Wise will not support or deal with any business to whom we know is involved in slavery or human trafficking.

F. SUPPLIER ADHERENCE TO COMPANY VALUES

15. Wise has a zero tolerance policy to slavery and human trafficking.

16. To ensure all those in Wise's supply chain and contractors comply with our values, we have in place a supply chain compliance programme. This includes carrying out the due diligence process referred to above as to the potential level of risk of slavery and human trafficking for new material suppliers.

G. TRAINING

17. To ensure there is understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Wise has training, ethics, disciplinary, and whistleblowing policies and procedures in place.

18. These policies and procedures allow and encourage Wisers to raise any concerns, and for Wise to take appropriate corrective action if necessary, including with respect to slavery or human trafficking.

H. ONGOING ASSESSMENT

19. On an annual basis, our senior management delegate a review of the effectiveness of the processes we have in place within the Wise Group to assess and address modern slavery and human trafficking risks. We also carry out internal audits which cover such compliance processes.

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Kristo Kaarmann

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Name: Kristo Kaarmann

Title: Director

Date: 3 November 2021

Appendix 1: Requirements for Australian Modern Slavery Act 2018

Requirement	Response
Reporting Entity	Wise Payments Ltd (previously TransferWise Ltd)
Reporting Entity's subsidiaries <i>(in alphabetical order)</i> ¹	PT Wise Payments Indonesia Wise Asia-Pacific Pte. Ltd. Wise Australia Pty Ltd Wise Brasil Corretora de Câmbio Ltda Wise Chile SpA Wise China Ltd Wise Europe SA Wise Financial Holdings Wise ILS Ltd. Wise Investments Holdings Wise Nuqud Ltd Wise Pagos México, S.A. de C.V. Wise Pagos México, S.A. de C.V. Wise Payments (Thailand) Limited Wise Payments Canada Inc. Wise Payments Hong Kong Limited Wise Payments India Private Limited Wise Payments Japan K.K. Wise Payments Korea Limited Wise Payments Malaysia Sdn. Bhd. Wise Pilipinas Inc. Wise Switzerland AG Wise Switzerland AG Wise US Inc
Structure, operations and supply chains	See Sections A, B and D.
Risks of modern slavery practices in the operations and supply chains	See Section D.
Actions taken to assess and address such risks	See paragraphs 12 to 17.
Assess the effectiveness of such actions	See paragraphs 13 and 18.
Process of consultation	See paragraphs 6 and 7.
Approval by the principal governing body	Wise plc. See paragraph 2.

¹ Wise plc (the reporting entity for the Modern Slavery Act 2015 UK) controls the additional entities: Wise Payments Ltd, TINV Europe SA, TINV Ltd and TINV Nominees Ltd.