

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION

We, Radius Payment Solutions Limited and its UK group companies (**Radius Group**) are committed to combatting any risk of slavery and human trafficking in all parts of our business and our supply chains. At Radius Group, we are committed to having appropriate policies and procedures in order to identify and ultimately prevent unethical practices in our business and our supply chains.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (**Act**) and constitutes Radius Group's slavery and human trafficking statement for the financial year ended 31 March 2023 (**Year**).

### RADIUS GROUP STRUCTURE

Radius Group is a global business that provides a market leading range of mobility, connectivity and technology related products and services to businesses of all sizes. We currently have more than 2,800 employees operating from 56 offices in 18 countries across five continents.

Further information on Radius Group is available at <http://www.radius.com/>.

### RADIUS GROUP BUSINESS

Radius Group has the following divisions:

- **FUEL:** Radius provides fuel payment cards for business vehicle fleets. Offering its own branded cards through our UK Fuels network, cards from oil companies and white-label solutions, it provides services to over a million card users globally.
- **TELEMATICS:** Radius provides user friendly software that tracks assets worldwide. Products range from simple positional trackers to complex multi camera systems and fully connected devices that pull data from a vehicle's electronic management system.
- **TELECOMS:** Radius provides business mobile phones, broadband and a range of hosted voice over internet protocol (VoIP) communications solutions to companies of all sizes. In addition, our IT security solutions help protect businesses IT infrastructure.
- **INSURANCE:** Radius offers innovative business and vehicle insurance solutions to our fleet customers, including using our telematics solutions to improve driver safety and reduce the risk of accidents, stolen vehicles and false third-party claims.
- **EV:** Radius EV charging supports new and existing customers in the move from internal combustion engine (ICE) vehicles to hybrid and full electric vehicles. EV charging units are provided for both business and home use, with access to charging networks using our REV cards or mobile payment mechanisms.
- **ENERGY:** Radius provides businesses with energy management solutions, identifying the best opportunities for cost saving to overseeing renewals, tendering and procurement.
- **VEHICLE SOLUTIONS:** Radius offers customers access to a wide range of vehicles from all major manufacturers. Providing both rental and leasing solutions that can be tailored to the specific needs of the business, which can be managed by our customers in an easy-to-use platform.

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## RADIUS GROUP SUPPLY CHAINS

Through our long-standing relationships with industry leaders across the world, we have built a wealth of knowledge when it comes to advancements of mobility, connectivity, or technology. We partner with leading energy companies, vehicle manufacturers, insurers and telecoms providers to bring state-of-the-art solutions for our customers. At Radius Group we expect our commercial partners and suppliers to be fully compliant with the Act and that they procure their products and services from compliant and ethical businesses, who understand their obligations under the Act and meet those obligations.

The vast majority of the products and services purchased by Radius Group are sourced from major commercial partners who are compliant with the Act.

We ensure our direct supplier spend is predominantly with suppliers based in countries considered to have low prevalence of slavery, according to the Global Slavery Index - [Maps | Global Slavery Index](#).

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## RADIUS GROUP'S COMMITMENT TO ANTI SLAVERY AND HUMAN TRAFFICKING

At Radius Group we are working to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our business.

The responsibility for ensuring Radius Group has suitable policies in place to identify and prevent slavery and human trafficking ultimately rests with the board of directors of Radius Payment Solutions Limited (**Board**) and the executive leadership team. The responsibility for complying with such policies rests with the executive team of each business unit.

During the Year, we established an ESG committee that works alongside the group's risk and compliance committee. A key responsibility of the committees is the oversight of the group's risks, which includes the risk of modern slavery.

We actively support our employees raising concerns if they believe there is anything unethical or illegal taking place whether in our business or in our supply chains.

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## RADIUS GROUP PROCEDURES

As part of our initiative to identify and mitigate risk, there are programmes in place to ensure that each business division within the Radius Group:

- identifies and assesses potential risk areas in the supply chain;
- mitigates the risks of slavery and human trafficking occurring in the supply chain;
- periodically monitors potential risk areas in the supply chain; and
- protects any whistle blowers.

Internal policies include our Employee Handbook that sets out the core values and principles that underpin how Radius Group operates.

During the Year, we reviewed our Whistleblowing policies and procedures. Our Whistleblowing policy encourages our employees and other business partners to report any wrongdoing identified. The Whistleblowing procedure makes it easy for employees to make disclosure anonymously, without fear of retaliation. The Group General Counsel, Group CFO and Head of Compliance and Risk of Radius Group review

details of all whistleblowing allegations and no whistleblowing allegation relating to modern slavery was raised during the Year.

In addition, our People team carries out pre-employment checks on all directly employed staff prior to issuing a written contract of employment. As the majority of our employees are employed in the UK, we ensure we comply with relevant legal requirements before we employ them.

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## **TRAINING**

During the Year, we updated our Anti-Bribery and Corruption, Anti-Money Laundering and Whistleblowing policies that outline the process of escalating, investigating, and resolving illegal and improper conduct. Employees can raise concerns without fear of repercussions, and anonymously if they choose. Training on these policies is mandatory and provided to all employees. All new employees are made aware of our policies and training is provided as a compulsory part of the induction process.

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## **DUE DILIGENCE AND RISK ASSESSMENT**

Radius Group is committed to conducting business in a lawful and responsible manner, including engaging with suppliers who uphold the same standards.

We regularly review our approach for working with new and existing suppliers to assess and manage the risk of modern slavery. We currently consider publicly available third-party financial related data and are considering the merits of widening this review to ensure compliance with the Act. Any assessment undertaken will focus on the business operations of key suppliers.

We will continue to review and strengthen our approach to human rights issues, including modern slavery, across our business and our supply chains.

This statement covers Radius Payment Solutions Limited and its UK group companies that are required to provide a statement under the Act, and these are:

- Radius Payment Solutions Topco Limited
- Radius Payment Solutions Midco Limited
- Radius Payment Solutions Bidco Limited
- Diesel Card International Limited
- European Diesel Card Limited
- UK Fuels Limited

In compliance with the Act, this statement was approved by the Board and directors of each of the aforementioned companies for the financial year ending 31 March 2023, and signed by:

A handwritten signature in black ink, appearing to read 'William Stanley Holmes', with a long horizontal line extending to the right.

**WILLIAM STANLEY HOLMES**  
Chief Executive Officer  
September 2023

