



**Modern Slavery &
Human Trafficking
Statement
for the
Wise Group**



A. INTRODUCTION

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.

This statement sets out the steps Wise has taken to meet the requirements under the *Modern Slavery Act 2015* (UK) and the *Australia Modern Slavery Act 2018 (Cth)*. This statement was approved by the Board of Directors of Wise plc on 24 September 2025 and it covers both Wise plc and its subsidiary Wise Australia Pty Ltd.

B. ORGANISATIONAL STRUCTURE

Wise is a public company incorporated in the United Kingdom and is the ultimate holding company of the reporting entity, Wise Payments Ltd. Wise Australia Pty Ltd ("**Wise Australia**") is registered in Australia (ACN 616 463 855) and is a wholly-owned subsidiary of Wise. Wise also has subsidiaries in several countries globally, as set out in Appendix 1 (collectively, the "**Wise Group**").

The Wise Group's principal activity is to give our customers new ways to manage money internationally, including sending and receiving money abroad.

We move more than £10 (ten) billion globally every month and work across 30 (thirty) offices around the world. We currently employ over 6000 (six thousand) 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.

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.

This statement was prepared following input from and consultation with multiple teams such as Legal, Third Party Management, Compliance, Privacy and Risk from across Wise Group, including Wise Australia.

C. OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING

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.

Wise supports the implementation of the ten principles of the United Nations Global Compact which relate to human rights, labour, environment and anti-corruption, and we support the international agenda to abolish human trafficking, slavery, forced, compulsory and child labour.

D. OUR SUPPLY CHAINS AND RISK ASSESSMENT

The Wise Group has an extensive supply chain in order to power our business and help our customers. We intend to govern all current and future third party relationships with these slavery issues in mind. We will not knowingly support and/or do business with any suppliers who are involved in slavery.



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 our Mission.

The majority of our suppliers are based in the UK, the EU, and North America.

In addition to carrying out initial due diligence of new suppliers, as summarised below, we reassess our suppliers on a periodic basis to ensure they continue to be the best fit for use.

A dedicated team performs risk assessments on third parties during the onboarding process, frequently reassesses risks and undertakes a review of the Wise Group supply chain. The team also communicates to potential key suppliers that we have a zero tolerance policy with regard to slavery and is clear that Wise intends to conduct its business free from modern slavery.

Throughout this reporting period, we conducted an analysis of our supply chains and operations. As a result of this assessment, local operations managed by our direct employees posed the lowest risk. Our identified high risk¹ area involves offshore labour and services arranged by third-party providers, where enhanced due diligence is required under international modern slavery frameworks. These third parties represent a small portion of our total supplier base providing services to the Wise Group including Wise Australia (AU) and Wise Payments Limited (UK). These suppliers operate in jurisdictions where we apply additional oversight procedures in accordance with global best practice guidance. Importantly, all these suppliers have published modern slavery policies, which help mitigate the associated risks.

E. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

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 third parties, including material, which also incorporates an assessment as to whether the supplier or its supply 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 supporting evidence 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 Conduct](#) that sets out our minimum expectations of all Wisers. We follow internal rules set by our policies and guidelines, and act in line with laws and regulations applicable to us as individuals, as well as to the organisation as a whole. We treat each other fairly, as equals and with respect. We're also clear on how we treat unacceptable behaviour, so we can continue to protect the culture we have built; and

¹ Risk (High, Medium and Low) is categorized according to Wise's Country Risk Index and Global Slavery Index.



- 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.

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

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

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 to assess the potential level of risk of slavery and human trafficking for new third parties, including material.

G. TRAINING AND POLICIES

To ensure there is understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Wise makes reference to this within company training. This training is mandatory and must be completed annually by all Wisers.

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.

When a concern involves one of our suppliers, Wise is committed to working with them to address any identified issues. However, if a supplier fails to take appropriate corrective action, we will begin a process of responsible disengagement.

H. ONGOING ASSESSMENT

On an annual basis, our senior management delegates 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.

I. MEASURING EFFECTIVENESS

For a purpose of the Modern Slavery Act 2015 (UK) and the Australian *Modern Slavery Act 2018* (Cth) and ensure that slavery and human trafficking is not taking place in Wise business or supply chains, we measure effectiveness in this by following:

- annual reviews of the Modern Slavery Statement; effective deployment of internal training and whistleblowing policies and procedures, ethics, disciplinary implementation;
- standard and enhanced due diligence procedures undertaken on Wise third parties;
- performing of risk assessment of every new outsourcing arrangements, which includes assessments of modern slavery risk;
- management and ongoing monitoring of Wise supply chains;
- controls implementation through maintenance of Wise's internal third party



management system.

Signed by:
Kristo Käärmann
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Name: Kristo Käärmann

Title: Director



APPENDIX 1: REPORTING ENTITY SUBSIDIARIES LIST

Requirement	Response
Reporting Entities	Wise Payments Limited Wise Australia Pty Ltd
Reporting Entity's subsidiaries (in alphabetical order) ¹	Wise plc PT Wise Payments Indonesia TINV Ltd TINV Europe AS TINV Nominees Ltd Wise Payments Limited, Sucursal en España Vaho Forex Private Limited Wise Asia-Pacific Pte. Ltd. Wise Brasil Corretora de Câmbio Ltda Wise Brasil Instituição de Pagamento LTDA Wise Chile SpA Wise China Ltd Wise Europe SA Wise Financial Services Hong Kong Limited Wise Europe Eesti filiaal Wise Financial Holdings Ltd Wise Fintech Network LLC Wise ILS Ltd. Wise Investments Holdings Ltd Wise Assets Nominees Ltd Wise Assets UK Ltd Wise Assets Europe AS Wise Singapore Assets Pte.Ltd Wise Australia Investments Pty Ltd Wise Malaysia Assets Sdn. Bhd. Wise NewCo Holdings Limited Wise NewCo Limited Wise Payments Limited New Zealand Limited Wise Payments Limited - Netherlands Wise Nuqud Ltd Wise Pagos Mexico, S.A. de C.V. Wise Payments Holdings (Thailand) Limited 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 Limited Magyarországi Fióktelepe Wise Payments Limited Eesti Filiaal Wise Payments Malaysia Sdn. Bhd. Wise Payments South Africa (Pty) Ltd Wise Pilipinas Inc. Wise Switzerland AG Wise US Inc Wise US Holdings Inc.



	279 NewCo Inc Wise US Assets 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 Section D (fourth and fifth paragraphs), E, F and C (first paragraph).
Assess the effectiveness of such actions	See Section E (first paragraph) and I.
Process of consultation	See Section B.
Approval by the principal governing body	See Section A (second paragraph).

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