

## UK Anti-Slavery & Human Trafficking Statement 2025

### Introduction

This statement sets out the steps taken by Bottomline to understand all potential modern slavery risks related to our business and to put in place steps which are aimed at ensuring that there is no slavery or human trafficking in our own business as well as within our supply chains. This statement relates to actions and activities during the period 1 April 2024 to 31 March 2025.

### Organisational Structure & Supply Chains

Bottomline powers mission critical business transactions. We help our customers optimise financially oriented operations and build deeper customer and partner relationships by providing a trusted and easy to use set of cloud-based digital banking, fraud prevention, payment, financial document, insurance and healthcare solutions.

We innovate and deliver game-changing technology designed to delight customers and help them grow their business. Based on our deep market knowledge combined with development and business expertise, we constantly set, anticipate, and respond to changing industry and organisational demands.

Today over 10,000 organisations depend on Bottomline solutions to help power their success, including 60 of the Fortune 100 and 89 of the FTSE (Financial Times Stock Exchange) 100. Our corporate vision is to help our customers innovate, win and grow by powering their mission critical business transactions.

#### *Countries of operation and supply*

Bottomline is headquartered in Portsmouth, New Hampshire and we have offices in the United States, Europe, and Asia-Pacific.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We fully support the aims of the Modern Slavery Act 2015 and are committed to complying with applicable anti-slavery and human trafficking laws. Our Anti-Slavery & Human Trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our organisation or supply chains.

We have a zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values. We include appropriate clauses in our supply contracts.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers as reflected in our Whistleblower Policy.

We continue to review our policies, training, processes, operations and supplier relationships to comply with the Modern Slavery Act 2015 and will implement any appropriate or necessary actions to ensure ongoing compliance with the Modern Slavery Act 2015.

### Relevant Policies

Bottomline operates the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Anti-Slavery and Human Trafficking Policy:** We have an established policy to ensure our continued compliance with the Modern Slavery Act 2015. The policy gives workers, contractors and other business partner's guidance on slavery and human trafficking and the measures taken by Bottomline to tackle slavery and human trafficking in its business and its supply chains.
- **Whistleblower Policy:** We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Bottomline's Whistleblower Policy is designed to provide all employees with the ability to report any violations of Bottomline's Code of Ethics without fear of retaliation. Additionally, the Whistleblower Policy has been specifically designed to ensure that any employee who wishes to raise a concern on an anonymous basis can do so.
- **Employee Code of Ethics:** Bottomline's Code of Ethics is the code by which directors, officers, employees and contractors of Bottomline are expected to conduct themselves at all times. All Bottomline business is to be conducted with the highest standards of integrity and in compliance with all applicable laws and regulations. This code applies to Bottomline and all of its subsidiaries worldwide.
- **Recruitment/Agency T&Cs:** Bottomline uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All new agencies are required to sign an agreement to conform to the standards of Bottomline.

## Due diligence

Bottomline continues to conduct appropriate due diligence when considering taking on new suppliers and the review of its existing suppliers. Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour as reflected in our Code of Ethics.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all relevant employees regarding:

- how to identify the signs of slavery and human trafficking; and
- what initial steps should be taken if slavery or human trafficking is suspected.

## Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement.

This statement has been approved by a registered director, who will review and update it annually.

Director signature: 

Director name: Julian Chapman

Date: 1<sup>st</sup> April 2025