



Modern Slavery Act 2015

Company Statement for the Financial Year ending December 31st 2016

Optal Financial Limited (Optal Financial) is an Authorised Electronic Money Institution based in London, regulated by the UK Financial Conduct Authority, and is a wholly owned subsidiary of Optal Limited, also incorporated in the UK.

Optal Financial provides virtual card payment solutions for the business-to-business sector.

As a UK financial services provider, Optal Financial has a relatively simple supply chain compared with organisations in other industry sectors. The majority of its suppliers are based in the UK, Europe and Australia.

Slavery and human trafficking are serious criminal activities and Optal Financial will not knowingly support or do business with any organisation involved in such activities.

This statement is underpinned by the Optal Group's corporate policies and associated procedures, including the following:

- Risk Management Policy
- Financial Crime Policy
- AML Policy
- Whistle Blowing Policy
- Human Resources Policy

Optal Financial conducts risk-based Due Diligence on its key suppliers and on its business customers both prior to entering into a relationship with them and on an ongoing basis.

Furthermore, Optal Financial monitors its business customers' transactions to detect unusual supplier payments which may indicate criminal activity, including people trafficking.

Optal Financial risk assessments include multiple factors, including:

- Country Risk
- Industry Sector Risk
- Transaction Risk

In 2017 Optal Financial will provide training to relevant staff to protect it from being directly or indirectly associated with slavery and human trafficking.

This statement has been approved by the Board of Directors of Optal Financial Limited and will be reviewed and updated annually.

Signed:

Name:

Andrew Downes

Title:

General Manager

Company:

Optal Financial Limited

Dated:

Wednesday, 21st June 2017

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