



Modern Slavery Act 2015

Company Statement for the Financial Year ending 31 December 2017

Optal Financial Limited (“**Optal Financial**”) is an Authorised Electronic Money Institution incorporated in England and Wales with its registered office at 27-28 Eastcastle Street, London W1W 8DH. Optal Financial is regulated by the UK Financial Conduct Authority and is a wholly owned subsidiary of Optal Limited, also incorporated in England and Wales.

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 and are primarily comprised of other financial services and technical services providers.

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

Optal Financial continually monitors and reviews its corporate policies and associated procedures to ensure that both its existing and new policies and procedures meet its obligations under the Modern Slavery Act 2015 and as set out in this statement. Optal Financial requires all employees to review and acknowledge the terms of the above policies on an annual basis.

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
- business partnership risk

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

Over the course of the financial year ending 31 December 2017, Optal Financial has undertaken the following steps:

- prepared and published its first Slavery and Human Trafficking Statement;
- carried out a risk assessment on its existing supply chains across its business to identify those suppliers it considered to be most at risk of having slavery or human trafficking in their business or supply chains
- for suppliers that we identified as being at risk of having slavery or human trafficking in their business or supply chains, we obtained and reviewed their slavery and human trafficking statements where such statements were published
- prepared standard clauses to be incorporated into new and existing contracts with suppliers to provide appropriate protections against slavery and human trafficking
- included the new standard clauses in contracts with suppliers where feasible

No known or suspected issues of slavery and human trafficking were identified in Optal Financial's supply chain in the last financial year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2017 and has been approved by the Board of Directors of Optal Financial. This statement will be reviewed and updated annually.

Signed:

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Lincoln Roberts
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Name: **Lincoln Roberts**
Title: **Director**
Company: **Optal Financial Limited**
Day **07 September 2018**

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