



Modern Slavery Act Statement for the Financial Year ending 31 December 2018

Business structure and supply chains

Optal Limited (**Optal**) is a company incorporated in England & Wales under company number 05531282.

There are currently two wholly owned regulated entities within the Optal Group directly subject to the Modern Slavery Act 2015 (the **Act**):

- 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 provides virtual card payment solutions for the business-to-business sector.
- Invapay Payment Solutions Limited (**Invapay**) is a company incorporated in England and Wales under company number 06402512. Invapay is regulated by the UK Financial Conduct Authority and provides payment solutions for the business-to-business sector.

As a financial services provider, Optal and its subsidiaries have relatively simple supply chains compared with organisations in other industry sectors. The majority of our suppliers are based in the UK, Europe and Australia and primarily comprise of other financial services and technical services providers.

Governance

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

Optimisewithus

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Registered office: 27-28 Eastcastle Street,
London W1W 8DH, United Kingdom

Optal Financial Limited is a private limited company registered in England and Wales (company number: 08364883). Authorised by the Financial Conduct Authority under the Electronic Money Regulations 2011 (reference number: 900112) for the issuing of electronic money.

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 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 Act and as set out in this statement. Optal requires all employees to review and acknowledge the terms of the above policies on an annual basis.

Optal conducts risk-based due diligence and assessments of its key suppliers and business customers both prior to entering into a relationship with them and on an ongoing basis to identify those suppliers it considers to be most at risk of having slavery or human trafficking in their business or supply chains.

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

Our risk assessment includes multiple factors, including:

- country risk
- industry sector risk
- transaction risk
- business partnership risk

For suppliers that we identify 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. Standard clauses are incorporated into new and existing contracts with suppliers, where feasible, to provide appropriate protections against slavery and human trafficking

Effectiveness

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

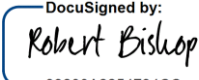
Looking Ahead

We will review our existing risk assessment in 2019 to identify any emerging risks and the need for introduction of relevant performance indicators and tailored role specific training. Optal will then provide

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

Approval

This statement is made pursuant to section 54(1) of the Act for the financial year ending 31 December 2018 and has been approved by the Board of Directors of Optal. This statement will be reviewed and updated annually.

Signed: 
Name: **Robert Bishop**
Title: **Director**
Company: **Optal Limited, Optal Financial Limited and Invapay Payment Solutions Limited**
Date: 10 April 2019

