



## **Transaction Network Services, Inc. Forced Labour & Child Labour Report**

Pursuant to the Canada Fighting Against Forced Labour & Child Labour in Supply Chains Act (the “Act”)

### **OUR COMPANY.**

Transaction Network Services, Inc. (“TNS”) is a data communications and managed service provider to the payments telecommunications and financial services industries. TNS’ global organizations, no matter where we do business, are committed to conducting all business lawfully—with stewardship and integrity. This commitment extends throughout our business and supply chain and includes, among other things, an expectation that our suppliers do not use forced labour, in any of its forms, including forced labour and child labour, to produce the services they provide to TNS. Our supply chains who demonstrate our shared commitment are a key part of our continued success. TNS’ compliance and ethics expectations are set out in our Code of Conduct (<https://tnsi.com/legal/>). Due to the elevated level of sophistication that is required to be able to provide the services that TNS offers, there is a low probability that any form of forced labour, including child labour would be utilized in our industry.

### **DUE DILIGENCE.**

At TNS, we continue to improve our due diligence measures to ensure we are engaging partners who are committed to doing business the right way and have not participated in unlawful conduct, including forced & child labour.

### **Our Values & the Koch Stewardship Framework.**

As part of the Koch Group of companies, our management framework, Principle Based Management™, is based on proven principles of human progress and a deep appreciation for the dignity of every individual. Our focus on individuals and bottom-up solutions is evident in our Stewardship Framework (<https://www.kochind.com/stewardship>) and drives our approach to Environmental, Social, and Corporate Governance (ESG). Stewardship encompasses the responsible management of our actions and the resources entrusted to our care in a manner that respects the rights of others. By “rights,” we mean everyone’s right to their own life and property, and equal treatment under the law.

Our commitment to and expectations for ensuring that our business and supply chain is maintained in a lawful and socially responsible way includes, among others, that neither forced nor child labour is taking place in any component of our business. These expectations are set out in our values, requiring all employees at every level to ensure that our actions are conducted with integrity and honesty in the course of all of our business dealings. We endeavor to be honest, fair, and trustworthy in all our activities and are expected to:

- Comply with the applicable laws and regulations governing our business conduct worldwide;
- Avoid all conflicts of interest between work and person affairs;
- Foster an atmosphere in which fair employment practices extend to every member of the diverse TNS community; and
- Deal fairly with our customers, maintain confidentiality, and adhere to Company policies.

The expectation to adhere to our values not only applies internally but extends to our external supply chains as well.

### **Transaction Network Services, Inc.**

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## **Code of Conduct—Our Policies Regarding Forced & Child Labour.**

With specific regard to the need to combat forced and child labour in all forms, our Code of Conduct states:

### **Fair Employment Practices**

TNS is committed to fair employment practices that use merit, qualifications and other job-related criteria as the basis for employment related decisions. TNS is also committed to following the applicable labor and employment laws wherever it operates and to providing a work environment for its employees free of illegal discrimination and harassment.

To live up to this commitment, TNS must recruit, hire, train, compensate, promote and provide other conditions of employment without regard to a person's race, color, religion, national origin, citizenship status, gender, marital status, sexual orientation, age, disability, veteran status or other characteristic protected by law. TNS must not tolerate intimidating, abusive or offensive conduct or sexual harassment in our workplace. TNS shares a responsibility to promote a respectful work environment; TNS has a duty to report any discrimination or harassment that TNS may see in the workplace to your supervisor, a member of management, a compliance and ethics resource, a member of TNS' legal department or a member of TNS' human resources team.

In addition, TNS is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. TNS will not tolerate any such activities within our own operations or within our supply chain. As part of our initiative to identify and mitigate risk and ensure compliance with applicable laws, including without limitation the UK Modern Slavery Act 2015, TNS will continue to adhere to applicable employment and labor laws everywhere we operate.

Our Code of Conduct drives compliance with the above requirements the responsibility of each employee.

### **SELF-ASSESSMENT.**

As of this reporting year, because TNS is in a low-risk industry and unaware of any forced labour within our business or supply chains, no immediate action for detailed self-assessments has been taken.

### **Accountability Standards.**

TNS' Code of Conduct identifies numerous avenues, including a Compliance & Ethics Helpline, that provide employees, customers, suppliers, and members of the public with a reporting mechanism, including anonymity (where allowed by law) to report concerns about potential breaches of our Code of Conduct, other TNS policies, or the law. Such concerns are objectively investigated under the guidance and direction of our compliance or legal departments. We prohibit retaliation against anyone who raises a concern in good faith.

### **REMEDATION**

As of this reporting year, no immediate action for remediation of forced & child labour has occurred. TNS is in a low-risk industry and unaware of any situations that would require remediation.

**Income Remediation.** Because TNS is unaware and there is no proof of any outside effects our forced & child labour policies may have had, no immediate action for this specific remediation is required within our business or supply chains—as of this reporting year.

### **EMPLOYEE TRAINING & GUIDANCE**

Although TNS does not have a comprehensive, mandatory training program focusing on forced and child labour, employees receive training on the employee Code of Conduct which addresses and supports a supply chain free of any type of forced or child labour, as well as avenues available for reporting concerns. The training is periodically provided through a varied methodology.

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## **OUR SUPPLY CHAINS & ADHERENCE TO OUR VALUES**

We expect all those in our supply chain to comply with our values, therefore non-compliance with applicable laws, regulations, and our standards regarding forced & child labour will result in corrective action up to and including termination, depending on the circumstances. Forced labour in any form has an exceptionally low probability of being utilized in TNS' supply chain, thus creating a minimal risk profile of forced labour or child labour.

### **Potential Risk**

TNS assesses and selects its suppliers with care. We maintain the expectations outlined in our Code of Conduct for lawful and respectful business practices and extend this expectation to our suppliers, who are assessed under a risk-based review. If non-conformance with our standards and guidelines were to arise, depending on the circumstances, we would either require that supplier establish corrective action and report on the implementation of such plans, or we would terminate the relationship. Review of such non-conformance must be viewed on a case-by-case analysis given the surrounding information.

### **PUBLICATION**

A copy of this statement may be viewed at TNS' website ( <https://tnsi.com/legal/>).

### **ATTESTATION & APPROVAL.**

In accordance with the requirements of the Act, & in particular, §11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.

A handwritten signature in black ink, reading 'James T. McLaughlin', is written over a horizontal line.

James T. McLaughlin  
EVP, General Counsel & Secretary

October 3, 2024

“I have the authority to bind Transaction Network Services, Inc.”