APPROVED POSITION STATEMENTS

CAB Payments Holdings plc

Position Statements

INTRODUCTION

Executive Summary

CAB Payments Holdings plc (the "Group") is a specialist financial services group comprising a number of regulated and non-regulated entities, which includes Crown Agents Bank Limited, a UK-regulated bank, CAB Europe BV, a regulated Dutch subsidiary, CAB Global Markets Limited, and CAB US Inc. Together, these entities provide foreign exchange, cross-border payments and banking services that connect emerging, frontier and hard-to-reach markets to the global financial system. The Group is committed to delivering sustainable growth through robust governance, effective risk management and responsible business practices. These Responsible Business Position Statements set out the Group's overarching position and governance approach across nine priority areas.

Each statement reflects Board-approved principles, established governance arrangements, and existing control frameworks, rather than standalone ESG programmes. They are designed to support consistent decision-making across the Group and to be credible for regulators, investors, clients, auditors, and other stakeholders.

This document supports investor and client engagement, regulatory submissions, and internal alignment, helping the Group manage ESG-related risks with discipline while supporting long-term sustainable value creation in the markets we serve.

Note: These statements represent the Group's position as at the date indicated. They are reviewed on an annual basis or following material changes in regulatory requirements or business practice.

NAVIGATION

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POSITION STATEMENT

Financial Inclusion

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1 Financial Inclusion

Our Position

The Group supports activities that advance social and financial inclusion in underserved and frontier markets, where such activity is consistent with our purpose, strategy, and regulatory obligations.

Statement

All inclusion-related activity is subject to the same financial crime, conduct, and ESG safeguards as other activities, with enhanced scrutiny applied where vulnerable populations, weak governance, or elevated financial crime and other risks may arise.

Our financial initiatives include:

1. Global Currency Capabilities
The Group has currency coverage of 124 currencies, with 440 partners in its network. This breadth of coverage ensures that even the most underserved and frontier markets can access the global financial system through a single regulated banking partner.

2. Trade Finance
In 2025, the Group provided £623 million in trade finance loans to local markets, directly helping to address the global trade finance gap that prevents millions from accessing global markets.

3. Sustainability Categorisation in Transaction Analysis (2025)
CAB Payments developed and launched a new Sustainability Categorisation within its transaction screening framework, formally integrated on 1 July 2025. This allows the Group to categorise flagged payments and foreign exchange transactions associated with sustainability-related risks, embedding responsible business directly into financial flows.

For more examples and case studies of our Financial Inclusion services and products, please refer to our Responsible Business Reports:

- Sustainability Report 2024
- Responsible Business Report 2025

These initiatives are subject to enhanced due diligence and governance oversight where appropriate and may require senior approval. Outcomes are monitored to inform future inclusion related activity.

We are committed to ensuring our inclusion initiatives do not undermine customer protections, facilitate financial crime, or expose vulnerable populations to harm. Inclusion activity is supported only where risks are clearly understood, appropriately assessed, and capable of being effectively mitigated over time.

Delivering Prosperity in the Markets We Serve

With decades of experience and deep expertise in complex cross-border payments, we help organisations and institutions move money with confidence. Through a trusted network built over time, we provide access to diverse currencies and connect clients to markets and opportunities across the Global South that others cannot easily reach. Our long-term, partnership-driven approach is founded on deep understanding, reliability, and a commitment to delivering even in challenging conditions. Underpinning everything we do is a focus on responsible business, transparency, and sustainability, supporting a positive impact on the communities where we operate.

> " Financial inclusion underpins delivering prosperity in the markets we serve "

Key Financial Inclusion Metrics

- Social Impact Metric 1: £bn in development aid flows
- Social Impact Metric 2: £bn in emerging market volumes
- Social Impact Metric 3: £bn in fintech and corporate flow (Remittance Flows)
- Social Impact Metric 4: £mn in Trade Finance Loans Provided

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POSITION STATEMENT

Responsible Products

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2 Responsible Products

Our Position

The Group is committed to the responsible design, distribution and ongoing management of its products and services, ensuring fair customer outcomes, transparency, and the effective management of risk and social impact.

Statement

This statement sets clear expectations for the design, marketing and ongoing management of products and services, with a focus on fair customer outcomes, transparency and risk management. Product risks and characteristics are reviewed and disclosed through established governance processes, through senior management oversight and, where appropriate, Board level oversight.

The Group incorporates impact and risk assessments into product development and significant change processes, supported by reviews and ongoing monitoring of product performance, social impact and conduct.

The Group seeks to continuously improve customer outcomes and satisfaction through monitoring performance, analysing feedback and implementing enhancements where required. Customer satisfaction and service quality are actively monitored, including through formal complaints mechanisms, client feedback and Net Promoter Score metrics.

The Group reports annually on the social impact of its services, including relevant risk considerations, through public disclosures such as its Annual Report and Accounts and Responsible Business Reports.

Employees receive regular training on developing sustainability strategies, sustainable innovation, customer fairness, and regulatory expectations, including FCA and PRA requirements, to ensure responsible marketing, distribution and ongoing management of products and services.

New Product or Significant Change Process (NPSC)

The Group maintains a formal NPSC process to provide the framework to assess the risks relating to new products and significant change and the provision of tools to manage and / or mitigate those risks.

The NPSC exists to ensure that there is a consistent Group-wide approach to manage the risks involved in new product development, significant variation to existing products or significant organisational change. This includes consideration of the risks against business strategy and risk appetite.

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POSITION STATEMENT

Financial Crime Compliance

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3 Financial Crime Compliance

Our Position

The Group is committed to preventing financial crime and does not knowingly facilitate any form of financial misconduct, including money laundering, bribery and corruption, terrorist financing, fraud, or sanctions breaches.

This commitment is supported through robust controls, due diligence, monitoring and governance processes designed to manage financial crime risks effectively.

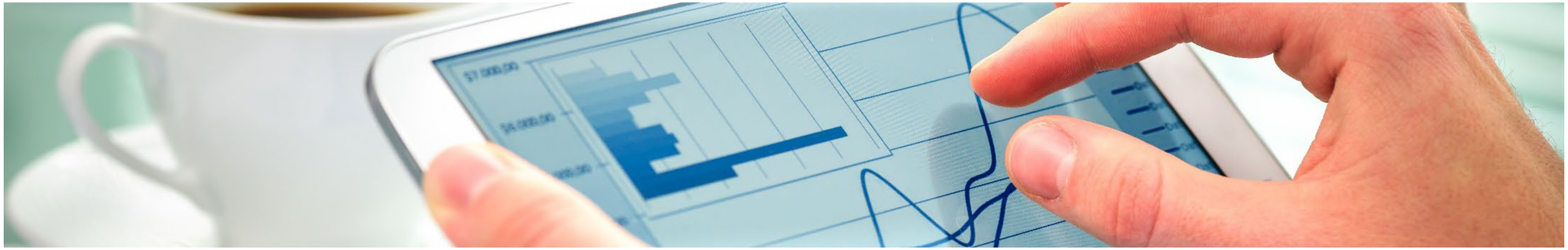
Statement

The framework is supported by annual training for employees, a defined risk-based framework and controls, and independent assurance, with emerging risks and regulatory developments monitored and reflected, as necessary.

Where risks cannot be effectively managed, or where activities are inconsistent with regulatory obligations or the Group's standards, the Group may restrict activity or exit relationships, in line with appropriate governance processes and applicable legal and operational considerations.

For the purposes of this Statement, bribery and corruption refer to the offering, giving, requesting or acceptance of any financial or non-financial advantage intended to influence, or perceived as influencing, the impartial performance of duties or the outcome of a business decision.

> "Strong Financial Crime Compliance is Vital to Our Purpose of Delivering Prosperity in The Markets We Serve"



Key Commitments

The Group maintains a formal Financial Crime Prevention Policy that sets clear expectations for acceptable behaviour and establishes minimum standards for the prevention, detection, and escalation of financial crime risks across the Group. The policy applies to all employees and relevant third parties and is supported by training and defined escalation routes, reinforcing the Group's commitment to preventing financial crime and breaches of relevant laws or standards.

The policy defines and addresses key financial crime risks, including conflicts of interest, bribery and corruption, sanctions, fraud, tax evasion, and market abuse. Conflicts of interest are managed through identification, governance, escalation, and oversight arrangements designed to minimise the risk of improper influence or personal gain, while bribery and corruption are clearly defined and prohibited for employees and third parties acting on behalf of the Group.

The Group prohibits the offering, giving, requesting or acceptance of bribes in any form, including improper inducements, corporate hospitality intended to influence business decisions, and employment or procurement practices linked to business advantage. Facilitation payments are also prohibited, except where personal safety is at risk, with clear escalation requirements and reporting obligations in place.

Oversight of financial crime risk is embedded within the Group's governance framework, with regulatory accountability held by the Money Laundering Reporting Officer and second line financial crime compliance, supported by dedicated governance forums and escalation to executive and Board level management. Financial crime risk is owned by first line of defence that generate or support the business. The framework is adopted across the Group and facilitates ongoing monitoring, reporting and enforcement of financial crime standards and supports a culture of ethical conduct and regulatory compliance across the organisation.

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POSITION STATEMENT

Modern Slavery & Human Rights

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4 Modern Slavery & Human Rights

Our Position

The Group is committed to respecting human rights across its operations, supply chain and client relationships. The Group is committed to preventing human rights abuses and seeks to avoid causing, contributing to, or being directly linked to adverse human rights impacts.

Statement

Our commitment reflects our purpose as an international financial group operating in frontier and emerging markets, where heightened human rights risks may arise due to weaker regulatory environments, conflict exposure, and/or labour protections.
We align our approach with the UN Guiding Principles on Business and Human Rights and relevant International Labour Organisation conventions.

Human rights considerations are integrated into the Group's due diligence and risk management processes across client, transaction and third-party activities.
Where actual or potential adverse impacts are identified, we apply appropriate escalation and mitigation measures, which may include enhanced due diligence and engagement actions where required.

> " Respect for human rights is fundamental to all business activity and must underpin decisions across markets, clients and supply chains "

Modern Slavery

We publish an annual Group Modern Slavery Statement and maintain supporting policies covering non-discrimination and fair employment, health and safety, freedom of association, supplier due diligence, and sustainable procurement. Confidential whistleblowing reporting channels are available to employees, including independent external anonymous online reporting.

Client and Supplier Human Rights Due Diligence

We screen and monitor clients for human rights risks, with enhanced controls in higher-risk contexts, and engage partners where this strengthens outcomes. Where activity conflicts with our standards, we reassess and act, including restricting or ending the relationship.

Within both client and supplier due diligence, our onboarding policies and procedures consider key areas including maximum working hours, child labour, non-discrimination, disciplinary practices, minimum living wages, health and safety, forced labour and wider human rights conditions.

Oversight

Oversight for human rights risk sits with senior management and the Board through established governance and risk committees. We expect suppliers, partners, and clients to uphold equivalent standards and may disengage where breaches are identified and not remediated.

Further detail on our Responsible Business governance is available in our latest Annual Responsible Business Report.
Further detail on Group governance is available in our latest Annual Report and Accounts.

This commitment is supported by training for employees, onboarding due diligence processes for clients and vendors, and mechanisms to identify, escalate and remediate adverse human rights impacts where they arise.

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P O S I T I O N   S T A T E M E N T

Whistleblowing, Social Responsibility & DEI

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5 Whistleblowing, Social Responsibility & DEI

Whistleblowing Policy

The Group maintains a formal whistleblowing framework that is actively communicated to employees and supported by training. The Group provides independent and confidential reporting channels, including an externally managed hotline and secure online reporting platform, with the option to report anonymously and with protections against retaliation. Oversight is provided by an independent Whistleblowers' Champion, with reporting to the Board on the operation and effectiveness of the framework. Our annual Responsible Business Report publicly discloses whistleblowing activity, including the number of incidents in the previous calendar year. The Whistleblowing Policy also sets out options to submit disclosures to the FCA and PRA directly.

Social Responsibility

Our Group Social Responsibility Policy supports community engagement and matched giving.

Diversity, Equality & Inclusion

The Group promotes an inclusive workplace, supported by employee affinity and networking groups that provide structured channels for employee voice and engagement. The Group publicly monitors and reports diversity data across its Board, Executive Committee and workforce, with senior management accountability for diversity and inclusion outcomes embedded within governance arrangements. As a signatory to the Women in Finance Charter and a member of the UN Global Compact Network UK, the Group supports diversity including formal mentoring programmes, targeted development initiatives, and recruitment practices designed to attract diverse talent, supported by ongoing training and guidance to promote fair, inclusive and equitable practices across the organisation.

All employees have access to relevant programmes and training. Our publicly reported diversity targets and metrics encompass all employees.

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POSITION STATEMENT

Climate Change, Environment, Nature & Biodiversity

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6 Climate Change, Environment, Nature & Biodiversity

Climate Change and Environmental Statement:

The Group treats climate change as a potential material risk driver and strategic consideration. We recognise both physical and transition risks as relevant to our business model, operating footprint, and client base, noting that some impacts will be second order in nature rather than direct.

The Group is committed to protecting the environment and minimising the environmental impact of its operations and activities. This includes net zero commitments and the responsible management of environmental risks across the Group.

The Group is committed to the efficient use of natural resources, including energy, water and materials, and seeks to monitor and reduce our consumption, where possible, through operational controls, supplier engagement and continuous improvement initiatives.

The Group promotes environmental awareness across the organisation through employee training and internal communications, supporting employees to understand environmental risks and contribute to the Group's environmental objectives.

Climate-related Risk

Climate-related risk considerations are incorporated within the Group's enterprise-wide risk management framework and are considered through risk analysis, governance, strategy, and decision-making processes, including scenario-based risk assessment and proportionate climate disclosures aligned to applicable regulatory expectations.

The Group keeps its climate risk assessments under review, taking account of evolving climate science, regulatory expectations and market developments to ensure continued proportionality.

Direct Environmental Impact:

While the Group's direct operational footprint is limited, climate considerations are reflected in relevant discussions and decisions, with proportionate engagement with clients and partners where appropriate. The Group monitors and publicly reports its environmental and social performance annually. These metrics are reported annually in our Annual Report and Accounts, and Annual Responsible Business Report.

We aim to achieve net zero across our own operations by 2050. Residual Scope 1 and 2 emissions may be addressed through carbon credits or removals, where appropriate, and climate considerations are incorporated into supplier onboarding through the Supplier Code of Conduct. Our net zero target is underpinned by clear commitments, including strengthened environmental awareness across the organisation and externally, double materiality assessments with holistic stakeholder engagement, and appropriate assurance.

We have aligned our double materiality assessment with the European Sustainability Reporting Standards (ESRS), which sit under the Corporate Sustainability Reporting Directive (CSRD). This process ensured we engaged with key stakeholders to inform our understanding of the Group's environmental impacts, risks and priorities, and to support the development of our environmental approach over time.

Our trade finance lending book is limited and short term (typically less than a year). Lending is currently to local banks in our key markets, rather than to end borrowers that may be subject to higher direct climate risks.

Environmental Management System:

The Group maintains an environmental management framework to manage its environmental impacts, supported by appropriate governance controls, performance monitoring, governance oversight and periodic review.

The Group is dedicated to implementing effective environmental management practices in our operations. The Group ensures compliance with all legal requirements, while also maintaining consistency with our voluntary disclosures.

The Group has a Board-approved Net Zero Roadmap, which has been aligned to Science Based Targets initiative (SBTi). The Group recognises its responsibility in mitigating climate impact and supports the goals of the Paris Agreement.

CAB Payments Holdings PLC is a certified B Corp. In addition, the Group continues to build on our voluntary and unsolicited ratings, which currently include EcoVadis, Sustainalytics, UN Communication on Progress (CoP), and S&P's Corporate Sustainability Assessment (CSA).

The Group has identified office operations, supply chain, and business travel as the three focus areas of environmental impact. We have also implemented sustainability within our Sustainable Procurement Policy and Supplier Code of Conduct. We maintain an environmental management approach supported by governance, monitoring and public reporting.

The Group's approach to Environmental Management establishes clear responsibilities for all employees, supporting responsible management of environmental impacts within our wholesale banking operations.

Nature and Biodiversity

The Group recognises nature and biodiversity as important to sustainable development and long-term economic resilience. Although our direct footprint is limited, we acknowledge that our financing activities and partnerships may influence outcomes in nature-sensitive sectors and jurisdictions.

Nature-related risks are considered through the Group Environmental Policy and integrated into the Group's risk management framework, where material.

This is managed through existing risk governance and due diligence processes. ESG risks are assessed through client onboarding, due diligence, and escalation under the Enterprise Risk Management Framework and Group Environmental Policy.

Oversight

Oversight of climate risk sits with senior management and the Board through existing risk governance. Climate considerations are integrated into enterprise risk management, and disclosures are reviewed and updated annually. Climate-related risks have been considered against our Group principal risks. These risks are actively evaluated and monitored on an ongoing basis.

The Group continues to strengthen internal capability, reporting quality, and climate-related risk assessment over time, recognising that climate risk profiles may evolve as the business, markets, regulation, and transition pathways develop.

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POSITION STATEMENT

Data Protection & Cybersecurity

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7 Data Protection and Cybersecurity

Our Position

The Group manages cybersecurity risk as a material operational risk. The Group recognises that its operations depend on the secure and resilient operation of technology, information systems and external service providers. Cyber risk is therefore governed at Group level, with oversight through established executive and Board governance, and ownership assigned to senior management functions.

Statement

The Group is committed to maintaining a secure and resilient technology and information security environment. We seek to minimise cybersecurity risks through strong controls, ongoing monitoring, and continuous improvement.

The Group has no appetite for unmanaged cyber risks or material control weaknesses. We maintain a low tolerance for cybersecurity incidents that could result in service disruption, loss of data, financial impact or regulatory non-compliance. Cyber risk is managed through proportionate controls, informed by risk-based assessment and aligned to regulatory expectations for financial institutions.

Cyber risk is monitored on an ongoing basis through risk management, assurance and escalation processes designed to identify changes in threat exposure or control effectiveness. Where risks increase or controls weaken, issues are escalated through formal governance channels and mitigating actions are prioritised. The Group conducts periodic reviews to assess cyber resilience and support continuous improvement.

All employees and relevant contractors are required to complete cybersecurity and information security training at least annually, with additional training provided where role-based risk requires it. Completion is monitored in line with the Group’s compliance requirements.

> " Secure and resilient systems underpin trust, operational integrity, and regulatory compliance across our business"

Cyber Risk Monitoring

Cyber risk is monitored on an ongoing basis through established risk management, assurance and escalation processes, aimed at identifying changes in threat exposure and control effectiveness. Where risk levels increase or control deficiencies are identified, matters are escalated through formal governance channels and appropriate mitigating actions are prioritised and tracked. The Group undertakes periodic reviews to assess cyber resilience and support continuous improvement.

Industry Alignment

The Group's approach to cybersecurity and information security is underpinned by alignment with recognised industry standards. The Group maintains an Information Security Management System. The Group is certified to ISO/IEC 27001 and holds Cyber Essentials certification, both of which are publicly disclosed on our website. These provide independent assurance over elements of the Group's governance, risk management and control environment, and support confidence in its approach to cyber and information security risk management.

Disaster Recovery

The Group maintains a documented disaster recovery and technology resilience approach, including defined recovery objectives for critical services and systems. Disaster recovery plans are reviewed and tested on a planned basis, with outcomes reported through governance and improvement actions tracked to completion.

The Group maintains disaster recovery and cybersecurity incident management arrangements which are reviewed and tested on a planned basis, with outcomes reported through governance.
Personal data incidents are subject to formal escalation and oversight in line with internal standards and applicable regulatory requirements.

Oversight

The Group operates a formal data protection and information management framework, supported by defined incident management and breach notification arrangements. Privacy and data risks are overseen through established governance structures, with clear accountability across senior management roles including the Data Protection Officer (DPO) and Chief Information Security Officer (CISO). The CISO and DPO provide formal cybersecurity reporting to the Board on a regular basis. Reporting covers key risk indicators, material incidents and near misses, control effectiveness, significant vulnerabilities, third party technology risks, and remediation progress.

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POSITION STATEMENT

Occupational Health and Safety

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8 Occupational Health and Safety

Our Position

The Group seeks to comply with all applicable health and safety laws and regulations in the jurisdictions in which it operates, including the Health and Safety at Work Act 1974 and associated regulatory requirements. The Group's approach is aligned with recognised good practice in occupational health and safety management.

Statement

The Group is committed to mitigating avoidable harm to employees, contractors, or visitors. We aim to maintain safe and healthy working environments across all locations and working arrangements.

Health and safety risks are managed through a structured approach supported by governance, risk assessment and continuous improvement.

The Group establishes and monitors health and safety arrangements to support continuous improvement in safety outcomes. This includes incident trends, training completion, and risk remediation. Within our Annual Responsible Business Report, we publicly state the number of Health & Safety incidents we have had throughout the previous year.

This commitment applies to employees, contractors and third parties working on the Group's behalf, across both physical and mental health, and in office-based, remote and field environments.

The Health and Safety Policy is approved through the Group's governance framework, including senior management oversight, with ultimate accountability residing with senior management.

> "We have maintained and continue to provide preventative controls, training, and wellbeing initiatives."

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POSITION STATEMENT

Responsible Selling & Marketing

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9 Responsible Selling & Marketing

Our Position

The Group is committed to conducting its marketing and communications in a responsible and sustainable manner that protects customers' best interests and promotes informed decision-making. Our approach to marketing is guided by clear principles of integrity, transparency and fairness, ensuring that promotional activities align with our public commitments and regulatory obligations.

Statement

This statement sets out a high-level commitment to provide accurate, complete and understandable information across all marketing and communications. Marketing materials are designed to present products and services clearly and fairly, avoiding misleading claims, exaggeration or omissions that could distort understanding. Information is communicated in plain language and structured to support informed assessment of product features and implications.

The Group recognises the importance of transparency regarding potential downsides of financial products and services. Where relevant, marketing communications include appropriate disclosure of risks or potential negative consequences, ensuring that customers are informed not only of benefits but also of material considerations that may affect outcomes. This supports balanced decision-making and helps prevent inappropriate or unsuitable product use.

The Group is committed to responsible audience targeting. Marketing activities are directed towards appropriate audiences, taking into account the nature, complexity and intended use of each product or service. Products are not promoted to customers for whom they may be inappropriate or unsuitable, and care is taken to avoid targeting vulnerable groups or audiences without the appropriate level of understanding or need.

This statement and its principles are positioned at the Group level. It provides a clear public statement of the Group's commitments and expectations for ethical, transparent and responsible marketing practices, aligned with existing governance, compliance and conduct frameworks.

Through this approach, the Group seeks to ensure that its marketing practices support sustainable choices, fair customer outcomes and long-term trust, while meeting regulatory expectations and stakeholder standards for responsible business conduct across all Group subsidiaries and their respective local regulations.

The Group is committed to ensuring marketing communications are accessible and understandable to intended audiences. This includes the use of clear language, appropriate formats and consideration of accessibility needs, to support inclusive and informed customer engagement.

Oversight

Oversight of responsible marketing is maintained through the Group's marketing and compliance governance structure, with appropriate review, approval and escalation arrangements.

APPENDIX

Governance and Oversight

Document Information

Area	Related Policies (Group)	Review Frequency	Last Reviewed
Financial Inclusion	Social Responsibility Policy, Financial Crime Prevention Policy, Customer Due Diligence Policy, Responsible Product Framework	Annual	August 2026
Responsible Products	New Product or Significant Change Policy (NPSC), Conduct Risk Framework, Product Governance Framework	Annual	August 2026
Responsible Marketing	Conduct Risk Framework, Financial Promotions Policy	Annual	August 2026
Modern Slavery & Human Rights	Modern Slavery Statement, Whistleblowing Policy, Social Responsibility Policy, Diversity & Inclusion Policy, Sustainable Procurement Policy, Supplier Code of Conduct	Annual	August 2026
Whistleblowing, Social Responsibility & DEI	Whistleblowing Policy, Financial Crime Prevention Policy, Social Responsibility Policy, Diversity & Inclusion Policy, Employee Handbook	Annual	August 2026
Data Protection & Cybersecurity	Information Security Policy, Data Protection Policy, Cybersecurity Framework, Incident Management Policy, Disaster Recovery Policy	Annual	August 2026
Financial Crime & Compliance	Financial Crime Prevention Policy, Anti-Bribery & Corruption Policy, Sanctions Policy, Fraud Policy	Annual	August 2026
Climate Change, Environment, Nature & Biodiversity	Group Environmental Policy, Social Responsibility Policy, Group Sustainable Procurement Policy	Annual	August 2026
Occupational Health and Safety	Group Occupational Health & Safety Policy, Employee Handbook	Annual	August 2026

APPENDIX

Notes & Version History

Document Information

Document Title	CAB Payments Holdings plc Position Statements
Classification	Public
Version	1.0
Reviewed/Amended By	Responsible Business, Operations and Technology, Risk and Compliance, Legal, Human Resources, Marketing
Approved By	Executive Risk Committee, Board Risk Committee, the Board
Effective Date	August 2026