

# Supplier Code of Conduct

2021 Version 1.1 Global



## Vision

Reward Gateway is a values-led, Mission-driven business.

We hold ourselves accountable to the standards outlined by our Values and People, and strive to make real progress in '**making the world a better place to work**' for all of those that come into contact with our business.

That sentiment extends to our supply chain, and the many businesses, organisations and people who we partner with, that help us in achieving our Mission. We value fairness, honesty, and responsibility and expect our partners to conduct themselves and their organisations in a manner which aligns with those attributes.

## Purpose

In a nutshell, our Supplier Code of Conduct will:

- 1. Set minimum standards that a supplier must adhere to.
- 2. Help protect our business and respect supply chain workers.
- 3. Ensure we're partnering with suppliers who share our values and beliefs.

Our Supplier Code of Conduct is a tool to assist us in partnering with organisations who follow best practices that are consistent with our Policies and Values. It is also a tool to help us in identifying potential areas of concern, so that we may work with others to find real, sustainable solutions.

This document is also a guide for potential 'partners' (contractors, sub-contractors, suppliers and others) of Reward Gateway, so that they can understand what is important to us, and how they can conduct themselves in a way that meets our standards. We expect our partners to understand that the way they conduct themselves and their organisations also reflects on us.

## **Expected Standards and Practices**

Reward Gateway supplier partners must comply fully with legal requirements relevant to the conduct of their operations. Specifically, we expect our partners to operate work environments where the following standards and practices are implemented:

## People

### Equity and freedom from discrimination

We believe in the value of diversity, which both reflects and flows from inclusion and creates equity. Inclusion and diversity promote innovation, growth and improved business results, but most importantly, they are right and they are fundamental to what we do and how we do it at Reward Gateway.

You can find out more at <u>rgdiversity.com</u>.

At Reward Gateway, we do not tolerate violence and/or discrimiation in any way, shape or form. We expect all of our partners to take the same stance in creating work environments which value and respect their people.

#### What are we asking of you?

- Partners must treat their people with fairness, respect and dignity.
- We expect at the minimum for partners to be compliant with local laws and legislation which promote equality and address discrimination in the workplace.
- Decisions in relation to recruitment, progression, compensation, benefits, work conditions and dismissal must be made solely on a person's ability to perform their role and not in any way connected with or motivated by their protected characteristics such as (but not limited to) sex, gender, race, ethnicity, age, sexuality or disability.

### Modern slavery and human rights

Reward Gateway takes a zero tolerance stance to modern slavery and human trafficking.

We expect all those in our supply chain and contractors to adopt the same approach and at the very minimum to be compliant with the Modern Slavery Act 2015 (UK) and the Commonwealth Modern Slavery Act 2018 in Australia.

You can find out more in our Modern Slavery and Human Trafficking Statement <u>here</u>.

#### What are we asking of you?

- Partners must not use forced labour in any sense of the meaning. That includes (but is not limited to); prison labour, indentured labour, bonded labour and child labour.
- We expect supplier partners to take and document progressive actions to reduce the risks of modern slavery and/or human trafficking within their own supply chains.

### Fair Treatment

At Reward Gateway we believe in treating our People and everyone that we interact with with fairness, respect and consistency. That includes (but is not limited to):

- Providing fair and appropriate compensation and benefits.
- Creating a safe and flexible working environment.
- Encouraging our employees to 'Speak Up' regarding how we can be better.

Partners are expected to also respect the rights and dignity of their people and demonstrate their commitment to fairness at work.

#### What are we asking of you?

- Partners must adhere to or exceed the minimum wage required by law, or the prevailing industry wage (whichever is higher) in their operating countries.
- Where compensation does not meet workers' basic needs, partners must take appropriate actions to progressively raise employee compensation and living standards through improved wage systems, benefits, welfare programmes and other services.
- We expect our partners to respect the right of their people to join associations of their choosing for the purposes of collective bargaining on issues regarding working conditions and fair treatment without fear of harassment, penalty or reprisal.
- Partners must provide employees with written contracts outlining standard and overtime hours; wages; benefits and any deductions.
- We expect our partners to have robust processes for checking identification, age and right to work/visa requirements.

- No employee should pay for their job placement, therefore we expect our partners to pay any incurred recruitment related costs.
- Partners must provide pay-slips showing how wages are calculated and be clear about any deductions that they are making.

## **Information Security & Data Protection**

As a technology business, the Security and Privacy of our information is one of our most important tasks.

We invest heavily in people, processes and technology, and have been through some of the toughest tests and accreditations by government and corporate clients.

You can find out more about our approach to Information Security and many of the measures we take <u>here</u>.

We expect our partners to also take this seriously and to handle any data that we share with them in a responsible and legally compliant manner.

#### What are we asking of you?

Because we take Information Security so seriously, we have a dedicated <u>Security</u> <u>Pack</u> which outlines all of our policies, procedures, audit reports, and a security focused 'Supplier Relationship Policy'.

We expect all supplier partners to adhere to the requirements outlined in our policies, and work with us whenwe require information as evidence of compliance. We will review all potential and existing suppliers on their maturity and approach to Information Security and Data Protection.

We prefer to partner with organisations who see these topics as core parts of their success strategy, rather than those who may see them as a compliance chore.

In the interest of transparency we have made the Security Pack downloadable, and welcome feedback and questions regarding our approach.

### **Environmental Sustainability**

As a technology business our direct environmental impact is relatively low, but that doesn't mean we can be complacent.

We know that taking responsibility for our own environmental footprint is the right thing to do. It's also important to our People and it's increasingly important to our Customers which means that reducing our environmental impact will help us in achieving our Mission.

It is through the environmental impact of those in our supply chain that we can have the biggest impact, which means working with suppliers, partners and advisors to measure and reduce our collective footprint.

You can learn more about our approach to environmental management in our <u>Social</u> <u>Value Strategy.</u>

#### What are we asking of you?

- Supplier partners must adhere to and comply with local environmental legislation in every region that they operate.
- We expect partners to take progressive steps to improve the environmental impact of their operations, which includes working with organisations in their own supply chain.
- Supplier partners may be required to share data with regards to their own carbon emissions and environmental targets for the purposes of enabling us to understand more about, and address, our Scope 3 emissions.

## Owning it

As one of Reward Gateways core values 'owning it' empowers our people to take accountability for their actions and behaviours and own their responsibilities in and outside of work.

We expect our suppliers to create their own plans of action for continuous improvements, and to have their own mechanisms in place to ensure that progress. We're confident that the organisations we chose to partner with will share our goals and vision and therefore reserve the right to request evidence and conduct spot visits to gain a better understanding of those we work with.

We ask that any of our partners contact us within 5 working days should there be any breaches of the expectations set in this document, and/or if they are investigating allegations made against them.

Whilst our approach is not punitive, we require that our supplier partners own their responsibilities. Should a partner contact us and seek to remedy any problems that have been identified, we will engage in dialogue and provide space and support where possible. However, if there is no willingness to make improvements then we may have no other option other than to end our working relationship.