# SUPPLIER CODE OF CONDUCT

### Introduction

Our aim is to deliver excellent services to our customers, and to adhere to the highest standards of ethical and professional behavior. Our suppliers play a vital role in helping us to achieve our aims and deliver on our commitments as a listed company.

The objective of this Supplier Code of Conduct is to ensure that we have a mutual understanding of expectations, values and fundamental principles which we expect our suppliers to adhere to.

#### **Supplier's Commitment**

We expect our suppliers to:

- Comply with the requirements of this code; and
- Have appropriate systems in place to ensure continuous compliance and to demonstrate compliance.

In carrying out its agreement(s) with us, supplier shall, in addition to complying with the standards set out in this code, comply with all applicable UK laws and regulations (and if applicable, the laws and regulations of any other jurisdiction where it or its affiliates operate) including but not limited to the laws and regulations related to issues addressed in this code. If there is a conflict between the standards in this code, applicable laws and regulations and terms of an agreement with PCI Pal, the more stringent standard shall prevail.

### **Workforce Issues**

- Slavery, human trafficking and child labour: we will and expect our suppliers to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force(including the Modern Slavery Act 2015 in the UK) in any part of the supply chain. This includes not supporting or engaging or requiring any forced labour, the use of child labour, indentured labour or prison labour.
- 2. **Human rights**: we will and expect our suppliers to comply with internationally recognised human rights in force from time to time in any part of the supply chain.
- 3. **Equal opportunities**: we are an equal opportunities employer and seek to work with like-minded suppliers. We expect that our suppliers' employment practices do not discriminate in hiring, compensation, training, advancement or promotion, termination, requirement or any other employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union or political affiliation or any other characteristic other than a worker's ability to perform the job subject to any accommodations required or permitted by law.
- 4. **Working environment**: we will and expect our suppliers to provide a safe, healthy and sanitary working environment and comply with applicable health and safety laws. This includes implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards, accidents and injuries.
- 5. **Remuneration**: we will and expect our suppliers to compensate all workers with wages, including any overtime premium, and benefits that at a minimum meet the higher of:
  - a. minimum wage and benefits established by law;
  - b. collective agreements;

- c. industry standards; and
- d. an amount sufficient to cover basic living requirements.

# **Environmental responsibility**

We shall and expect that our suppliers shall ensure:

- 1. its operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) climate change, waste disposal, emissions, discharges and the handling of hazardous and toxic materials;
- 2. the goods it manufactures (including the inputs and components that it incorporates into its goods) comply with all applicable environmental laws and treaties; and
- 3. it will only use packaging materials that comply with all applicable environmental laws and treaties.

# **Bribery and Corruption**

We will and expect our suppliers to comply with all applicable laws, statues and regulations related to the prevention of bribery and corruption, including, in the UK, the Bribery Act 2010, Criminal Finances Act 2017 and Economic Crime and Corporate Transparency Act 2023. We expect suppliers to have robust processes to ensure that subcontractors in their supply chain also comply with these laws.

# Compliance

Suppliers shall monitor compliance with this code and shall report any breaches (actual or suspected) to us as soon as reasonably practicable. On our reasonable request and no more than once per calendar year, suppliers shall provide reasonable evidence of their compliance with this code.

Suppliers shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this code or questionable behaviour, or who has sought advice regarding this code.