



# Supplier Code of Conduct

29 June 2021

## Purpose

This Supplier Code of Conduct (Code) applies to any entity that supplies goods and / or services to Afterpay or its related entities anywhere in the world. It is Afterpay's main objective to collaborate with its suppliers to meet Afterpay's corporate responsibilities in areas such as labour and human rights, workplace health and safety, environmental management, ethical business practices and governance, cyber security and privacy, and diversity.

Afterpay requires its suppliers to read, understand and ensure their business, employment practices and supply chain comply with this Code. Where this Code refers to workers, this includes employees, contractors, agency, migrant, student and temporary staff of the supplier and of its related entities.

## Afterpay's Commitment

As a global business, Afterpay recognises the responsibility it has in protecting the most vulnerable members of the communities Afterpay works in and serves.

Afterpay is committed to respecting human rights and ensuring that its people and partners comply with all laws that seek to preserve those rights in each of the countries in which it operates. Afterpay does this by:

- Respecting internationally recognised human rights principles as set out in the Universal Declaration of Human Rights and the 10 UN Global Compact Principles, and ensuring that these principles are understood, respected and upheld across our organisation, primarily through training and education and across the Afterpay supply chain.
- Treating its employees with respect, and providing a safe, fair, and non-discriminatory work environment that is free from harassment, bullying or victimisation/retaliation and which respects the right of freedom of association.
- Promoting diversity and inclusion within our workplace, respecting the diversity of our employees and setting measurable objectives to support our progress in this area.



- Closely monitoring and complying with all applicable laws and regulations in communities and jurisdictions in which Afterpay operates (and where differences exist between Afterpay's own standards and local customs, rules or regulations, applying the higher standard).
- Protecting the data of our Customers, Merchants, Partners and Employees.
- Not tolerating or supporting the use of child labour, forced, bonded or compulsory labour and any other form of modern slavery.
- Considering the risk of its direct or indirect involvement in negative impacts on human rights through both Afterpay's own activities and business relationships and, where risk is identified, taking appropriate action to mitigate such risks.
- Engaging meaningfully with its stakeholders with respect to their human rights in any interaction.

Afterpay expects its suppliers to influence their own supply chain to adopt a safe, fair and ethical approach to their operations and to demonstrate adherence with this Code. Afterpay's suppliers are expected to monitor their compliance, notify Afterpay of any breaches as soon as possible and take reasonable steps to address, resolve and prevent further breaches of this Code.

## Code of Conduct for Suppliers

### **Compliance with Relevant Laws**

Suppliers must comply with the law in the countries in which they operate and any other law applicable to the goods / and or services provided to Afterpay.

### **Labour and Human Rights**

It is expected that all Afterpay suppliers respect and support the protection of human rights of all workers, as well as all individuals and communities affected by their activities and ensure a safe and healthy working environment at all times.

### **Non-Discrimination, Equal Opportunity and diversity**

Afterpay does not tolerate any type of discrimination and expects that its suppliers will not directly or indirectly engage in or support discrimination in hiring or in any other employment practices, based on grounds including but not limited to, gender, age, ethnicity, religion, race, cultural background, disability, sexual orientation, gender identity, pregnancy (or potential pregnancy), family or caring responsibilities, marital or relationship status, union or industrial activity, political beliefs, criminal record, or personal association with a person who possesses or is thought to possess any of these attributes.

Afterpay values diversity and inclusion and believes a focus on diversity should encompass all our differences both visible and non visible.

Afterpay encourages suppliers to promote equal opportunity and diversity in their own organisations, workplaces and supply chains, including by:

- Having in place equal employment opportunity, anti-discrimination/harassment and diversity policies.
- Ensuring recruitment processes and employment decisions, relating to areas such as promotion and remuneration, are fair and support diversity objectives.
- Developing procurement processes aimed at addressing systemic inequality for marginalised and underrepresented groups.



### **Bullying and Harassment Practices**

Suppliers must not use violence or threats of violence, or any other form of physical coercion or harassment. Physical punishment, mental or verbal abuse, sexual harassment or abuse, and inhumane treatment are not tolerated.

### **Modern Slavery - Child and Underage Labour**

The minimum age for employment must be in line with International Labour Organisation (ILO) standards. This Code allows for workplace apprenticeship programs or light work as defined by the ILO. Children under the age of 18 (in countries where it is legal for them to work) must not be employed for any hazardous work and employment should not interfere with their education.

### **Modern Slavery - Forced and Compulsory Labour**

Suppliers are not permitted to engage in any form of forced, bonded, compulsory or slave labour, or human trafficking. Suppliers must not require workers to relinquish any government issued identification, including their passport or work permit or other personal document as a condition of gaining employment.

Workers should not be required to pay employers or agents any fee for securing employment.

### **Working Hours, Wages and Benefits**

Suppliers should ensure workers do not exceed maximum work hours as set by applicable laws. Suppliers should also ensure that workers are remunerated in accordance with applicable local laws regarding minimum wages, overtime, wage deductions. Suppliers are expected to provide their employees with fair and reasonable compensation and benefits.

### **Work Health and Safety**

Afterpay requires its suppliers to comply with relevant workplace health and safety laws and ensure their workers and suppliers comply with health and safety policies, standards and procedures that apply to them. Additionally, suppliers are required to provide safe environments for workers, visitors and third parties, by managing risks and providing appropriate training for their workers and contractors in safe work practices.

Suppliers must ensure emergency equipment is in place to effectively respond to and manage incidents and emergencies.

### **Environmental Management**

Afterpay expects that suppliers meet applicable local government regulations and environmentally responsible business practices and endeavour to comply with international standards in environmental protection. Suppliers are required to obtain, maintain and comply with all relevant environmental permits and registrations applicable to them when supplying goods and or services to Afterpay. Suppliers are expected to minimise the adverse environmental effects of their operations, products and services by working to reduce the use of raw materials and resources in their operations and seek ways to maximise the efficient use of energy, water, resources and raw materials and minimise pollution, waste and greenhouse gas emissions.

### **Honesty, Integrity & Conflicts of Interest**

At Afterpay, we act with honesty and integrity and do not make or receive any improper payment and / or benefits.

Suppliers should act ethically and be honest and transparent in all their dealings and comply with applicable anti-bribery and anti-corruption laws (including but not limited to the Australian Criminal Code, US Foreign Corrupt Practices Act 1977, UK Bribery Act 2010). Suppliers must ensure zero tolerance and implement processes and controls to mitigate corrupt activities such as extortion, bribery, facilitating improper payments or benefits to its customers,



suppliers and workers, including to any third party or government and must have adequate policies and procedures in place to monitor compliance with such laws.

Suppliers should avoid and disclose to Afterpay as soon as possible any actual, potential or perceived conflicts of interest with Afterpay employees.

### **Responsible Sourcing**

If applicable, suppliers are expected to conduct appropriate due diligence to reasonably ensure that the raw materials contained in the products they produce do not directly or indirectly assist organisations and individuals connected with illegal activities, human rights abuses or terrorism.

### **Sanctions & Trade Controls**

Suppliers must not engage in trade activities or include in their supply chain any goods and / or services sourced from sanctioned persons, countries or organisations, including all applicable laws and regulations relating to sanctions, import, export and trade controls, including laws enacted by the UN, Australia, New Zealand the US, the UK, and the EU.

### **Privacy & Security**

Suppliers must respect the privacy of individuals whose personal data they collect and process on our behalf. Suppliers must ensure they meet applicable global privacy and security legislation and relevant standards, and capture appropriate privacy and security obligations under their contractual agreement(s) with Afterpay. Suppliers are expected to complete due diligence of sub-processors they engage and require them to comply with similar privacy and security obligations that Afterpay has agreed with them.

Suppliers are expected to maintain adequate privacy and security policies and processes, training, monitor compliance, and implement adequate technical and organisational privacy and security measures and controls, including to avoid or otherwise appropriately respond to security incidents or personal data breaches if they arise. Suppliers must have procedures in place to notify Afterpay immediately if they have suffered a security incident or a data breach involving Afterpay data.

### **Operational Management**

Suppliers should develop, maintain and implement policies to support the implementation of this Code or an equivalent standard appropriate for their organisation, and maintain appropriate systems to manage and document adherence with this Code.

Suppliers are expected to communicate how they adhere to the principles of this Code to workers, their own suppliers, and members of the communities in which they operate.

## Raising a Concern

A safe and supportive environment in which all team members are respected and supported is critical to our long-term success. It is important that individuals are encouraged to “speak up” when they see inappropriate behaviour or illegal activity. We encourage and support all current and former employees, directors, contractors, consultants and third-party suppliers to report suspected or actual misconduct, as well as unlawful activity.

Anyone who reports any matter has the option of identifying themselves or remaining anonymous.



Afterpay expects suppliers to also have similar processes and policies for their workers and any of their own suppliers to raise a matter.

All of Afterpay's current and former employees, directors, contractors, consultants and suppliers have access to a confidential whistleblower process outlined below:

Website: <https://www.yourcall.com.au/report>  
Log in using the unique identifier code AFTERPAY  
You can upload supporting documentation and/or material securely.

Email: [whistleblower@afterpay.com](mailto:whistleblower@afterpay.com)

Telephone: 1300 790 228 Australia  
0800 123 508 New Zealand  
0-800-046-5662 United Kingdom  
1 (800) 897-2761 United States  
(800) 897-2761 Canada  
400 120 8519 China  
+34 518 88 0572 Spain  
0805 98 54 85 France  
800-492-2390 Singapore  
+62-21-27899741 Indonesia  
Between 9am and 12am on business days, AEST



## Document Control

Version	Author	Approver	Reason for issue	Date
1.0	Head of Legal - Group Matters	Chief Enterprise Risk Officer	First Issue	16 December 2020
2.0	Global Head of Compliance	Chief Enterprise Risk Officer	Annual review	29 June 2021