



Supplier Code of Conduct

Introduction

The Supplier Code of Conduct sets out our expectations of suppliers, generally in terms of business practices, and specifically with regard to:

- ethical supply and people practices including diversity and inclusion,
- prevention of financial crime,
- environmental responsibility,
- data protection and information security,
- health and safety.

Cash Access UK Limited expect our suppliers to meet the requirements set out in legislation, regulation, and good industry practice and to ensure that their extended supply chain do the same. Working together across our supply chains, we will encourage and enable sustainability and long-term positive impacts within the communities we serve.

GENERAL REQUIREMENTS

1 General requirements for all suppliers

1.1 Cash Access UK Limited expects its suppliers to behave ethically, apply high standards of corporate conduct and to fully comply with all relevant law.

1.2 Cash Access UK Limited has a zero-tolerance approach to improper business conduct of any sort and our suppliers may be required to confirm that their business practices meet the standards set out in this Supplier Code of Conduct.

2 General Requirements for prospective suppliers

2.1 Prospective suppliers shall keep all pre-contract data, negotiations and tender progress strictly confidential and shall, at our request, enter into a more detailed non-disclosure agreement.

2.2 In every instance where a preferred Supplier is identified, Cash Access UK Limited shall undertake a suitable and sufficient risk assessment so that it takes full account for the risks and benefits of the proposed appointment. Additional due diligence may be required and suppliers must co-operate fully and promptly with due diligence enquiries. Suppliers may be required, at the discretion of and where deemed appropriate by Cash Access UK Limited, to propose exit plans, business continuity plans, disaster recovery plans and/or other similar documents when entering into contract or where tendering, to appropriately plan for and mitigate against potential future issues.

2.3 All activity between Cash Access UK Limited and potential suppliers will be conducted with integrity. Contracts will be awarded based on merit. Hospitality or other inducements which seek to encourage or reward a decision must not be offered to our employees or any other individuals associated with Cash Access UK Limited. The acceptance of gifts, hospitality or inducements of any nature during a competitive tender by our employees is strictly prohibited.

2.4 Documented risk assessments shall be retained for at least seven years from the end of the relationship with the particular Supplier.

3 General requirements for current suppliers

3.1 Where Cash Access UK Limited enters into a contract with a supplier, the relationship will be governed by agreed terms and conditions. In addition, the supplier shall comply with the requirements of this Supplier Code of Conduct only to the extent that such requirements are:

- (a) not already expressly agreed in the contract between us; and
- (b) relevant to the supplier and/or the services being provided, given all the circumstances.

3.2 As part of supplier management, Cash Access UK Limited carries out due diligence on each supplier in order to ensure compliance with relevant law and to ensure the supplier continues to meet our business needs. Suppliers must cooperate fully and promptly with due diligence enquiries.

3.3 Where applicable and in accordance with agreed contractual conditions, suppliers may be required to propose exit plans, business continuity plans, disaster recovery plans and/or other similar documents, to appropriately plan for and mitigate against potential future issues. These plans will be reviewed at an agreed frequency to ensure they remain relevant and appropriate.

3.4 Cash Access UK Limited may require suppliers to share their internal policies and procedures to enable a review of their appropriateness to ensure that changes in regulations, technology, and industry best practice are captured, as well as changes within the organisation. Regular reviews will ensure that sound governance is encouraged and instilled which will demonstrate continuous improvement.

4 Ethical Supply – people practices

4.1 Suppliers shall respect the human rights of their employees, other personnel and local communities and shall comply with all relevant law pertaining to human rights.

4.2 Cash Access UK is committed to ensuring modern slavery does not exist in its business and supply chain. Details can be found on our website. Suppliers shall also take appropriate steps to identify and eradicate modern slavery, in all its forms, including slavery, servitude, forced and compulsory labour and human trafficking, whether of adults or children, all forms of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

4.3 We are also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same commitment from all our suppliers and we expect that our suppliers will hold their own suppliers to the same high standards. As part of our due diligence Cash Access UK Limited may ask to see relevant policies and statements as part of our procurements and on-going supplier management processes.

4.4 Suppliers shall implement appropriate due diligence practices and provide training to identify the risk of and/or actual instances of modern slavery.

4.5 Suppliers shall document all the steps taken to tackle modern slavery and shall, on request, provide a report to Cash Access UK Limited setting out all policies and procedures implemented, including due diligence undertaken, risk areas identified, how risks have been mitigated, training provided and consequences for third parties of noncompliance.

4.6 All suppliers shall ensure that, within their own organisations and throughout the supply chain:

(a) child labour shall not be used and relevant law pertaining to minimum working age legislation shall be strictly complied with,

(b) forced labour, in any form, shall not be used and supplier workers shall not be required to lodge papers or deposits on starting work; and

(c) physical abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation or inhumane practice shall not take place, whether as part of a disciplinary process or otherwise, and shall be prohibited.

4.7 Cash Access UK Limited is committed to a policy of equality opportunity in our employment practices in order to ensure that no job applicant, employee or any other individual is discriminated against and less fairly treated because of gender or marital status, race (including colour, castes, nationality or ethnic origin), disability, religion, age, sexual orientation, union membership, political affiliation, being a member of a protected class under international human rights law or any other conditions not justified in relevant law or relevant to the performance of the job.

4.8 Cash Access UK Limited is committed to creating an inclusive workplace where individuals are able to be themselves, irrespective of their gender, race (including colour, castes, nationality or ethnic origin), disability, religion, age and sexual orientation. As such, we expect our suppliers to be committed to the same principles and require them to have policies in place to promote diversity within their own organisations and supply chain. We expect suppliers to agree to provide evidence of their commitment upon reasonable request.

4.9 All terms and conditions of employment must be made clear to the workforce in a manner which is easily understood by that workforce. The supplier shall ensure that:

(a) employee wages comply with relevant law pertaining to the minimum wage and that minimum wage or the prevailing industry wage (whichever is higher) shall be paid to workers as a minimum;

(b) each employee shall be provided with all benefits under relevant law and no non-statutory deductions shall be made from wages;

(c) relevant law pertaining to working time and the maximum hours of work permitted to be undertaken by any employee in any period of time, must be complied with, and any overtime shall be on a voluntary basis and at manageable levels; and

(d) all employees, whether local or migrant, have the right and ability to leave employment when they choose.

4.10 Suppliers must provide workers with clear, fair and uniformly applied disciplinary practices and grievance procedures.

4.11 Training, including that required under relevant law and industry specific training (whether mandatory or best practice) should be provided to workers and regular refresher training provided on a timely basis.

4.12 Suppliers shall provide sufficient evidence, promptly upon request from Cash Access UK Limited, that they have implemented appropriate procedures to manage all labour related issues within their supply chain to ensure that they comply with relevant law and this Code of Conduct.

4.13 Suppliers shall demonstrate, through supply chain transparency, that people are dealt with ethically and lawfully and that goods are traded fairly and meet the environmental aims detailed in this Code of Conduct.

5 Prevention of Financial Crime and Sanctions

5.1 In this section, Financial Crime shall include bribery, corruption, money laundering, terrorist financing, tax evasion and the failure to prevent the criminal facilitation of tax evasion. Cash Access UK Limited is committed to ensuring that its services are not used to facilitate money laundering, terrorist financing, sanctions breaches or other financial crime.

5.2 Suppliers shall comply with all relevant law pertaining to Financial Crime and shall not do or omit to do anything which would cause Cash Access UK Limited to be in breach of such relevant law.

5.3 With regard to anti-bribery and anti-corruption measures, suppliers shall put in place an appropriate policy and procedures which prohibit workers from:

- (a) the offering, giving, soliciting or receiving of a bribe at any time (including the making of facilitation payments or the bribery of public officials) whether for the benefit of the supplier or for the benefit of the worker, a member of the worker's family, friends, associates or acquaintances;
- (b) the use of a gift or hospitality to induce a fraud or other wrongdoing to secure a personal or business benefit;
- (c) the use of sponsorship or advertising agreements to exercise undue influence; or
- (d) unapproved or unauthorised charitable donations or political donations of any kind.

5.4 With regard to anti-money laundering and counter terrorist financing measures, suppliers shall put in place an appropriate policy and procedures which:

- (a) verify the legitimate origin of goods and services within their supply chain; and
- (b) verify the identity and the legitimate nature of the businesses with which the supplier contracts.

5.5 With regard to tax evasion, suppliers shall have adopted a tax strategy that demonstrates a willingness to pay the right amount of tax, in the right place at the right time.

5.6 With regard to measures to prevent the criminal facilitation of tax evasion, suppliers shall put in place an appropriate policy and procedures which:

- (a) regularly assess the opportunity, motive and means within their business for the criminal facilitation of tax evasion;
- (b) implement reasonable preventative measures by developing procedures that are appropriate to the mitigate the identified risks; and

(c) effectively communicate the expectations of management, being that compliance with such policy and procedures is mandatory and that the business takes a zero-tolerance approach to any breach.

5.7 As part of the prevention, identification and detection of Financial Crime issues, suppliers shall implement appropriate oversight, regular risk assessments, appropriate due diligence and procedural audits.

5.8 Suppliers shall encourage workers to promptly report to an appropriate senior manager if they know of or suspect any business activity that is in contravention of the supplier's Financial Crime procedures and shall implement disciplinary action for any worker failing to comply with such procedures.

5.9 The supplier shall keep sufficiently detailed records relating to the identification and prevention of Financial Crime and shall promptly notify Cash Access UK Limited (via the Commercial Director mark.essex@cashaccess.co.uk) upon becoming aware of any instance or suspected instance of Financial Crime connected to the business relationship between Cash Access UK Limited and the supplier.

5.10 Cash Access UK Limited has a responsibility to detect and prevent Financial Crime, accordingly, suppliers shall comply with Cash Access UK Limited procedures, relating to due diligence and the verification of the legitimate nature of:

(a) supplier entities;

(b) payment processes and funding arrangements; and

(c) any other aspects of the goods and service provision by the supplier, as are notified to the supplier from time to time.

5.11 Sanctions are laws or regulations that place restrictions on activities or transactions with certain governments, organisations, entities, individuals, countries or territories. They are generally adopted to address behaviours or actions that are viewed as problematic by the international community, such as human rights violations, civil oppression, military aggression, terrorism or the development of nuclear, chemical or biological weapons.

5.12 Cash Access UK Limited will perform appropriate due diligence and risk assessments relating to sanctions prior to and during any contractual commitment with a supplier. This will include screening of supplier organisations as well as persons associated with them, including their shareholders and ultimate beneficial owners. In certain circumstances, where screening reveals concerns that lead to a non-compliance with the Cash Access UK Limited sanctions policy, our ability to engage with or continue to engage with a supplier will be restricted..

5.14 Cash Access UK Limited expects all suppliers to adopt appropriate policy and procedures to ensure they do not engage with a sanctioned entity within their own supply chain.

6 Environmental Responsibility

6.1 Suppliers shall comply with all relevant law pertaining to the environment and shall operate their business in an environmentally responsible way.

6.2 Suppliers shall take a proactive approach to working with Cash Access UK Limited towards reducing our environmental impact.

6.3 Suppliers shall:

- (a) adopt such practices and utilise such systems that minimise the use of resources e.g. water efficiency, energy efficiency;
- (b) ensure that it and its suppliers use environmentally friendly working practices, tools and equipment, consumables and replacement parts, wherever possible;
- (c) ensure where practicable that all consumables originate from a sustainable or recycled source;
- (d) ensure there are facilities or arrangements in place, either directly or through its suppliers to ensure we can return used packaging for recycling, reuse or environmentally friendly disposal; and
- (e) ensure that any hazardous or toxic waste that is produced must be properly identified and disposed of by licensed and competent bodies via authorised and/or licensed means.

6.4 Suppliers should, upon request be able to provide an environmental impact report.

7 Data Protection and Information Security

7.1 Suppliers shall comply with all relevant law pertaining to data protection and shall not do or omit to do anything which would cause Cash Access UK Limited to be in breach of such relevant law.

7.2 To the extent that the supplier will be processing personal data on behalf of Cash Access UK Limited, it will do so only in accordance with applicable laws, Good Industry Practice and the agreed contractual terms.

7.3 Suppliers will demonstrate appropriate internal information security related controls and objectives, including requirements such as minimum ICT security requirements (e.g. compliance with, or, where not practicable or proportionate to achieve, comparable with ISO/IEC 27000 and in accordance with Good Industry Practice), specifications of data lifecycles, and any requirements regarding to data security, network security, and security monitoring processes.

7.4 Suppliers are expected to have a current Cyber Essentials certificate or be working towards the certification as a minimum. Cyber Essentials Plus is favourable.

8 Health & Safety Code of Conduct

8.1 Cash Access UK Limited acknowledges and accepts our responsibilities under relevant law for securing and maintaining high standards of health, safety and welfare for all who are directly employed or contracted to work within our offices, communities Hubs, and other Sites.

8.2 Cash Access UK Limited requires that a safe and healthy workplace is provided for all supplier personnel and that of the Health and Safety at Work Act 1974 and all other relevant law pertaining to health and safety is complied with at all times.

8.3 Health and Safety in the workplace shall be the responsibility of a senior member of the supplier's management.