



# Supplier Code of Conduct

## **Document Version Control**

Any proposed internal changes may be submitted by Checkout.com's employees to the Legal Team and Procurement Manager for consideration. The Legal Team, Regulatory Compliance Team and Procurement Manager may also initiate changes to this document, as necessary, to adjust the content to legal developments or changes of internal processes. Any and all changes to this document must be approved by the Board of Directors of Checkout Ltd.

## Supplier Code of Conduct

Checkout.com holds itself to high business standards and we want to work with suppliers who do the same. We want to ensure that those people with whom we deal and in particular our suppliers and our representatives live up to our values and standards and promote high legal, ethical, corporate and employee-related standards in their own businesses.

We appreciate that you may have your own internal standards and values and therefore not all statements and principles below are contractually binding, but we expect that the below are reflective and compatible with your own standards and values so we can work together.

We ask you to commit to working with us in accordance with the spirit of the standards, values and principles set out below and in compliance with all local laws, as a minimum.

### 1. Forced or Involuntary Labour

You will not use forced or involuntary labour of any type (e.g., forced, bonded, indentured or involuntary prison labour); employment is voluntary.

### 2. Child Labour

You will not use child labour and you will employ only workers who meet the minimum legal age requirement for their country. We support the use of legitimate workplace apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs.

### 3. Wages and Benefits

You will, at a minimum, comply with all applicable wage and hour laws and regulations (including those relating to minimum wages, overtime hours, piece rates and other elements of compensation) and you will provide legally mandated benefits.

### 4. Working Hours

You will not exceed prevailing local law work hours and will appropriately compensate overtime. Supplier shall not require Supplier's employees to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent and in accordance with applicable law.

### 5. Non-discrimination

You will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability.

### 6. Respect and Dignity

You will treat all your employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment.

### 7. Freedom of Association

You shall respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions.

### 8. Human Rights

You will respect all internationally proclaimed human rights.

### 9. Health and Safety

You will provide your employees with a safe and healthy workplace in compliance with all applicable laws and regulations.

### 10. Protection of the Environment

You will operate in a manner that seeks to be protective of the environment and you will comply with all applicable environmental laws, regulations, standards and reporting as applicable to your business and your provision of services to us.

**11. Laws, Including Regulations and Other Legal Requirements**

You will comply with all applicable laws and regulations in all locations where you conduct business.

**12. Ethical Dealings**

You will observe the highest ethical principles in your interaction with us and you, in particular, you will strictly comply with all laws and regulations on bribery, corruption and prohibited business practices.

You won't take advantage of others through manipulation, concealment, abuse of confidential information, misrepresentation of facts or other unfair business practises and you have training in place to ensure your staff understand appropriate behaviours.

You and your subsidiaries and affiliates (and your and their staff) have not and will not offer, promise or make, or agree to make any payments or gifts (of money or anything of value) directly or indirectly to anyone representing Checkout.com or for the purpose of influencing, or inducing anyone to influence, decisions in favour of Checkout.com or any of its subsidiaries or affiliates. This means, for example, any form of facilitation payment (i.e. bribes paid to facilitate government action) is prohibited.

**13. Communications**

You must make the terms of this Code of Conduct or your own similar policy/principles and other relevant information which cover the same principles, standards and values available to your employees.

**14. Monitoring/Record Keeping**

You have in place internal policies consistent with the terms of this Code and you agree to provide us with access to/evidence of that documentation upon our reasonable request, provided always that nothing shall oblige you to breach any applicable law or regulation. To the extent not already in place, you shall strive to implement policies, procedures and management oversight to ensure effective compliance with by you and your staff of the above standards, values and principles as soon as possible.

**15. Suppliers and Agents**

You shall use reasonable efforts to ensure that your relevant suppliers and agents engaged in the provisions of goods and/or services to us comply with this Code or your own similar policy/principles which cover the same principles, standards and values.

Please direct any questions to [Procurement@checkout.com](mailto:Procurement@checkout.com)