

Modern Slavery and Human Trafficking Statement | 2021



Introduction

This statement outlines our global approach to modern slavery and human trafficking for the financial year ending 30th of June 2021, and is made pursuant to section 54(1) of the Modern Slavery Act (2015) in the UK, and in respect of Reward Gateway Pty Limited (ACN 141 363 564) in Australia, the Modern Slavery Act, 2018 (Cth).

As a global employee engagement technology provider, Reward Gateway understands the importance of removing slavery and human trafficking from our society. We live by our 'Think Global' and 'We Are Human' values inside and outside of our business.

Our Mission "to make the world a better place to work" is one we take seriously and is at the forefront of everything we do. Modern slavery is equally unacceptable outside or within our business operations, and working with our teams and others to eradicate it aligns with our overall approach to human rights and furthering our Mission.

We all have a responsibility to be alert to the risks, and everyone at Reward Gateway is expected to report concerns through the appropriate channels, with management acting upon them quickly and efficiently.

Quick Stats

450+ Global employees	7 offices Around the world	45% Leadership and employee owned
5 million+ Global audience	2,000+ clients Trust us with their employee engagement	1,900+ retailers Partner with us

Structure

Reward Gateway is a Software as a Service (SaaS) business that helps more than 2,000 of the world’s leading companies to attract, engage and retain their best people with an employee engagement platform that brings employee benefits, discounts and perks, reward and recognition, employee wellbeing, employee communications and employee survey tools into one unified hub.

For the reporting period, ownership of the business was split between Great Hill Partners (a private equity firm based in Boston, US) and our employees through an employee share scheme.¹ Our global parent company is RG Engagement Group (Ltd) registered in the UK.

Below is a list of our 5 global trading entities, along with their company numbers, registered addresses, and employee headcount as of 30th June 2021 (end of reporting financial year).

Trading name	Country	Registered address	Company no.	Headcount
RG Engagement Group (Ltd)	UK	265 Tottenham Court Rd, London, W1T 7RQ	09704342	n/a
Reward Gateway UK (Ltd)	UK	265 Tottenham Court Rd, London, W1T 7RQ	05696250	135~
Reward Gateway Pty (Limited)	AUS	Australia Square Plaza, 13/95 Pitt Street, Sydney, NSW 2000	40141363564	40~
Reward Gateway	Bulgaria	59 Iztochen Blvd, Floor 3, Kamenitza Office Park, 4000 Kamenitza Plovdiv,	N/A ²	245~
Reward Gateway Inc.	USA	141 Tremont St, Boston, MA 02111	33-1220853	35~

¹ On the 4th of August 2021, Great Hill Partners sold their ownership of the business to Castik Capital (Munich, Germany) and Abry Partners (Boston, US).

² The Bulgarian business is a branch of Reward Gateway UK (Ltd), and therefore shares the same company number.

Operations

Founded in London in 2006, we employ over 450 people spread across four countries with offices in London, Sydney, Melbourne, Plovdiv, Boston and Rochester (USA). Our geographically diverse Global Leadership Team is responsible for all operations within our Group. You can find out more about our Leadership Team [here](#).

Our People

Reward Gateway operates a rigorous recruitment selection process for all hiring decisions, which includes obtaining documented proof of a person's right to work in the country in which they will be employed. We pay market-rate wages, and will always pay colleagues at least the minimum wage rate applicable in the geography in which they work. In the UK, we are an accredited Living Wage employer with the Real Living Wage Foundation.

We are passionate about doing business the right way, and all of our colleagues are expected to demonstrate the highest ethics. All colleagues are guided by our Mission, and the eight [Values](#) which we share. Our values shape how we think, plan and make decisions to deliver on our Mission and best serve our customers.

Our Employee Handbook

The Reward Gateway Employee Handbook (can be shared upon request) is issued to every employee when they join the business and is a point of reference for all our People regarding our Mission, culture, behaviours, policies and processes. In relation to risks associated with modern slavery, the following policies are the most relevant:

- **Anti-Bullying and Harassment Policy;**
- **Anti-Fraud and Anti-Bribery Policy;**
- **Whistleblowing Policy.**

Our response to COVID-19

We adapted our approach to wellbeing and support throughout the COVID-19 pandemic, ensuring that employee safety and health was at the heart of our decision making. We continue to offer flexible working to all employees, when practical, and ensure that our People are supported throughout various government lockdown's in

each of the countries where we operate. Our approach has earned us an award for [‘Brilliance in Internal Comms Campaign \(COVID-19\)’](#).

Supply Chain

Whilst we resource our core services in-house where we have full control and visibility, like many large businesses we have a large and complex supply chain, especially in the fulfilment part of our benefits and rewards products. Our suppliers are split into two categories:

1. **Retailers and other partners** who we work with to deliver our benefits and reward products to our customers;
2. **Direct suppliers** who provide a variety of products and services used by our teams across the globe.

Retailers and other partners

Whilst almost all of our direct suppliers are in countries where the risk of slavery and human trafficking is low, we are conscious that the 1,900+ retailers and other partners that we work with globally have their own complex supply chains that involve higher risk areas. We continue to vet our existing partners to ensure they are compliant with modern slavery legislation and aligned with our own standards.

Along with monitoring our existing partnerships, we continue to review and adapt our onboarding process to include relevant assurance questions about modern slavery and ensure that future partners align with our values and are compliant with local laws. These reviews and actions are taking place with our partner, the Slave-Free Alliance.

We also continue to monitor industry and consumer news to be alert to modern slavery within the retail space. If and when we are made aware of any serious human rights violations within our partner network, we will act quickly and proportionally. During the Financial Year for which this statement refers, we did not identify any of our retail partners who have fallen below our standards.

A Case Study Example

On the 6th of July 2020, we were made aware that one of our retail partners may have been in breach of the Modern Slavery Act and other UK employment law. A UK media outlet released an investigative article alleging that following a COVID-19 inspection, one of the retailer's UK suppliers was paying its staff below the legal minimum wage.

What action did we take?

1. Paused the Retailers' offers across all of our sites whilst we conducted our own investigation into the allegations.
2. Spoke in depth with Retailers' Affiliate Partnerships team to make clear our stance on modern slavery, verify the truth of the allegations, and understand what actions they were being taken.
3. Upon receiving satisfactory information from the Retailers' team regarding the allegations, and their actions, we resumed the offers across our platforms.
4. Once resumed, the merchant page for the Retailers' offers included information about the actions the business are taking, and a link to their Modern Slavery Statement.
5. Produced a detailed Incident Report documenting our process for storage with other Incident Reports.
6. Communicated the incident to our global employee base through our own Engagement Platform, to raise awareness of our stance on modern slavery.

This incident has given our Retail Team a framework for how to handle serious allegations of breaches of modern slavery laws by retail partners, and will act as a template in how we handle future similar incidents, should they arise.

Direct suppliers

Given the nature of our business, our direct supply chain mostly consists of service providers and the procurement of other software-related goods and services to aid our operations and empower our People. We source goods and services from reputable suppliers and the nature of the goods and services we procure do not demand the types of labour at risk from slavery and human trafficking.

Service providers (mostly digital) that we rely on to operate are chosen primarily by the individual teams who are responsible for implementing them and managing the ongoing relationship. We have no central procurement department, however we

Modern Slavery and Human Trafficking Statement | 2021

have a centralised Information and Security team who ensure compliance with GDPR and other security and supplier standards.

You can find out more about our Security Standards at rg.co/security

The physical products we procure are minimal because of the nature of our business. All of our staff use technology products in order to fulfill their job roles and to stay connected with the business and each other. All of the technology products we procure are from reputable, global businesses.

We partner with Fair Trade accredited suppliers for many of the products used in our offices. Many of these businesses have been chosen not only because of their focus on treating people in their supply chain fairly, but also because of their alignment with our Mission.

As we continue to improve our supplier network, we foresee more opportunities to partner with innovative suppliers who share our values and can in fact help us in achieving our Mission.

In line with our goals set out in our previous statement, we have also created and published a **Supplier Code of Conduct** to help us ensure that we are partnering with suppliers who share our values and beliefs.

Our teams across the world are now able to share with all suppliers to set out clear expectations before we begin working together. Reward Gateway's Supplier Code of Conduct can be viewed and shared at rg.co/suppliercodeofconduct.

Risks of modern slavery

At the beginning of the reporting period, we conducted a 'gap analysis' exercise with our partner - [The Slave Free Alliance](#) - to understand more about potential risks of modern slavery and / or exploitation within our business and supply chain. The exercise was conducted in collaboration with senior leaders from a variety of departments within Reward Gateway. The subsequent report and recommendations have helped in forming our 3-year modern slavery strategy.

Risks that we may cause modern slavery practices;

We have identified a low risk of modern slavery practices within the operations of our business. The majority of our workforce is made up of highly skilled people who are direct employees and therefore undergo an internal and thorough recruitment process before joining our business. Once an employee has joined Reward Gateway, their information is gathered and managed through a centralised HR platform.

Any recruitment agencies we choose to partner with match our own ethical and quality standards and undergo a verification process before we partner with them. However, we understand that as they are not directly part of our business, there is a risk that they may be in breach of modern slavery practices, without our knowing.

A small percentage of our workforce are hired on temporary contracts. However, these roles are for professional service contracts and will be subject to contract terms and conditions that comply with local labour laws. We don't employ seasonal or casual workers, and are an accredited Living Wage employer in the UK.

One area in which we did identify an element of risk was through inconsistent messaging in how employees could report potential incidents of modern slavery (both internally and through our supply chain). Having a clear escalation process in place is key in empowering employees and other stakeholders to be able to report potential incidents.

Opportunity: Develop a clear whistleblowing and escalation process and communicate it through various channels to ensure that employees and external stakeholders are confident in reporting potential incidents of modern slavery and / or human rights abuses.

Risks that we may contribute to modern slavery practices;

The largest area of risk that we have identified that may contribute to modern slavery practices, is the relationships we have with 1,900+ retail partners. Many of

the retailers we partner with are through direct relations with their in-house partnerships teams, and others are through affiliate networks who we partner with.

Each of the retailer partners that we work with has their own supply chain, and as many of them are global organisations, their supply chains can be incredibly complex and exist in countries or sectors where the risk of human rights abuses is high.

The retail partners and that feature on Reward Gateway platforms often change to provide as broad a selection to end users as possible. Without effectively communicating the minimum standards that we expect from supplier partners (or via affiliate networks) there is a risk of featuring suppliers that do not meet those standards.

In addition, as we define our minimum standards and communicate them out to partners, an additional risk lies in our ability to ensure compliance through limited internal resources.

Opportunity: Develop a Supplier Code of Conduct to outline our minimum expected standards and practices from suppliers. Imbed the Code of Conduct into terms and conditions with new suppliers so that they are fully aware of our stance and approach to non-compliance.

Risks that we may be directly linked to modern slavery practices;

We've identified relatively low risk of modern slavery through the relationships we have with direct supplier in our supply chain. The largest risk within our direct supply chain lies with the businesses that we procure technology products from.

They are global businesses who, in some cases, have supply chains which stretch into countries with a higher risk of human rights abuses.

Opportunity: Develop a Procurement Policy which is used without exception across the business. Mapping internal stakeholders who have procurement responsibilities, and delivering modern slavery / supplier relations training to equip people with the right skills to support our stance and approach.

Our stance towards slavery and human trafficking

Given the nature of our business, it continues to be our view that the risk of modern slavery in our operations is low compared to businesses operating in other sectors.

However, we do not intend to be complacent and will continue to work to improve our policies and procedures to ensure slavery and human trafficking is not taking place anywhere in our operations, and that the businesses we choose to partner with understand our stance and are themselves working towards progress.

We have a zero tolerance of modern slavery and human trafficking.

We expect all those in our supply chain and contractors to adopt a similar 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.

How we ensure our stance

Speak Up | Reward Gateway encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the business. The reporting process is designed to make it easy for workers to make disclosures, without fear of retaliation.

All employees are encouraged to speak with their line manages(s) should they become aware of any potential incidents, or alternatively they can use rg.co/speakup or the [Modern Slavery](#) page on our employee engagement platform which allows potential incidents to be reported anonymously. External stakeholders to our business can report potential incidents via compliance@rewardgateway.com.

Modern Slavery Working Group | At the beginning of 2021, we established a Modern Slavery Working Group who are responsible for steering our 3-year Modern Slavery Strategy, ensuring we are incorporating best practice, addressing any reported incidents, and identifying areas for improvement. The MS Working Group is made up of senior leaders from across a variety of functions within Reward Gateway.

Modern Slavery and Human Trafficking Statement | 2021

Employee Handbook | Reward Gateway's Employee Handbook makes clear to employees the actions and behaviours expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour internally, and when managing our supply chain.

Procurement | Reward Gateway is committed to ensuring that our retail and other partners adhere to the highest standards of ethics, and that we only partner with reputable companies who share our values and beliefs. Our retail team keep an updated record of 'high risk' retail partners to ensure their compliance with modern slavery legislation, and we issue a weighted supplier questionnaire to new suppliers, which includes questions regarding their approach to ESG (including modern slavery and human rights).

Supplier Code of Conduct | Reward Gateway's Supplier Code of Conduct outlines the standards we expect from all suppliers that we partner with, including their approach to modern slavery and human rights. The document can be viewed and shared through rg.co/suppliercodeofconduct and we are able to monitor interactions.

Agency workers | Reward Gateway uses only reputable employment agencies to source labour, and we always verify the practices of any new agency we are using before accepting workers from that agency.

[Social Value Strategy 2021](#) | Reward Gateway's Social Value Strategy 2021 is a framework to help us operate as a more sustainable business. It has five core pillars all related to one or more of the United Nations Sustainable Development Goals.

Community Innovation Lead | This is a new role within Reward Gateway, which is responsible for developing and delivering our Social Value Strategy. Our Community Innovation Lead is responsible for ensuring our compliance with modern slavery legislation in the countries that we operate, and reports to our Group HR Director.

[Slave Free Alliance](#) | In June 2020, and in accordance with our 2019/2020 Modern Slavery Statement, Reward Gateway joined the Slave Free Alliance through a 3-year membership. The SFA is a social enterprise that works with organisations that are committed to eradicating modern slavery from their global supply chain.

Modern Slavery and Human Trafficking Statement | 2021

Learning & Development | Every employee at Reward Gateway has access to a variety of learning and development tools to support their growth. Through our partnership with the Slave Free Alliance, we are able to provide training to key teams and departments to provide them with the right skills to support our modern slavery agenda.

[RG Foundation](#) | In 2018 we registered an independent, grant-giving charity - RG Foundation - which issues funding support to organisations that are 'making the world a fairer, safer, and more equal place to work'. Since its inception, RG Foundation has issued £80,000 to charities who are on the front-line in the fight against modern slavery and human trafficking.

Events and networks | Reward Gateway has a large network of employers and HR leaders. Through our events and content, we are able to raise the profile of organisations we support, as well as the importance of modern slavery awareness.

Our products and technology | Reward Gateway's engagement platform can be used by our clients to communicate anything they like with their employee base. We use ours internally to raise awareness of modern slavery amongst our teams, and we provide our products to small, modern slavery charities free of charge.

What actions have we taken in the last 12 months?

Wider Business

Conducted a 'gap analysis' exercise with our partner the Slave Free Alliance. This exercise forced us to closely examine the different elements of our business which were most at risk of modern slavery and gain an in-depth, third party report identifying risks, opportunities and recommendations.

Using the recommendations highlighted in the gap analysis exercise, we created a 3-year 'anti-slavery plan', which includes measurable objectives and outcomes, identifies completion dates, and includes various teams and departments who will own responsibility.

Adapted and published our Social Value Strategy 2021. Through our 'clients and suppliers' pillar, we have identified a number of key objectives in relation to our modern slavery agenda.

Improved our procurement process by including a weighted supplier questionnaire which is issued to all high value vendors who are being evaluated by our teams. The questionnaire includes a section on ESG (Environmental, Social and Governance) which asks a number of questions regarding a potential vendors approach to modern slavery and human trafficking.

Established a Modern Slavery Working Group who are responsible for steering our 3 - year anti-slavery strategy, taking appropriate action regarding reported incidents, ensuring we are adopting best practice, and championing improvements.

Updated our Employee Handbook to include a section on our approach and stance towards modern slavery and human trafficking. The employee handbook is issued digitally to all new employees as part of our onboarding process, and is made available to every employee through our internal systems.

Assessed the training requirements of our teams in regards to modern slavery and human trafficking risks and actions.

Created and published our Supplier Code of Conduct to outline our standards and expectations from any supplier we work with, and ensure that we are partnering with organisations who share our values and vision.

Retail Team

Continued to monitor retailer partners with £1mil+ turnover to ensure their compliance with the UK's Modern Slavery Act (2015) and the Commonwealth Modern Slavery Act 2018 (Cth) in Australia.

Global Retail Team undertook modern slavery awareness and escalation training with the Slave Free Alliance. The training was designed to improve general knowledge of modern slavery, as well as provide some practical tools for working with supplier partners.

Developed incident reporting process through interactions with a retail partner who had been accused of breaching modern slavery legislation.

Partnerships and Outreach

Continued our membership with the Slave Free Alliance to help us identify gaps in our approach and a 3-year strategy for improvements.

Continued our membership of Business in the Community who are supporting our approach to responsible business in a variety of areas.

Provide our employee engagement products at zero cost to a number of small charities who are on the front-line in the fight against modern slavery.

Looking ahead

Over the next 12 months, we will continue to build on our current approach to managing the risk of slavery and human trafficking within our business. Our ambitions include:

- Adapt contractual terms with Retail Partners to include reference and adherence to Reward Gateway's Supplier Code of Conduct.
- Clarify our whistleblowing process for reporting incidents of modern slavery for all stakeholders related to our business.
- Clarify the 'Escalation Policy' within our Employee Handbook and other forms of employee communication, to ensure clarity regarding reporting potential incidents of modern slavery and / or exploitation.
- Deliver modern slavery awareness training to our Retail Team and any other Reward Gateway employee who manages supplier relationships.
- Launch a 'Modern Slavery Awareness Programme' to be delivered online through our EMS learning platform.
- Create 'Modern Slavery Awareness Hub' on our internal employee engagement platform, and adapt so that it can be used as a template by clients to communicate their own modern slavery agenda.

Assessing the effectiveness of these actions

We understand that the modern slavery risk is not static, and we will continue improving our approach to mitigating this risk in the year ahead. The actions that we are taking to assess the effectiveness of our approach are:

1. Continuing our annual review of our Modern Slavery Statement
2. Seeking advice and support through our partnership with the Slave Free Alliance.
3. Continue to monitor and report on any incidents of alleged breaches of modern slavery law.
4. Evaluate any training or engagement activities that we conduct with our People.

Modern Slavery and Human Trafficking Statement | 2021

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in the UK and the Commonwealth Modern Slavery Act 2018 in Australia, and constitutes the Reward Gateway statement on the prevention of slavery and human trafficking for the financial year ending 30 June 2021.

It has been approved and endorsed by the board of directors of Reward Gateway UK Limited (company number 05696250) and Reward Gateway Pty Limited (ACN 141 363 564).

Part of our process was to consult and collaborate with the relevant entities we own or control as part of this statement.

Signed and approved by:

A handwritten signature in black ink that reads "Doug Butler". The signature is written in a cursive style with a large initial 'D' and 'B'.

Doug Butler
Chief Executive Officer