

Blackhawk Network, Inc. (Arizona, USA)
Modern Slavery and Human Trafficking Statement

This statement is made pursuant to the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) (Australia).

We are committed to operating our business lawfully and ethically and in only working with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking, and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity. We have a whistle-blower policy and an external hotline for staff and suppliers to use.

Our Structure

Blackhawk Network Holdings, Inc. (Delaware, USA) is a privately-owned, US company headquartered in Pleasanton, CA with over 4,000 employees worldwide and operations in 19 countries. We deliver branded payment programs to help meet today's most challenging business objectives. We collaborate with our partners to innovate, translating market trends in branded payments to extend reach, build loyalty and increase revenue. We offer a portfolio of comprehensive services to help ensure the success of our partners' branded payment programs, including design, distribution, fulfilment, and marketing.

Our Supply Chains

Our supply chain operations relate to the production and fulfilment of physical gift cards, technology partners that support back-end payment processing, merchandise provided by various retailers for loyalty, award, and promotion purposes, and suppliers that directly support our day-to-day administrative functions. Due to the nature of our business and that of our supply chain, we have assessed that there is very low risk of modern slavery and human trafficking. Nevertheless, we have implemented a number of processes and controls to further limit the risk of slavery or human trafficking in our supply chains or in any part of our business. The relationships with most of our suppliers have been established over a number of years and have been built on integrity and mutual trust. We conduct due diligence on suppliers through research at the initial set up phase, by including relevant clauses in contracts, and sending questionnaires to suppliers. We monitor the outputs of these and take appropriate action when we believe it is necessary.

Our Policies

We have a Code of Business Conduct and Ethics. This Code serves to guide the actions of our employees consistent with the values of Blackhawk Network. The Code emphasises our commitment to doing business responsibly, ethically, and honestly. This is about more than staying out of the headlines and avoiding legal issues – it's about fostering a workplace that values trust, quality, and fairness within the company, and with our customers, suppliers and business partners. Our Code outlines principles to help employees do the right thing and encourages employees to speak up and report any Code violations that they see or suspect.

Our Supplier Code of Conduct details what we expect from our suppliers with regards to:

- Business Practices and Ethics
- Labour Practices and Human Rights
- Environmental Protection
- Compliance and Reporting

We encourage our suppliers to require their subcontractors to acknowledge and implement equivalent standards of conduct.

We also have a formal Supplier Risk Management Program for assessing the risks and controls of our suppliers. Through this process, we perform due diligence on our suppliers to address the risks of modern slavery and human trafficking. If issues are identified, our Program includes escalation and remediation procedures to help ensure that we do not support suppliers that exhibit modern slavery risks.

We also have a process for all employees and external partners to be able to report a 'Serious Incident', which includes any concerns over slavery and human trafficking.

Our Training

We train all employees on relevant legislative requirements which impact our business. We regularly communicate our company policies through our intranet, and roll out relevant training courses annually, which include training specific to Modern Slavery and Human Trafficking.

Future Commitments

In the future, we expect to conduct internal reviews to help validate that our supplier management policies are functioning as expected.

Approval

This statement relates to Blackhawk Network, Inc. (Arizona, USA) and its subsidiaries, including but not limited to the following: Blackhawk Network (Europe) Limited, Blackhawk Network (UK) Limited, Blackhawk Network (Australia) Pty Ltd, Hawk Incentives Limited, Cyclescheme Limited, GVS Prepaid Limited, and The Gift Voucher Shop Limited.

This statement has been approved by Blackhawk Network, Inc. (Arizona, US) and the Board of Directors of Blackhawk Network (Australia) Pty Ltd and will be reviewed and updated as necessary on an annual basis.

Dated: 9/21/2022

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Kirsten E. Richesson, General Counsel