

# Modern Slavery and Human Trafficking Statement 2020/2021



## Introduction

This statement outlines our global approach to modern slavery and human trafficking 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 the leading employee engagement technology provider, Reward Gateway understands the importance of removing slavery and human trafficking from our global 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 unacceptable within our business operations, and working with our teams and others to eradicate it is part of 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

<b>430+</b> Global employees	<b>6 offices</b> Around the world	<b>45%</b> Leadership and employee owned
<b>5 million</b> Global audience	<b>1,800+ clients</b> Trust us with their employee engagement	<b>1,900+ retailers</b> Partner with us

## Structure

Reward Gateway is a Software as a Service (SaaS) business that helps more than 1,800 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.

Ownership of our business is split between Great Hill Partners, who are a Private Equity firm based in Boston, USA, and our own employees through an Employee Share Scheme. 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 2020 (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	0
Reward Gateway UK (Ltd)	UK	265 Tottenham Court Rd, London, W1T 7RQ	05696250	132
Reward Gateway Pty (Limited)	AUS	Australia Square Plaza, 13/95 Pitt Street, Sydney, NSW 2000	40141363564	38
Reward Gateway	Bulgaria	59 Iztochen Blvd, Floor 3, Kamenitza Office Park, 4000 Kamenitza Plovdiv,	N/A*	233
Reward Gateway Inc.	USA	141 Tremont St, Boston, MA 02111	33-1220853	32

\*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 430 people spread across four countries with offices in London, Sydney, Melbourne, Plovdiv, Boston and Rochester (USA). Our 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 the individual'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.

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.

The Employee Handbook lays out our zero tolerance on bullying through our **Anti-Bullying and Harassment Policy**; our commitment to conducting business in an open and ethical way through our **Anti-Fraud and Anti-Bribery Policy**; and how and what we encourage employees to disclose to management through our **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 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 including engineering in-house where we have full control and visibility, like most large businesses we have a large supply chain, especially in the fulfilment part of our benefits and rewards products. Our suppliers are split into two categories:

1. **Retailers** who we partner 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.

### Retail 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 that we work with globally have their own complex supply chains that involve higher risk areas.

We have begun the process of vetting our existing 1,900+ retailers to ensure they are compliant with the modern slavery legislation where we operate and aligned with our own standards. Along with monitoring our existing partnerships, we are reviewing our onboarding process to include relevant assurance questions about modern slavery to ensure future partners are compliant. These reviews and actions are taking place with the Slave-Free Alliance who are a partner of ours for the next three years.

We 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. However, a recent incident occurred which we would like to include:

### A Case Study Example

On the 6th of July 2020, we were made aware that one of the retail partners we work with 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 taking.
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.

A copy of the Incident Report can be provided upon request.

### 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.

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Service providers that we rely on (mostly digital) 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 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 as well as other direct supplier standards at [rq.co/security](http://rq.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 fulfil their job roles and stay connected with the business. 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. Examples include:

- **Change please** - A social enterprise coffee supplier that provides barista training to homeless people.
- **Who Gives a Crap** - A social enterprise toilet paper supplier that donates 50% of revenue to building toilets in developing countries.
- **Soap Co** - A social enterprise soap supplier who provides working opportunities to people who are blind, disabled or otherwise disadvantaged.

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.

### Risks of Modern Slavery

#### **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 the business, 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.

#### **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 our 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 where the risk of human rights abuses is high.

There are also smaller retailers who we partner with that will not be legally required to comply with modern slavery laws, who therefore are more difficult to assess as a risk due to a lack of transparency.

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

We've identified relatively low risk through the other organisations in our supply chain and who we have relationships with. The main risk lies within our direct supply chain and the businesses that we procure technology products from. They

are global businesses who source some of their raw materials from countries with a higher risk of human rights abuses.

### 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 supply chain 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.

#### **We have zero tolerance of slavery and human trafficking.**

We expect all those in our supply chain and contractors to adopt the same 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. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The reporting process is designed to make it easy for workers to make disclosures, without fear of retaliation. Those who have concerns can raise them via their line manager, the People Team or by emailing [compliance@rewardgateway.com](mailto:compliance@rewardgateway.com). We also have a dedicated channel on our internal instant messaging platform (Slack) to report risks and potential incidents of modern slavery violations.

**Employee Handbook** | Reward Gateway's 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 both in the UK, and abroad, 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 we only partner with



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reputable companies to ensure this. Our retail team keep an updated record of 'high risk' retail partners to ensure their compliance with modern slavery legislation.

**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 2020** | Reward Gateway's Social Value Strategy 2020 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 (SFA), Reward Gateway joined the Slave Free Alliance in a 3-year membership. The SFA is a social enterprise who work with organisations that are committed to eradicating modern slavery from their global supply chain.

**[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

1. Published our Social Value Strategy 2020.
2. Supported Disrupt HR as a key sponsor and contributor. The proceeds from this event go directly to support the work of Hope for Justice and their fight in eradicating modern Slavery.
3. Volunteered our skills to charities who work to eradicate modern Slavery.
4. Partnered with Fair Trade accredited, direct suppliers, some of whom are completely aligned with our Mission.
5. Employed a Community Innovation Lead who is operationally responsible for building on our approach to modern slavery and ensuring global compliance.

### Retail Team

1. 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.
2. Global Retail Team undertook modern slavery awareness 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.
3. Developed incident reporting process through interactions with a retail partner who had been accused of breaching modern slavery legislation.

### Partnerships and Outreach

1. Became a member of the SFA to help us identify gaps in our approach and a 3-year strategy for improvements.
2. RG Foundation issued a £20,000 grant to Hope For Justice to support their work in eradicating modern slavery, and a £20,000 grant to Snowdrop Project to help fund their work supporting victims of modern slavery and human trafficking in Sheffield, UK.
3. 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:

- Develop and publish our Social Value Strategy 2021 including objectives to progress our modern slavery agenda.
- Conduct a 'gap analysis' with SFA to identify potential 'blind-spots' within our operations and supply chain.
- Outline a 3-year 'anti-modern slavery strategy' based on the recommendations from the SFA following a the gap analysis exercise.
- Establish a modern slavery Working Group to support the progress of our modern slavery agenda.
- Clarify our whistleblowing process for reporting incidences of modern slavery for all stakeholders related to our business.
- Join Business in the Community who are a membership organisation that support others in their journey to becoming a more responsible business.
- Provide a platform for modern slavery organisations to raise awareness of their work with our clients base.
- Develop a supplier Code of Conduct with express mention of our stance and expectations regarding modern slavery.
- Complete a training 'needs assessment' in regards to modern slavery awareness at different management levels across the business.
- Continue to support small charities who are on the front-line of eradicating modern slavery through our own products/services, amplifying their voice internally and externally, and through financial contributions.

### 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. Conducting an internal 'Gap Analysis through our partnership with the Slave Free Alliance.
3. Continue to monitor and report on any incidents of alleged breaches of modern slavery practices.
4. Evaluate any training or engagement activities we conduct with our People.

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 2020.

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).

Signed and approved by:



**Doug Butler**  
Chief Executive Officer