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Group supplier code of conduct and ethics.

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Contents

Statement from the Group Chief Executive 4

Why we need this supplier code of conduct and ethics 7

How we can be ‘Unstoppable Together’ 7

What’s in scope 7

Corporate governance 8

Management systems..... 10

Labour 11

Health and safety at work 14

Bulletproof core 15

Environment management 17

Sustainability 18

Audit 18

Continual improvement 19

Contact List 19

Document control

The version of this document cancels and replaces all previous versions and should be removed from circulation.

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Approval	Role	Name
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Reviewer	Group Governance and Compliance Manager	Karen Jemma

Document history

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1	Establish, implement, publish, and communicate the code	16 May 2023
2	Updated to integrate with the internal Code of Conduct and Ethics	16 Oct 2023
3	Design edit	23 Oct 2023
4	Incorporation of AI Systems use and AI ethics	18 Jul 2024
5	Review and updated template due to name change	14 Apr 2025
6	Review completed update to data and addition of Hastee. Update to new template	11 June 2026
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Statement from the Group Chief Executive



We revised our purpose statement which is to 'power exceptional employee experiences, so you and your people do better.'

This statement includes commitments we have made that apply to all our third-party relationships, whether defined as business partners, sub-processors, valued suppliers and / or contractors. An important part of those ongoing commitments include setting and maintaining the highest standards for conduct and ethical practice within our supply chain.

We are encouraging our suppliers to subscribe to, our **Supplier Code of Conduct and Ethics**, to help us ensure safe working conditions, the fair and respectful treatment of all people and the consistent application of ethical practices in the way we conduct business.

Overall, this code plays a big part in our commitment to upholding humanitarian rights, maintaining the best economic standards and practices and, above all, contributing to a sustainable and positive future for everyone. When we work collaboratively, we succeed together, and can deliver the exceptional experiences our customers have come to expect from us.

We hope you will join us in upholding these commitments.

John Petter

Group Chief Executive Officer, Zellis Holdings Limited

Zellis Group values

Zellis Supplier Code of Conduct and Ethics both reflects and upholds our values.



In Zellis Group, being unstoppable together means we share ownership of success, nurturing great relationships with strong focus on delivering great customer experiences. Being unstoppable together makes best practice sustainable for the betterment of our stakeholders.

The Code considers the needs of every stakeholder throughout the lifecycle of our business relationships.

We want to encourage the healthiest work environments, which respect the goals and aspiration of its people, and promotes the sharing of knowledge and creativity. This leads to the development of our core strengths and opportunities to build skills with each other through lessons learned.

Our Supplier Code of Conduct and Ethics is designed so that we test ourselves, our product and service offerings to make them better for everyone.



Everything we do is delivered with attention, precision and pace to ensure we meet the standards which our customers and end-users expect. We are always working to unlock further value in our products and service provision and foster an environment focused on delivering the best outcomes for you and your people.

Our code reflects our commitment to standards to which we hold ourselves for quality, consistency and results.

At Zellis Group, we think big, which means emphasising long-term solutions and sustainable strategies that are cost effective and scalable and reflect the requirements of our customers.

We encourage our suppliers to adopt a similar mindset by delivering products and services that are flexible, adaptable and mindful of the future, to increase resiliency across our supply chain.



About Zellis Group

As the expert provider of payroll and HR solutions for UK and Ireland, Zellis Group delivers a range of specialist products and services through its three core brands: Zellis, Benifex, Moorepay and Hastee. In total, Zellis Group currently has a team of about 2400 expert employees across the UK, Ireland, and India.

Each month, over 5 million employees across the UK and Ireland are paid through Zellis solutions. Zellis provides award-winning payroll and human capital management (HCM) software in the form of its flagship product, Zellis HCM Cloud. It is also the trusted Managed Services partner to more than 120 customers, delivering complex payroll, HR, background checking, and consultancy requirements from dedicated service centres across three geographies.

Founded in 1966, Moorepay provides payroll and HR solutions to small and medium-sized organisations in the UK and Ireland. With over 500 qualified staff, the company delivers its own distinct software and managed service offerings, tailored to the needs of SMEs. Its specialisms include employment law consultancy and health and safety services among others.

Benifex is Zellis Group's specialist in employee benefits, reward, recognition, and communications. Benifex supports over 2 million employees in 80 global organisations across the UK, USA, Europe, and South-East Asia. Benifex's OneHub platform enables customers to design, manage and deliver meaningful employee experiences, from benefits and communications to recognition and wellbeing, all in one place.

Hastee was acquired by Zellis Group in 2025. Hastee is a financial wellbeing and earned-wage-access provider providing a comprehensive suite of financial wellbeing tools, including on-demand earned wage access, personalised financial education, intuitive money management tools, state-benefits eligibility-checking, and detailed analytics into employee financial wellness.

Why we need this supplier code of conduct and ethics

Zellis Group relies on our suppliers for the delivery of many services to our customers, colleagues and business partners. While underpinned by a contractual relationship, this reliance is based on corporate governance principles and values influencing high standards of ethical and professional behaviour. The overall objective of this supplier code of conduct and ethics is to build trusting and open relationships between Zellis Group and its suppliers, enabling strong performance and delivery of products and services.

This code sets out the behaviours we would expect of each other, including commitments on how Zellis Group upholds ethical and professional engagement, how we will be fair and transparent in our dealings, and how we proactively work with suppliers to deliver value.

In selecting suppliers, Zellis Group checks it is contracting with reputable bodies. These checks are conducted in line with procurement standards, guaranteeing fair access to opportunities for all suppliers and equal treatment during selection processes. As we move from procurement to the life of the contract, we expect delivery in accordance with the spirit and to the contract terms. We expect our suppliers, in delivering goods and services to live up to the reputation of Zellis Group.

We recognise a supplier can only be as good as its customer and we want to reassure our suppliers that we adopt a collaborate approach in the management of third-party risk, assigning specific duties to each party based on respective accountability and expertise.

How we can be ‘Unstoppable Together’

We assign roles, responsibility, authority, and accountability in the commercial agreements held by Zellis Group or any of its subsidiaries. This helps us forge exceptional relationships based on clarity and understanding, setting both parties up for success.

We nurture these relationships through a formalised supplier relationship management process. This enables us to collaboratively assess performance and exploit opportunities for improvement when we can achieve further value.

Suppliers are expected to read and understand Zellis Group supplier code of conduct and ethics. We expect this to be shared and communicated with any stakeholder involved in delivering products and services for Zellis Group. Queries can be raised with your dedicated supplier relationship manager at Zellis Group.

What’s in scope

All third-party relations with Zellis Group are in scope of this supplier code of conduct and ethics under our definition of suppliers. Suppliers are defined as a third-party having a business relationship with Zellis Group or any of its subsidiaries, be they are partner, sub-processor or valued supplier and / or contractor or consultant under contract for specific services.



Corporate governance

Leadership commitment and accountability

Zellis Group complies with the 'Wates corporate governance principles for large private companies'. [The Wates Corporate Governance Principles for Large Private Companies \(frc.org.uk\)](https://www.frc.org.uk). Together with our robust governance, risk and compliance programme, we mirror our ways of working within our supply chain to manage all types of third-party risk and behavioural and ethical codes of conduct.

We encourage suppliers to have appropriate corporate governance provisions that provide a steer in developing and operationalising corporate plans. Our recommendation is for suppliers to be values-led and outcomes-focused. We expect our suppliers to design and implement appropriate management systems and controls to enable qualitative information. We encourage this approach so we can stimulate continual improvement within the business relationship. We expect our suppliers to proactively engage and work with us whenever we see improvement opportunities.

Conflicts of interest

Suppliers must avoid actual, potential or perceived conflicts of interest with any of Zellis Group company directors and colleagues. In accordance with established laws and regulations, we expect suppliers to formally disclose conflicts of interest before we establish a business relationship. Should the conflict arise during the business relationship then the conflict must be reported in writing) to Zellis Group General Counsel, responsible for ensuring conflicts of interest are declared, recorded and managed.

Fair competition

We expect our suppliers to conduct their business in line with fair competition rules and in accordance with all applicable laws. We aim to consistently enhance the perception and understanding of our brand, building lasting business relationships and to instilling customer trust and confidence.

We require all potential or actual breaches by our suppliers to be reported to Zellis Group as soon as they are identified. We request that all potential or actual breaches are reported to our Group General Counsel who ensures responses to anti-competitive behaviour are appropriate for the protection of the business relationship and to society.

Business integrity

Zellis Group's suppliers must not practice or tolerate any form of bribery and corruption. We expect our suppliers to neither accept or offer bribes or any other unlawful incentives to or from their partners. We expect all suppliers to declare all enforcements that are related to bribery and corruption with openness and transparency.

Risk and opportunities

We aim to ensure all risks and opportunities are identified, assessed and scored, managed and remediated to an acceptable level of tolerance in a timely manner. All parties are accountable for their own respective risk-taking. Suppliers are, therefore, expected to implement mechanisms that identify, assess and manage risks in all areas addressed by this Code. We also require a robust documented risk management process to ensure risks are properly managed throughout the risk management lifecycle.

Stakeholder engagement

All suppliers are valued stakeholders to Zellis Group. We apply an inclusive approach towards supply chain management to continually add value to the products and services we offer. We therefore want to make sure we optimise our business relationship and overall product and service provision. We also want to encourage healthy discussions where we can discuss ideas and promote innovation with each other. We expect our suppliers to proactively engage with us in support of a highly effective engagement programme for the betterment of the relationship, direct and indirect stakeholders and society as a whole.

Conduct and ethics

We uphold the importance of promoting and encouraging good behaviours through a structured code of conduct and ethics. Our supplier code of conduct is aligned with and integral to our own internal code of conduct.

We expect proactive approaches are adopted to develop culture and influence behaviours for the betterment of colleagues, customers, suppliers, our industries and the wider economy. This aligns with regulatory approaches to managing conduct and ethics, but we additionally consider it morally right to aim to achieve the highest standards in this area.

AI ethics

Zellis Group participates in the development, distribution and management of tools and technology which employ several types of artificial intelligence systems. At Zellis Group we are committed to our use of Artificial Intelligence (AI) and AI development being fair, reliable and safe, respect privacy, be inclusive, transparent and accountable. Our governing practices are guided by these principles to ensure we uphold our duty for the creation of ethical, effective and lasting AI systems.

Principle 1 – Conduct of business

Principle 2 – Fairness and inclusivity

Principle 3 – Risk-based and proportionate

Principle 4 – Transparency

Principle 5 – Accountability

Principle 6 – Open relations with regulators

We expect our suppliers and subcontractors to comply with developing laws and regulations, keep pace with them to develop and formalise AI ethical practices. We expect our suppliers to notify us of any use of AI systems, validate conformity assessments for 'High-risk' AI systems and prevent the use of 'Unacceptable' use of AI systems. We expect our suppliers to notify us of any potential breach and trigger formalised product recall procedures such any harm be identified within impact assessments.

Privacy and intellectual property

Zellis Group will respect the intellectual property assets and privacy of suppliers. We expect our suppliers to safeguard and appropriately manage the use of confidential information. Suppliers must ensure all employee and business partner privacy and intellectual property rights are protected. We expect our suppliers to notify us of any potential breach as soon as an event is identified and confirmed.

We expect our suppliers and subcontractors to comply with all applicable data privacy laws and regulations for the protection and management of personal and sensitive information. Suppliers must maintain only those personal records required for business, legal or contractual purposes. Access must be limited to those who need the information for legal purposes or business need. Suppliers must also manage Zellis Group records in a manner consistent with all applicable legal requirements, Zellis Group’s policies and our records retention schedule.



Management systems

Documentation

We expect our suppliers develop and implement appropriate document management systems to integrate frameworks, policies and procedures consistent with this Supplier Code of Conduct and Ethics. Provisions should ensure minimum requirements are identified, documented and consistently applied. A secure records management system must be in place to govern the systems and controls environment to meet statutory, regulatory and commercial requirements. Provisions should be sufficient for auditing standards of compliance to the requirements of the management system.

Our statutory, regulatory and subscription commitments

Suppliers must comply with and continually monitor all applicable statutory and regulatory requirements, contractual agreements and internationally recognised standards appropriate to the context of the product and service provision. We expect all suppliers to obtain and maintain all required permits, licenses and registrations required for your business and business operations.

We encourage suppliers to align with Zellis Group’s certifications and subscriptions or equivalent.

Certification	Details	Group	Zellis	Moorepay	Zellis & Moorepay	Benifex	Hastee
CIPP - PAS	Payroll Assurance Scheme						
ISO9001	Quality management systems requirements						
SOC1 Type 2	Financial controls testingprogramme						
Cyber Essentials	UK Government Information Assurance Scheme						
ISO27001	Information technology – Security techniques – Information security management systems - Requirements						
ISO27017	Code of Practice for Information Security Controls based on ISO/IEC 27002 for cloud services						

ISO27018	Code of Practice for Protection of Personally Identifiable Information (PII) in public clouds acting as PII processors						
ISO22301	Societal security - Business continuity management systems requirements						
ISO14001	Environmental management systems (in progress)						
UN Global Compact	Voluntary subscription and code of practice and sustainable development goals within ESG.						
CDP	Voluntary subscription to a private disclosure platform which assesses standards of compliance with environmental and climate change impacts						



Labour

Zellis Group expects our suppliers provide a clear commitment to protecting human rights for all of their employees and contractors and treating them with dignity and respect. This includes at least the following minimum requirements to be incorporated into the suppliers control's environment:

Recruitment

We expect suppliers to recruit people based on unbiased treatment and fair assessment processes to ensure diversity of labour is promoted, provided this is not detrimental to the retention or quality of talent. People should be evaluated and assessed solely on their merits of work experience, career development and qualifications. Recruitment campaigns should be unbiased and operate with the intention of attracting the widest range of candidates.

Employees and contractors shall not be required to pay employers' or agents' recruitment fees or other related fees for arranging their employment.

Competency, training and awareness

Suppliers will establish appropriate competency, training and awareness programmes based on formalised training needs analysis to ensure their employees remain up to date with applicable laws, regulations and industry best practices. Zellis Group encourages knowledge sharing within our supply chains to support ongoing development and adherence to changes in industry standards.

Freely chosen employment

Zellis Group upholds the International Labour Organisation (ILO) conventions ([Conventions and Recommendations \(ilo.org\)](#)) regarding freely chosen employment, where people are free to apply for, change their role during and leave employment with their respective employer whenever they wish to do so within the terms of their contract. This principle extends to ensuring that suppliers do not impose unreasonable restrictions of movement in the workplace.

We encourage suppliers to ensure employees, and contractors are provided with a job description, and that all documentation should be recorded in English and the candidate's native language. Government issued documents, (passport, work permit, personal licenses) belonging to the employee or contractor shall not be held by suppliers or agents.

Equity diversity and inclusion

Equal treatment of all employees is a fundamental principle at Zellis Group. This is because inclusive environments allow people to express opinions, share their talent and stretch themselves in ways which lead towards better collaboration, teamwork and productivity. We expect our suppliers to develop appropriate provisions and processes to respect equality, diversity and inclusion in the workplace to support collaboration in our supply chain.

Fair treatment

We expect all our suppliers to develop, document, communicate and sustain appropriate anti-discriminatory practices, covering both conscious or unconscious behaviours, which integrate all protected characteristics under applicable discrimination laws. In the absence of local laws of a jurisdiction, we would expect the suppliers provisions to comply with UK law. (Equality Act 2010 as amended). The supplier provisions should be sufficient to prevent any kind of harassment or bullying in the workplace and include a process for conducting disciplinary procedures should they occur.

Zellis Group also expects suppliers to have appropriate processes in place to prevent unfair, wrongful and constructive dismissal.

Work environment

Suppliers must ensure their employees and subcontractors are not subjected to working conditions that jeopardise their health and safety. We uphold the need to ensure all work is performed by employees, above minimum age, particularly roles involving the heavy lifting or the use of heavy machinery. We expect our suppliers regardless of the size of business to:

- Provide a safe place to work.
- Proactively prevent health and safety hazards causing health risks.
- Ensure plant and machinery and information assets are maintained and safe to use.
- Ensure safe working practices are documented and followed, and that appropriate signage is in force, including (MSDS) Master safety data sheets for managing substances hazardous to health.
- Provide safe storage of materials including chemicals and provide appropriate PPE and training for use.
- Provide adequate first aid provisions at every site.
- Establish emergency contingencies within the organisations emergency and preparedness response.
- Ensure adequacy of physical characteristics of working premises, such as ventilation, temperature, lighting, noise, toilets and communal facilities, potable drinking water and other health and safety requirements; and
- Have clearly communicated procedures to report accidents, injuries, diseases and dangerous occurrences to appointed representatives and regulators.

Working hours, wages, and benefits

At Zellis Group we do not want our colleagues to work more than their contracted hours. We expect our suppliers to protect employee personal time and not exceed the maximum set by employment law of the jurisdiction.

Suppliers are expected to provide their employees with fair and competitive pay and benefits and should be paid for each pay period under contract. We encourage suppliers to consider living wage guidelines over and above national minimum wage parameters to improve employee quality of life. We do not encourage incentive schemes which could trigger conflicts of interest or encourage bribery and corruption. Zellis Group expects that suppliers not to use deductions from wages as a disciplinary measure. All workers, be they employees or contractors, must be paid with accuracy, completeness and on time every time to industry standards of practice.

Freedom of association

We encourage suppliers to commit to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, we expect suppliers to respect the rights of their employees to associate freely, join labour unions, seek representation, join work councils and engage in collective bargaining. Suppliers will not disadvantage employees representing workers in collective bargaining.

Worker feedback, participation and grievance

We expect our suppliers to have developed and documented processes, including an effective grievance mechanism, to assess workers understanding of, and obtain feedback regarding, violations against practices and conditions covered by this supplier code of conduct. We would expect employees and contractors to be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation to uphold fair treatment.



Health and safety at work

Risk assessment of health and safety hazards

Zellis Group recognises the importance of health and safety at work. Because we adopt a risk-based approach to our ways of working, we expect our suppliers to develop health and safety practices in the workplace based on hazard analysis and risk assessments. We expect our suppliers to provide adequate training on health and safety matters as identified from recorded risk assessments that are reviewed and updated at least annually or whenever there is a change in new products, processes, equipment and technology or a change to an individual's work environment or role.

Managing occupational health and safety

We expect all suppliers to develop appropriate procedures and ways of working which keep employees and contractors safe from any type of health and safety hazard. We require appropriate provisions to be in place from the design of workplace environments to the issue of PPE and ongoing employee training. Health and safety records to demonstrate corporate governance and best practices must be maintained in accordance with laws, regulations and subject to inspection in the event of a legitimate need.

Zellis Group expects our suppliers to ensure adequate training and ongoing upskilling is provisioned to ensure ongoing compliance with health and safety requirements.

Managing and reporting injury and illness

We expect suppliers develop and implement appropriate procedures and systems to prevent, manage, track and report occupational injury and illness. This includes having provisions to encourage employee and contractor reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate root causes and facilitate return of employees or contractors to work. Suppliers must also ensure compliance with operational and reporting requirements.



Bulletproof core

Information and cyber security

Zellis Group has strong focus on information and cyber security provisions both internally and within our supply chain. It is important to us and vital to our customers. Therefore, we expect our suppliers to ensure they have sufficient security provisions in place before we establish a business relationship and to sustain same throughout our business relationship lifecycle.

We expect, as a minimum, that suppliers develop appropriate systems and controls documented to international standards to ensure the confidentiality, integrity and availability of Zellis Group corporate information, our customer information and customer employee information. This is applicable to all Zellis Group products and services. We govern this through documented data flow maps and expect our suppliers to support us in keeping these maps up to date.

As a minimum, we encourage our suppliers to:

- Restrict access to confidential information and personally identifiable information.
- Refrain from discussing confidential business information in public places or with family and friends.
- Use care in storing and disposing of documents containing confidential information.
- Apply Zellis Group data retention schedule or as guided by Zellis Group should special conditions apply; and
- Regularly train and educate employees in adequate data privacy and protection.

Suppliers must inform Zellis Group if they become aware of any data protection or cyber security incident that affects, or has the potential to affect, Zellis Group data or that of its customers. Notification should be made directly to the Data Protection Officer.

Financial crime prevention

Zellis Group aligns its financial crime prevention provisions with the global watchdog Financial Action Task Force (FATF) and we have established, implemented and continually sustain appropriate systems and controls to govern and control our ways of working. These provisions prevent the abuse of our products and services to further financial crimes. Should any of the FATF offences be identified within the supply chain, we expect our suppliers to notify Zellis Group directly to Zellis Group Money Laundering Reporting Officer (MLRO).

We encourage our suppliers to support global initiatives to eradicate organised crime and support the development of our systems and controls within the supply chain to reduce our vulnerabilities and combat against emerging threats. Without this collaboration, Zellis Group and our suppliers would not be able to safeguard against outcomes from financial crimes which could be highly detrimental to life, be it that of men, women, children, animals, wildlife including endangered species.

Modern slavery, human trafficking, peonage, and child labour

Zellis Group recognises modern slavery, human trafficking, peonage and child labour is a financial crime of a humanitarian nature. We are completely opposed to any modern slavery, human trafficking, peonage, and child labour within our supply chain and therefore expect our suppliers avoid and proactively prevent any FATF (Financial Action Task Force) predicate crimes by developing sustainable business operations.

We expect our suppliers notify Zellis Group of any potential or existing offences of this nature as soon as they are suspected or identified.

Incident reporting and breach management

Zellis Group has a defined incident reporting and breach management process to manage information related security breaches, data protection and data privacy breaches. We encourage our suppliers to have a documented process to govern the same.

- We expect our suppliers to report all data protection and data privacy breaches to our Data Protection Officer (DPO).
- We expect our suppliers to report all information and cyber security breaches to our Chief Information Security Officer (CISO).
- We expect our suppliers to report all suspected or actual financial crimes to the Money Laundering Reporting Officer (MLRO).
- We expect our suppliers to report all conduct and ethics breaches to the Group Risk and Compliance Integration Director (GHRC).



Environment management

Environmental risk assessment

Zellis Group is fully committed towards reducing all impacts of significance we make on the environment. Our approach is based on an environmental risk assessment covering all our jurisdictions and office locations, business activities, as well as climate change impacts designed to inform where to focus our effort and design our environmental plan. This approach supports us in maintaining statutory and regulatory obligations in an auditable manner. We expect our suppliers develop their own environmental plan by utilising risk-based approaches aligned to ISO14001 and ISO5001 or equivalent internationally recognised standards. We acknowledge environment management practices may not be a core skill for our suppliers, creating challenges in how far we can effect positive change. In these instances, we recognise our supply chain may pursue offsetting provisions. Nevertheless, participation in collaborative solutions to environment management practices is encouraged.

Environmental waste and emissions

Zellis Group requires our suppliers to have processes, systems and controls designed to ensure appropriate working practices for the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health should be appropriately managed, monitored and measured. This includes the management of spills and undesired or unintended effluent or pollutant releases into our environment. We expect our suppliers to measure their environmental waste and carbon emissions in compliance with science-based targets as defined by Science Based Target Initiative (SBTI).

Resource conservation

Zellis Group considers its use of non-renewable natural resources such as water, energy, and raw materials and proactively applies a conservative approach towards consumption and usage in accordance with our environmental plan. Our plan focuses on the environmental aspects and impacts of significance which can reduce our consumption of non-renewable resources.

- We expect our suppliers to apply a similar approach towards the design, development and implementation of their own environmental plans to proactively reduce our burden on our planet.
- We encourage our suppliers to consider their production and maintenance activities from an environmental perspective and consider recycling and material re-utilisation.
- We encourage our suppliers to also consider climate change friendly products, services and processes to reduce our consumption of non-renewable resources.
- Overall, we expect our suppliers to proactively design their environmental plan to reduce greenhouse gas emissions and work towards becoming net zero in line with government and global targets.

Environment reporting and disclosure

Zellis Group is subject to environmental regulatory reporting and annual disclosure, which includes reporting on environmental impacts of significance within our supply chain. We therefore expect and encourage our suppliers to support us with meeting all environmental reporting and disclosure requirements by providing the necessary information we need to assess carbon emissions from our supply chain. To do this we need our suppliers to develop mechanisms to monitor and measure carbon emissions in a manner we can rely upon. This requires openness and transparency within our supply chain which relates to any of our products and service provision.



Sustainability

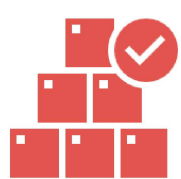
Building a sustainable future

Zellis Group is focused on short, medium, and long-term sustainability. Whilst we work to sustain economic growth, we continue to pursue diversity, build resiliency to ongoing and emerging threats, tackle environmental issues and contribute to societal initiatives close to our core strengths and to our hearts. We encourage all our suppliers to pursue a sustainability strategy, to build their operational resilience and secure our shared future.

Emergency, preparedness and response

Zellis Group is committed towards continually building our operational and financial resilience. We expect our suppliers to proactively develop their own contingency plans so that we can sustain services for our customers. We encourage a collaborative approach to design and test joint contingencies related to our products and service provision. This includes testing contingencies for adequacy whilst upskilling emergency response teams in how to handle events when they occur.

We expect our suppliers to notify Zellis Group of any event impacting our suppliers, how they are responding and whether tolerance thresholds are exceeded triggering sustainability risk exposures which could jeopardise our ability to deliver our products and services.



Audit

Supplier assurance

Zellis Group operates a comprehensive supplier assurance programme to manage third-party risk within our supply chain. The programme aims to verify and validate standards of compliance, identify opportunities for improvement and leverage opportunities for better ways of working with feedback on potential innovation. Suppliers are expected to fully collaborate and cooperate in audit activity to sustain the business relationship.

Zellis Group requires our suppliers to fully cooperate in all supplier assurance activities conducted by the Group Governance, Risk and Compliance programme. In return, Zellis Group adheres to professional auditing standards and codes of practice when conducting these activities.



Continual improvement

Always learning and leveraging improvement opportunities

In line with our Zellis Group values, we are committed to be 'always learning.' This extends from the development of new technologies to lessons learned in the delivery of our services. We encourage our suppliers to be inquisitive and explore opportunities to improve, to design better ways of working and develop new ideas for product and service innovation. We encourage suppliers develop and document a continual improvement process that is shared with us, so that we can focus on making experiences better for everyone.

Speak up and whistleblowing

Whistleblowing is an essential conduct mechanism to enable all employees to be heard if they identify a cause for concern. We expect our suppliers to implement adequate speak up and whistleblowing provisions in compliance with applicable directives and law. We want employees to feel comfortable with reporting concerns or potentially unlawful activities in the workplace. Suppliers should make provisions to ensure anonymity, ensure communications are treated in a confidential manner and that cases are investigated to satisfactory resolution. We expect suppliers to share the context of any cases relating directly or indirectly to Zellis Group and / or our customers so that we can take the necessary precautions and remedial measures.

Contact List

- Zellis Group General Counsel and Company Secretary Chris.Fox@zellis.com
- Group Risk and Compliance Integration Director Neville.Cotton@zellis.com
- Chief Information Security Officer (CISO) at Russ.Fray@zellis.com
- Data Protection Officer (DPO) at GroupDPO@zellis.com
- Group Money Laundering Reporting Officer (MLRO) at GroupMLRO@zellis.com

