Supplier Code of Conduct

1. Introduction

At EML our vision is to be recognised as a world leading payments company offering our customers a feature rich, fully embedded payment solution via a simple, single touchpoint. In keeping with this vision, we recognise the importance of managing our supply chain to ensure the goods and services we purchase are provided to us in a manner that respects fundamental human rights, is consistent with our Code of Conduct, and recognises our responsibility to manage the environmental impact of our operations.

In developing this standard, we have benchmarked it to leading international standards such as the United Nations Universal Declaration of Human Rights (**UDHR**) and United Nations Global Compact's (**UNGC**) core values on human rights, labour standards, the environment and anti-corruption and various other leading-edge peer programs in various industries.

2. Purpose

This Supplier Code of Conduct (**Code**) applies to all suppliers of goods and services to EML and its subsidiary companies (**the Group**). We expect that our suppliers, whether directly or through their supply chain, conduct themselves in accordance with the principles and standards in this Code and implement suitable management systems and processes. We also expect that our suppliers provide influence and guidance within their own supply chain to adopt the principles and standards in this Code.

3. Compliance with the law

Suppliers are required to operate in compliance with all applicable local/regional laws and regulations, including but not limited to those relating to modern slavery, labour, health and safety, and the environment.

The expectations in this Code are not intended to alter or override suppliers' legal, regulatory, and contractual obligations and Suppliers' contracts may contain obligations or requirements that are not set out in, or are additional to, this Code.

4. Ethics and Business Conduct

EML expects suppliers and their agents to behave ethically and with integrity in all business transactions.

- Any form of corruption, extortion or embezzlement is strictly prohibited.
- Bribes and other means of obtaining undue or improper advantage are not to be offered or accepted.
- Suppliers should observe local custom with respect to gifts, and to not offer or receive gifts that could affect, or be perceived to affect, the outcome of business transactions or are not otherwise reasonable and justified.
- Suppliers should ensure business transactions are made in a transparent and fair manner.
- Suppliers should take all reasonable steps to manage conflicts of interest, whether perceived, potential, or real.
- Financial records must be kept in accordance with all applicable accounting practices, legal and regulatory requirements.
- Suppliers will conduct their business in line with fair competition and in accordance with all applicable competition laws.
- Suppliers will not publicly disclose their supply association with EML or the use of EML name or brand elements without EML's prior written consent.
- EML's intellectual property rights are to be respected.
- EML is committed to dealing with its suppliers fairly, ethically, and transparently, including providing clear communication and timely response to supplier inquiries.
- Suppliers will comply with all applicable laws and regulations relating to anti-money laundering, counter-terrorist financing, sanctions, trade restrictions and the prevention of financial crime, and maintain appropriate controls to prevent their involvement in money laundering, terrorist financing, fraud or other illicit activity.

5. Modern Slavery, Human Rights and Labour Standards

Modern Slavery

Modern slavery can take various forms including, slavery, servitude, forced and compulsory labour and human trafficking. EML is committed to utilising ethical suppliers and ensuring that modern slavery risks in EML's supply chain are identified and that steps are taken to address these risks. EML expects suppliers to comply with all applicable modern slavery laws and implement appropriate due diligence policies and procedures to identify, assess and mitigate modern slavery risks within the business operations and supply chains.

Human Rights

EML respects fundamental human rights. As set out in EML's Group Human Rights and Modern Slavery Policy and in accordance with the United Nations' Guiding Principles (UNGP) on business and Human Rights and the UDHR, suppliers are expected to recognise and be committed to upholding the human rights of workers. Suppliers should implement appropriate processes to identify, assess and mitigate and monitor actual and potential human rights impacts within their operations and supply chains. Where adverse human rights impacts are identified, suppliers should take reasonable steps to address and remediate those impacts.Forced Labour and Inhuman Treatment

- Suppliers will not use any forced, bonded, or indentured labour or involuntary prison labour.
- Suppliers will not engage in, or condone, inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion of workers.
- Suppliers will ensure their activities do not contribute toward human exploitation, including human trafficking.
- Suppliers must not source materials, components or services that are prohibited under applicable forced labour laws or trade restrictions and must maintain sufficient supply chain transparency and traceability to demonstrate compliance

Child Labour

- Suppliers must not engage in practices relating to, or subcontract with organisations, who employ child labour.

Wages, Benefits and Conditions

- Suppliers will compensate workers in compliance with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Working hours are not to exceed the legally accepted maximum set by local laws.
- Suppliers are responsible for maintaining the workplace and any living quarters use to house workers in a hygienic and safe manner.

Diversity

EML recognises that people are its most important asset and is committed to the maintenance and promotion of workplace diversity. Suppliers are expected to respect the diversity of their workforce and others with whom they interact.

EML expects all suppliers will commit to providing an equal opportunity workforce that is non-discriminatory, diverse, inclusive, and respectful, and free from harassment and abuse.

6. Environment

EML is committed to minimising the impact of its operations, and those of its suppliers, on the environment and expects suppliers to meet all applicable environmental protection laws, regulations, and standards. Suppliers are expected to actively manage the environmental impact of their operations.

7. Monitoring and Compliance

Suppliers are expected to develop appropriate documentation to demonstrate that they share the values, principles and standards addressed in this Code and with respect to all legal requirements.

EML reserves the right to:

- Review such documentation; and
- Perform any assessments or reviews on supplier practices as part of a continuous improvement plan.
- EML may also engage independent third parties to conduct audits or assessments of supplier compliance with this Code.

Suppliers must monitor their compliance with this Code, notify EML of any significant breaches, allegations of non- compliance or investigation into non-compliance by authorities.

Suppliers are expected to take reasonable steps to address, remedy and prevent reoccurrence of any breach of this Code.

EML's standard payment terms are 30 days from receipt of a valid invoice, unless otherwise agreed in writing.

EML reserves the right to disqualify any potential supplier or discontinue business relationships with any current supplier which has failed to comply with this Code.

8. Speaking Up

Suppliers can raise concerns about any actual or suspected breach of this Code:

- Directly with their supplier relationship point of contact.
- Via EML's external and independent whistleblower provider Your Call Whistleblowing Solutions (**Your Call**).

Concerns can be raised, or disclosures made, anonymously to Your Call via their telephone hotline or online 24/7 via the Your Call website https://www.YourCall.com.au/report. Please refer to the Group Whistleblower Policy for further contact details.

9. Data Privacy and Confidentiality

Suppliers must protect confidential information and personal data obtained through their relationship with EML and comply with all applicable data protection and privacy laws.

Suppliers must maintain appropriate information security controls designed to protect EML information, systems and data against unauthorised access, loss, misuse, disclosure or cyber threats and promptly notify EML of any actual or suspected security incidents affecting EML information.

10.Policy Ownership

This policy is owned by the Chief Risk and Compliance Officer (CRCO) of EML Payments Limited

Last reviewed: 31 July 2026
Approved by the board