

## Achievers' Modern Slavery and Human Trafficking Statement

Last Updated: October 17, 2022

This Statement is made in accordance with the *Modern Slavery Act 2015* and provided by Achievers Corp. and its subsidiaries, including Achievers Solutions UK Limited (collectively, referred to as “**Achievers**”, “**we**”, “**us**” or “**our**” in this Statement). Achievers, until October 2020, was part of the Blackhawk Group of companies and covered by the Blackhawk Network Holdings, Inc. modern slavery statement and strategy. On October 2<sup>nd</sup>, 2020, Achievers became an independent company in its own right. In September 2021, Achievers posted its first Modern Slavery and Human Trafficking statement.

### Background

Achievers' mission is to change the way the world works by offering employee voice and recognition software solutions to bring organizations' values and strategy to life by activating employee participation and accelerating a culture of performance. Achievers leverages the science behind behavioral change, so our customer's people and its organization can experience sustainable, data-driven business results. Our science powered, mobile-first smart technology provides high frequency recognition and supplementary reward functionality to our customers, including peer-to-peer recognition, online redemption, employee surveys and feedback, and various administrative and communication tools designed to help activate employee participation, foster culture, and accelerate performance.

Achievers takes the risks of modern slavery occurring in its own business and supply chains very seriously. We believe that many of our existing processes and practices already reduce the risks in both our own business and our supply chains.

### Our Supply Chain

Our core suppliers include third-party technology suppliers required to support our software platform. While our supply chain is generally understood to be low risk for modern slavery and human trafficking activities, we are committed to monitoring our supply chain and will determine appropriate steps in the event that we determine there may be a higher risk of slavery or human trafficking.

### Supplier Engagement

Achievers strives to select suppliers that maintain high ethical standards in the conduct of their business. Suppliers are required to adhere to all applicable laws and regulations. To ensure alignment between our values and ethics and those of our suppliers, Achievers requests contractual commitments from its Suppliers, including compliance with applicable laws, specifically Modern Slavery, Anti-Corruption, and Anti-Bribery.

In late 2021, we launched the Achievers Corporate Social Responsibility (CSR) collective, a joint taskforce of internal stakeholders faced with identifying and executing on our purposeful CSR initiatives. We are currently undergoing a phased approach in updating our supplier selection and onboarding process. As of May 2022, Achievers have (i) requested its existing reward fulfillment suppliers to acknowledge and comply with the Achievers Supplier Code of Conduct; (ii) request all new trade and fulfillment suppliers to acknowledge and comply with the Achievers Supplier Code of Conduct. In early 2023, Achievers will be working to implement processes to request all new suppliers to identify measures they have in place to combat modern slavery and human trafficking, where such information will be documented and used as part of our assessment and selection process.

### Our People

It is the People of Achievers who have built our culture where we “Own the Outcome”, invest in our relationships and take great pride in our accomplishments. This culture, as well as the reputation we have built with our partners and customers, stands on the pillars of integrity and mutual trust. That is why we have rooted our Code of Business Conduct & Ethics in Our Values to guide each of us in making the right decisions.

Our Code of Business Conduct & Ethics requires all our employees to do business responsibly, ethically, and honestly, as well as comply with all legal and regulatory requirements, including applicable modern slavery and

human trafficking laws. All Achievers employees, including consultants and subcontractors we engage, are required to conduct their activities in accordance with our Code of Business Conduct and Ethics.

## Compliance Training and Policies

We are committed to ensure all employees are trained on any legislative requirements, which impact our business. All employees are required to complete a set of relevant training courses upon their employment onboarding with Achievers and annually thereafter, which includes training specific to modern slavery and human trafficking. The contents of training courses are reviewed on an annual basis to ensure they are up to date.

Achievers' Compliance Policies are included in our training courses and centrally available to all employees through our intranet site. Any changes or updates to such Compliance Policies are communicated to all employees.

## Reporting

We encourage all employees to speak up and share any concerns regarding the violation of the Achievers Code of Business Conduct & Ethics or any of our Compliance Policies. Employees and third parties may raise concerns anonymously through our Compliance and Ethics Help Line or website reporting portal.

## Future Commitments

At Achievers, we are committed to implementing and improving upon practices to combat modern slavery and human trafficking in our supply chains and throughout our business. As such, in 2023, we are committed to:

- Requesting that all new suppliers we onboard comply with our Supplier Code of Conduct, or demonstrate that they have their own code of conduct that meets or exceeds the standards set out by Achievers, and use best efforts to ensure that its downstream suppliers comply with the principles set out in our Code of Conduct;
- Updating our supplier selection process to include that the supplier demonstrate compliance with applicable Modern Slavery and Human Trafficking laws; and
- Review the effectiveness of the steps being taken, including conducting periodic audits of suppliers and their terms to assess compliance with Modern Slavery and Human Trafficking laws.

## Board Approval

This Statement has been approved by the Board of Directors of Achievers Solutions UK Limited and will be reviewed and updated as necessary on an annual basis.



**Jeff Cates**  
Director, Achievers Solutions UK Ltd.



**Steven Malduca**  
Director, Achievers Solutions UK Ltd.