



Human Rights and Modern Slavery Policy

Pay Later Group Limited

June 2021

Fly Now Pay Later's position on human rights and modern slavery

Fly Now Pay Later is committed to supporting and respecting human rights. As a global business, we recognise the responsibility we have in upholding human rights principles, and the significance of the role we play in protecting the most vulnerable members of the communities we work in and serve.

Purpose and scope

The purpose of this policy is to:

- set out Fly Now Pay Later's approach to human rights and modern slavery issues, and core principles that we uphold; and
- set out employee responsibilities to monitor and report suspected human rights issues and provide information and guidance on how to deal with such issues.

This policy applies to Fly Now Pay Later, all entities controlled by Fly Now Pay Later and all directors, officers and employees (including temporary or contract staff) of Fly Now Pay Later.

Fly Now Pay Later expects that those who perform services for or on behalf of Fly Now Pay Later will comply with the principles and standards detailed in this policy. This includes agents, contractors, consultants, advisors and joint venture partners.

Principles

Fly Now Pay Later's approach to human rights is informed and governed by our values and code of conduct, and is underpinned by the United Nations' Universal Declaration of Human Rights and the ten principles of the UN Global Compact.

We are committed to respecting human rights, and ensuring that our people and partners comply with all laws that seek to preserve those rights in each of the countries in which we operate. We do this by:

- Respecting internationally recognised human rights principles as set out in the Universal Declaration of Human Rights and the 10 UN Global Compact Principles, and ensuring that these principles are understood, respected and upheld across our organisation, primarily through training and education.
- Treating our employees with respect, and providing a safe, fair, and non-discriminatory work environment that is free from harassment, bullying or victimisation and which respects the right of freedom of association.
- Promoting diversity and inclusion with our employees, respecting the diversity of others and where identified, addressing exclusion.
- Closely monitoring and complying with all applicable laws and regulations in communities and jurisdictions in which we operate (and where differences exist between our own standards and local customs, rules or regulations, applying the higher standard).
- Not tolerating or supporting the use of child labour, forced, bonded or compulsory labour and any other form of modern slavery.
- Considering the risk of our involvement in negative impacts on human rights through both our own activities and business relationships and, where risk is identified, ensuring that defined internal procedures are followed.

- Engaging meaningfully with our stakeholders with respect for their human rights in any interactions.

Forms of modern slavery

Modern slavery is a significant global issue which can occur anywhere, not just in developing countries and economies. Modern Slavery takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain, including:

- Forced Labour (including child labour) – involves coercion, whether by direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of penalty and for which the person does not willingly agree to;
- Debt Bondage – victims are forced to work to pay off debts that realistically they may never be able to repay. Low wages and increased debts can mean not only that they cannot ever hope to pay off the loan, but the debt may be passed down to their children;
- Sexual Exploitation – victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Whilst women and children make up the majority of victims, men can also be affected. Adults are coerced often under the threat of force, or another penalty;
- Criminal Exploitation – victims are forced into crimes such as cannabis cultivation or pick pocketing against their will;
- Domestic Servitude – victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work;
- Human Trafficking – the arrangement or facilitation of the travel of another person, either across borders or within a single country, with a view to that person's sexual or non-sexual exploitation.

Fly Now Pay Later is committed to preventing and addressing our involvement in modern slavery, and eliminating the risk of modern slavery within our business, our people, or any other business relationships. We do this by training our people to identify and report suspected human rights issues, and requiring that the third parties we work with have their own policies and procedures in place to adequately identify and prevent human rights violations or modern slavery issues.

Modern slavery measures

In order to achieve the principles and commitments set out in this policy, Fly Now Pay Later has taken steps to assess the modern slavery risks that exist in its supply chain. We have implemented risk-based measures and processes to require any third party suppliers we work with are compliant with the principles in this policy, and with their own modern slavery and human rights obligations. These measures include, for example, targeted onboarding questionnaires, enhanced due diligence procedures, and periodic supply chain reviews. We also require that our third party suppliers agree to the principles set out in this policy by including contractual terms in our supplier agreements to that effect, to further mitigate these risks. Where we identify risks or issues with potential or current third party suppliers, appropriate measures are taken to ensure outcomes are consistent with this policy. These actions will be reviewed and refined on an annual basis, and a summary of the key actions we've taken in relation to modern slavery will be reported in our adhoc 'Modern Slavery Statement'.

Breaches and Reporting

Fly Now Pay Later strives to achieve and maintain an open culture that values and encourages integrity and accountability. All Fly Now Pay Later employees, suppliers and stakeholders are encouraged to report any perceived instances of unethical or illegal conduct - including in relation to human rights - to their line manager. Where concerns are substantiated following investigation, Fly Now Pay Later will take appropriate action. Employees whose behaviour is found to be at odds with the principles set out in this

policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct Fly Now Pay Later reserves the right to terminate any relationship with a supplier or business partner who breaches this policy. The Board, through its Audit, Risk and Compliance Committee, maintains oversight of all activities relating to compliance, including human rights, to ensure that our actions continue to be defined by our values.

Training

Training on this policy forms part of the induction process for all Fly Now Pay Later employees, with focused training provided to business areas with greater exposure to supply chain risks, such as Procurement and Legal.

Review

The Executive Committee will monitor the implementation of this policy and will review its effectiveness, including that internal control systems and procedures are periodically audited to ensure they are effective in minimising the risk of non-compliance with this policy. This policy is subject to annual review and any material amendments must be approved by the Fly Now Pay Later Board.

Version Control

Version	June 2021
Policy owner	Executive Committee
Review cycle	Periodically