

**Blackhawk Network Holdings, Inc.**  
**Modern Slavery and Human Trafficking Statement**

This statement is made pursuant to the Modern Slavery Act 2015 (UK), the Modern Slavery Act 2018 (Cth) (Australia), and the Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9) (Canada).

We are committed to operating our business lawfully and ethically and only working with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking, and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection, and staff inclusion and diversity.

**Our Company, Solutions, and Structure**

Blackhawk Network Holdings, Inc. (Delaware, USA) (“BHN”) is a privately-owned, US company headquartered in Pleasanton, California with over 5,000 employees worldwide and operations in 19 countries. This statement covers several wholly owned BHN subsidiaries that are listed at the end of the statement. BHN’s business is at the intersection of financial services and technology. We deliver branded payment programs to help meet today’s most challenging business objectives. Our solutions fall into three groups: Rewards and Incentives, Gift Cards and eGifts, and Payments.

- Our Rewards and Incentives solutions are a set of system platforms that enable our business clients to leverage our prepaid products and gift cards to improve customer acquisition and retention, build brand loyalty, and motivate team members.
- Our Gift Card Solutions help companies expand their retail offerings through gift cards or offer their own gift cards to improve branding and marketing. We help ensure the success of our partners’ gift card programs through various services including design, distribution, fulfilment, and marketing.
- Our Payments Solutions provide a full suite of technology services to simplify digital payments across a range of use cases.

BHN has multiple wholly owned subsidiaries subject to modern slavery laws. While we have operations across multiple locations and business units, our policies and practices governing modern slavery concerns are largely centralized. Our head of Global Operations oversees all operations internationally and also supervises the company’s Environmental, Social, Governance (ESG) program.

**Our Supply Chains**

BHN’s supply chain operations relate primarily to:

- Production and fulfilment of physical gift cards
- Physical gift card fixtures and displays
- Technology partners that support back-end payment processing
- Suppliers that directly support our day-to-day administrative functions

Due to the nature of our business and that of our supply chain, we have assessed that there is very low risk of modern slavery and human trafficking. Manufacturing of physical gift cards and related products (such as gift card carriers and fixtures) is performed in 12 countries. We reviewed the most recent Walk Free international human rights group's Global Slavery Index, which estimates the prevalence of modern slavery across 160 countries. Over 95% of the value of gift cards sold in BHN's network are <sup>1(00)</sup> digital. Finally, the proportion of BHN's products that are 100% digital has increased by more than 10% over the past five years, meaning that they are digital goods or services that do not have a manufactured component (outside of the technology and servers needed to enable them), which further reduces the risk of modern slavery.

### **Our Policies**

We have a Code of Business Conduct and Ethics. This Code serves to guide the actions of our employees consistent with BHN's values. The Code emphasizes our commitment to doing business responsibly, ethically, and honestly. This is about more than staying out of the headlines and avoiding legal issues – it's about fostering a workplace that values trust, quality, and fairness within the company, and with our customers, suppliers, and business partners. The Code discusses BHN's commitment to fair employment practices and health and safety in the workplace. Our Code outlines principles to help employees do the right thing and encourages employees to speak up and report any Code violations that they see or suspect.

We also have documented and published a Supplier Code of Conduct that details what we expect from our suppliers with regards to:

- Business Practices and Ethics
- Labour Practices and Human Rights
- Environmental Protection
- Compliance and Reporting

Our suppliers are required to agree to our Supplier Code of Conduct and to report any potential risks in their supply chains to us. We encourage our suppliers to require their subcontractors to acknowledge and implement equivalent standards of conduct.

We also have a formal Supplier Risk Management Program for assessing the risks and controls of our suppliers. Through this process, we perform due diligence on our suppliers to address the risks of modern slavery and human trafficking. Suppliers in higher-risk countries or industries for modern slavery undergo additional assessments to confirm that there are adequate policies in place to mitigate the risk. If issues are identified, our Program includes escalation and remediation procedures to help ensure that we do not support suppliers that exhibit modern slavery risks. As of 2026, fewer than 4% of our suppliers are in industries that we consider higher-risk for modern slavery. We have not identified forced labor or child labor in our supply chains to date. Our contracts with suppliers all have

---

<sup>1</sup> Countries with estimated prevalence of modern slavery of 3.5 per 1,000 population, or lower, based on the most recent Walk Free International Global Slavery Index (2023).

clauses which require them to comply with applicable laws, including labor and employment laws. Once onboarded, we conduct regular business reviews with our major suppliers. During these reviews, we discuss quality, cost controls, and business practices to confirm that our suppliers are meeting our expectations.

### **Our Training**

We train all employees in relevant legislative requirements which impact our business. We regularly communicate our company policies through our intranet and roll out mandatory training courses regularly to relevant employees, which includes training specific to Modern Slavery and Human Trafficking. The training course helps BHN's staff recognize what modern slavery looks like today and where and how it is more likely to happen.

### **Speak Up Hotline/Site**

We have a whistle-blower policy and an independently operated, publicly available hotline that we communicate with all staff and suppliers, which anyone can use to raise grievances. We call this our "Speak Up Hotline" to encourage anyone to raise concerns, anonymously if they wish. We have a non-retaliation policy that prohibits any adverse action or victimization of anyone who makes a good-faith report. All reports are thoroughly investigated, and outcomes are reviewed by a committee to ensure that they are addressed in a timely manner and appropriately.

### **Commitments**

To date, we have not identified any forced labor or child labor in our activities and supply chains, and therefore have not needed to take measures to remediate loss of income to vulnerable families resulting from steps to eliminate such practices. We monitor key performance indicators (KPIs) on a regular basis to measure our actions addressing the risks of modern slavery practices and our program effectiveness. These include, for example: percentage of suppliers in an industry deemed higher-risk for modern slavery; percentage of suppliers completing a risk assessment questionnaire; percentage of suppliers requiring remediation of modern slavery practices or oversight; completion rates for modern slavery awareness training, and number of speak-up or grievance reports raised that are related to modern slavery issues.

As part of our broader Environmental, Social, Governance (ESG) efforts, we have started assessing the environmental impacts of our top suppliers and tracking diverse business ownership where applicable.

### **Approval**

This statement relates to Blackhawk Network Holdings, Inc. (and its subsidiaries, including but not limited to the following: Blackhawk Network EMEA Limited, Blackhawk Network (Australia) Pty Ltd, Blackhawk Network (Canada) Ltd, Cyclescheme Limited, GVS Prepaid Limited, and The Gift Voucher Shop Limited.

This statement has been approved by Blackhawk Network Holdings, Inc. and the Board of Directors of Blackhawk Network (Australia) Pty Ltd on behalf of the Australian MSA reporting entities listed in Appendix I.

This Statement was approved by the board of Blackhawk Network EMEA Limited on behalf of the UK MSA reporting entities and will be reviewed and updated as necessary on an annual basis.

To prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control. The Boards of each reporting entity have approved this Statement.

Dated: 5/5/2026

Micki Wainhouse, Interim General Counsel

Signed by:



F763F55E02D3409...

I have the authority to bind 'Blackhawk Network (Canada) Ltd.'

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of General Counsel, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity [or entities] listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

### Appendix I – Australian Entity Details

Blackhawk Network (Australia) Pty Ltd subsidiaries include:

- Digital Glue Australia Pty Ltd
- Digital Glue International Pty Ltd
- Digital Glue Pty Ltd
- Edge Loyalty Systems Pty Ltd.

### Appendix II – Canadian Entity Details

Blackhawk Network (Canada) Ltd. (2011573108)

Entity Structure: Corporation

Formed In: Alberta, Canada

Location: Toronto, Ontario

Subsidiaries: Main Street Offers Inc. (5008120)

Financial reporting year: 2024

Entity categorization according to the Act:

- Canadian business presence
  - Has a place of business in Canada
  - Does business in Canada
  - Has assets in Canada
- Meets size-related thresholds
  - Has at least \$20 million in assets for at least one of its two most recent financial years
  - Has generated at least \$40 million in revenue for at least one of its two most recent financial years

Sector/industry:

- Finance and insurance
- Professional, scientific and technical services