



9 Spokes International Limited
Environmental, Social &
Corporate Governance
Policy

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1 Introduction

9 Spokes International Limited (9Spokes) and its subsidiaries (as applicable) (together Group) recognise it is of the utmost importance to have a culture of acting lawfully, ethically and responsibly in all aspects of doing business and as a good corporate citizen.

The Group policies listed in clause 5.1 below address these values and behaviours.

The upholding of such a culture is essential to protect the reputation and standing of the company in the community and with key stakeholders such as bank channel customers, employees, suppliers and regulators, and to build long-term sustainable value for its security holders.

2 Scope

- 2.1. This policy applies to all entities, directors, employees and persons managed by the Group in all areas of operation. It applies to all business units, including corporate, marketing and operations.

3 Purpose

- 3.1. Group recognises that how an entity manages environmental and social risks can affect its ability to create long-term value for security holders.
- 3.2. Upholding a culture which values reputation, integrity and accountability, and which values environmental and human resources is essential to building sustainable value for its security holders and to being a good corporate citizen.

4 Environmental risks

- 4.1. As a Software-as-a Service (SaaS) or Platform-as-a Service business, Group has no material exposure to environmental risks, including climate change risk.

5 Social risks

- 5.1. Social risks are addressed in accordance with the following policy framework (linked to the relevant corporate governance policies on the 9Spokes website):
 - i. Code of Conduct
 - ii. Anti-Bribery Policy
 - iii. Whistleblower Policy
 - iv. Diversity Policy
 - v. Corporate Governance statement

6 Reporting

- 6.1. Annually an ESG report will be published by the company confirming that it has the above policies in place, and that they are being adhered to. It will also address such matters as:
 - i. Board diversity (gender diversity and number of independent directors);
 - ii. Gender diversity in the workplace;
 - iii. Employee health and safety and fair treatment of employees;
 - iv. Employee turnover/attrition rate for the previous financial year;
 - v. Confirming that 9Spokes has appropriate contracts in place for casual employees and volunteers;
 - vi. Workplace lost time incidents (LTIs), to the extent this is considered appropriate; and

- vii. Confirming its carbon emissions are negligible/minimal.

7 External reference

- 7.1. This Policy and the associated procedures have been drafted taking into account ASX Corporate Governance Principles and Recommendations, including Principle 3 and Recommendations 3.1 to 3.4 and Recommendation 7.4.