

## Code of Conduct

The behaviour, decisions and actions of our people is important to us. This Code of Conduct sets out our expectations and will help you to understand the values and principles that we want to promote.

It applies to all **employees** and **contractors** of Moonpig Group plc and its subsidiaries (which includes Moonpig.com Limited, Cards Holdco Limited, Greetz B.V., Venspro B.V., Full Colour B.V., Greetz Base B.V. and Horizon Bidco B.V.).

It does not contain employment conditions or engagement terms, does not form part of your employment contract or terms of engagement for those in the United Kingdom, and we may amend it at any time.

Any employee who breaches this policy may face action under our Disciplinary policy. In case any contractor breaches this policy, this may result in termination of their contract terminated, potentially with immediate effect.

### What are our values?

Our values lead everything we do:

- We believe in each other.
- We shake things up.
- We make magic happen.
- We win together.

We can only truly live our values if we work together in a way that encourages pride, respect, accountability and fairness. This code explains the behaviours we want to see and where you can find more information or support if you need it. We encourage you to read and understand all of the policies and procedures that are relevant to your role; you can find these on the People Portal. If you have any questions, speak to your manager or the local People Team.

### Being present

Being present is the first step in doing a great job. When you are working, we expect you to be engaged and present; being contactable, communicating with your colleagues, keeping your manager up to date and being a proactive member of the team. This applies whether you are working in the office, at home or another location.

### Dress for your Day

We're happy for you to dress appropriately for the day ahead. If you have a big day, you might need to wear something more formal, like a suit or a dress. Other days will be more low-key. Most people will have a preference; we really don't mind as long as its professional and suitable for what you're doing that day - remember that you're representing us. We respect cultural and religious requirements to wear certain items; speak to the local People Team if you're unsure.

## Strong relationships

We don't have any issue with personal relationships or close friendships between colleagues; we know it happens. All we ask is that you act professionally when in work and don't do anything that distracts from us getting the job done. If you have any relationships or connections outside work that might reasonably conflict with your interests working for us, speak to your manager or the local People Team. We'll look at the situation and decide on an appropriate way forward. If you're an employee, you need to get written approval from us before taking on any other paid or unpaid work for other employers or organisations.

## Respecting our workplace

You must treat all company property with respect and care. You must also comply with any procedures we have in place around reducing the environmental impact of our business and working sustainably.

Working in a healthy and safe way is essential; you must follow our Health and Safety policy at all times. We take your security extremely seriously and operate CCTV on our premises. If you invite visitors to the office, you must sign them in and out at reception, stay with them at all times and act quickly if their behaviour becomes threatening or inappropriate.

Our workplace is completely smoke-free, including vaping. If you do smoke or vape, you shouldn't take excessive breaks for this reason and should only use designated smoking areas outside the premises. Be mindful of the fact that smoke can cling to your clothing and act with respect when you're working closely with colleagues.

## Acting with integrity

We want to act responsibly and with integrity at all times, taking pride in the work we are doing. This means that we're 100% anti:

- **Fraud** – fraud is gaining some advantage for yourself/others or causing loss or exposure to risk through false representation, failing to disclose information or abuse of position. We have a zero-tolerance approach to fraudulent activity and every case of attempted or suspected fraud should be reported for investigation.
- **Bribery and Corruption** – you must act ethically and in accordance with our Bribery and Corruption policy at all times. This means not giving or receiving any type of bribe and reporting any suspected issues for investigation.
- **Modern Slavery** – we want to make sure that our business and supply chains are free from any type of slavery or coercive activity. The responsibility is on all of us to do this by looking out for warning signs and speaking up if we've got any concerns, no matter how small.
- **Discrimination, bullying and harassment** – we all deserve to be treated with respect and we stand against all and any forms of discrimination, bullying and harassment, whatever the reason.

If you suspect any of the above activities may have taken place or are likely to happen, speak to your manager as soon as possible. In some cases, it might be more appropriate to report concerns to the

local People Team or under our Grievance or Whistleblowing policies. Any genuine suspicions of fraud, bribery and corruption reported will be escalated to the Chief Financial Officer immediately.

Any employee who commits any of these activities may face action under our Disciplinary policy. In case any contractor breaches this policy, this may result in termination of their contract terminated, potentially with immediate effect. Depending on the circumstances, the matter may also be reported to the police.

### **Protecting our brand**

You shouldn't make any media or public statements, in any form, about our business unless you have express, written permission. Any media enquiries should be sent to the local Head of PR in the first instance.

Personal use of social media won't be an issue unless it interferes with your working responsibilities or relationships, or has the potential to damage our business or brand.

You mustn't engage in any social media or online communications that could bring our business or brand into disrepute, even indirectly. You mustn't use social media to defame or criticise us, our people or any third party, to harass, bully or unlawfully discriminate or to make false or misleading statements. You also shouldn't express opinions on our behalf via social media, unless you've been expressly authorised to do so. You mustn't post comments about sensitive business-related topics, like our performance, business strategy or do anything to jeopardise our trade secrets, confidential information and intellectual property. You mustn't include our logos or other trademarks in any social media posts or online, unless it's part of your role.

You should make it clear in personal social media postings that you're speaking on your own behalf. But you still need to be respectful to others and aware that you're personally responsible for all communications which are published on the internet. If you disclose your association with us on your profile or in any social media postings, you must say that your views don't represent those of the company (unless you're authorised to speak on our behalf). You also need to make sure your profile and any content you post are consistent with the professional image you present to clients and colleagues. If you are in any doubt, don't post. You'll be required to remove any content that breaches these rules and may face action under our Disciplinary policy.

If you see any social media or internet content that reflects poorly on us, you should report it to your manager or the local People Team.

### **Protecting our information**

We are an information and data led business and you are likely to have access to confidential information and/or personal data when carrying out your role. You must comply with your contractual responsibilities in relation to confidential information and data protection, even after the end of our working relationship. You must also comply with our Data Protection and IT and Communications policies at all times, whether you are working on our premises, at home or from another location.

APPROVED BY THE BOARD OF MOONPIG GROUP PLC ON 10 JANUARY 2021