

Whistleblowing Policy

March 2023



Whistleblowing Policy

We're committed to conducting our business with honesty and integrity at all times. We expect our people to maintain high standards and speak out against suspected wrongdoing. You have an important part to play in making sure we deliver on our commitment.

This policy applies to all employees, interns, trainees, volunteers, self-employed workers, agency workers and contractors of Moonpig Group plc and its subsidiaries.

In case of a conflict between this policy and any local laws or regulations, including rules of professional conduct, the local laws and regulations will prevail. 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.

What is whistleblowing?

Whistleblowing is the reporting of information which relates to reasonably suspected wrongdoing or dangers in any of our locations. It can include things like:

- criminal activity;
- breach of legal, professional or regulatory obligations;
- dangers to the health or safety of any person;
- damage to the environment;
- danger to the proper functioning of the public sector or an enterprise as a result of an improper act or omission;
- wrongdoing, such as fraud, bribery and corruption or modern slavery;
- unethical or dishonest behaviour;
- inappropriate marketing or selling behaviours;
- incorrect reporting;
- unauthorised disclosure of confidential information; or
- facilitation of tax evasion, financial fraud or financial mismanagement.

If you have a concern where you reasonably believe wrongdoing has taken place, or is likely to take place in our business, you can report it to us following the procedure below. This policy is not for complaints relating to your own personal circumstances, such as the way you've been treated at work. You should use the Grievance policy for that type of complaint.

How do I raise a concern?

In most cases you'll be able to raise any concerns with your manager. If you don't feel that's appropriate for any reason or it does not resolve the matter, speak to the Whistleblowing Officer or contact the Whistleblowing Hotline. If you are unsure whether something is covered by this policy then you can follow the same process to get advice.

The Whistleblowing Officer is the Company Secretary, who can be contacted by emailing company-secretary@moonpig.com.

What happens if I contact the Whistleblowing Hotline?

We operate a confidential reporting service run by an external service.

The Whistleblowing Hotline is +44 (0)800 915 1571 in the UK or + 31 800 7233 2255 in the Netherlands or via <http://www.safecall.co.uk/report>. The Whistleblowing Hotline is provided by a company called Safecall (<https://www.safecall.co.uk/>).

When you contact Safecall they will speak to you about your concerns. They will not record the conversation and they will only disclose your identity to us if you give them permission. They will write a report on your concerns and provide it to the Whistleblowing Officer who will decide what to do next. Safecall can have a conversation with you in either English or Dutch.

Confidentiality

As far as we can, we try to keep whistleblowing issues confidential and only disclose details on a 'need to know basis'. We'll tell anyone involved in the process that they must keep the information confidential. If you want to raise your concern anonymously, we'll make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating. Upon your explicit request, however, the information will be treated confidentially, unless disclosure is required by law or necessary to address the reported concerns (in which case it shall only be disclosed in accordance with applicable law).

Can I make a report to a third party?

The aim of this policy is to provide a safe space for reporting, investigating and remedying any wrongdoing internally. In most cases we would expect the Whistleblowing Officer or the Whistleblowing Hotline to provide you with the right path to raise your concerns.

However, the law recognises that, in some circumstances, you may raise concerns directly with an external body, such as a regulator. This could be the case where you believe that this is the only appropriate course of action, such as in the event of immediate danger requiring direct action by a government body.

There are also alternative external reporting channels. For instance in the UK, you can contact Protect, an independent whistleblowing charity which operates a confidential advice line (www.protect-advice.org.uk). In the Netherlands, you can contact the 'House for Whistleblowers' for concerns that have already been reported internally (<https://www.huisvoorklokkenluiders.nl/>).

How will I be treated if I raise a concern?

Anyone who raises genuine concerns in good faith under this policy (even if they turn out to be mistaken) mustn't suffer any form of retaliation, detrimental treatment or victimisation. If you think this is happening, speak to your manager or the Whistleblowing Officer so that we can deal with the issue.

If we conclude that you've made false allegations maliciously, you may be subject to disciplinary action under our Disciplinary policy.

What happens when I raise a concern?

The Company Secretary, as Whistleblowing Officer, is responsible for investigating all concerns raised directly with them as Whistleblowing Officer or via the Whistleblowing Hotline. All concerns will be investigated thoroughly and confidentially. Appropriate action will be taken, and where necessary the concern will be escalated to the Senior Independent Non-Executive Director. All concerns are reported to the Board of Moonpig Group plc via its Audit Committee.

Processing of personal data

When you raise a concern and when an investigation is carried out under this policy, this might result in the processing of your personal data. Your personal data will be processed in accordance with General Data Protection Regulation (GDPR), the Dutch implementation of the GDPR (Uitvoeringswet Algemene verordening gegevensbescherming) or the United Kingdom General Data Protection Regulation (as relevant) (whether processed by us or by Safecall). More information about this processing of your personal data can be found in our privacy statement in the People Portal. Greetz employees can find the privacy statement in their Personnel Handbook.

Policy approval and changes

The Board of Moonpig Group plc has overall responsibility for this policy and is responsible for overseeing the implementation and effectiveness.

The Whistleblowing Officer has day-to-day responsibility for this policy and giving guidance and advice to managers and other staff.

This latest version of the policy was approved by the Board of Moonpig Group plc on 29 March 2023 and is effective from that date.