

Modern Slavery Statement 2022 for Moonpig Group plc



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Introduction

Modern slavery, including all forms of slavery, servitude, forced and compulsory labour and human trafficking, is an abhorrent abuse of human rights.

Moonpig Group is committed to ensuring full respect for anyone working for us, in any capacity. We take a zero tolerance approach to modern slavery in our business operations and supply chains.

Our structure, business and supply chains

At Moonpig Group our purpose is to create better more personal connections between people that care about each other. At heart we are a technology platform but our customers know us as the leading online destination for greetings card, gifts, and flowers. We are an international group, comprising the Moonpig, Greetz, Red Letter Days and Buyagift brands.

Red Letter Days and Buyagift were acquired in July 2022 and are therefore outside of the scope of this statement. The Greetz brand operates in the Netherlands and is therefore likewise outside the scope of this statement.

All key outsourcers and logistics providers to our UK businesses are also based in the UK, albeit their supply chains are in some cases global. The main categories in our supply chain relate to:

- Technology services, primarily software as a service (“SaaS”) providers for our technology platform;
- Logistics and outbound shipping services;
- Paper and other materials used in the fabrication of greeting cards; or
- Gifts purchased for resale

Our policies and governance

The Board of Moonpig Group plc has overall responsibility for the Group’s approach to anti-slavery, whilst day-to-day responsibility sits with the Group Leadership Team. Slavery and human trafficking risks are managed through the Group’s “three lines of defence” risk management framework (as set out in the FY22 Annual Report and Accounts).

As a FTSE 350 constituent, the Group operates an internal audit programme. During the year ending 30 April 2023, we intend that the Group’s outsourced internal auditors will perform a review of internal controls relating to modern slavery and human trafficking and report their findings to the Audit Committee of the Board.

The Group has the following policies that are directly relevant to modern slavery and human trafficking:

- Anti-Slavery and Human Trafficking Policy. We intend to update the policy during the year ending 30 April 2023 to further broaden its remit.
- Supplier Code of Conduct. This is published on the Group's corporate website. During the year, we performed modern slavery and human trafficking assessments for newly-signed suppliers; moving forward, we intend to perform these assessments ahead of contract signature.
- Anti-Bribery and Anti-Corruption Policy.
- Whistle-blowing Policy: Our people and commercial partners have access to an external whistleblowing service to report any legal or ethical breaches, including those relating to modern slavery. All matters reported (including in relation to modern slavery) are brought to the attention of the Audit Committee.

Due diligence processes

We hire all people based on a thorough recruitment process that includes immigration checks to safeguard against trafficking and forced labour.

We require all key suppliers* to complete a modern slavery risk assurance questionnaire using an automated tool. This tool creates a risk map of our supply chain based on aspects such as industry, country of operation and the suppliers' own policies and processes (including staff training and approach to mapping modern slavery in their own supply chains). Higher risk suppliers are then contacted by our procurement team for further engagement which may include the identification of appropriate mitigation, agreement of action plans, supplier monitoring or where necessary contract termination.

We require first-tier suppliers to cascade our modern slavery standards through their own supply chains in accordance with our Supplier Code Of Conduct.

A Modern Slavery Schedule was drafted in 2021 which outlines expectations of suppliers in terms of due diligence procedures, reporting breaches and training. We negotiate to include anti-modern slavery clauses in our supplier contracts. Moving forward, we intend to assess modern slavery and human trafficking risks before signing contracts.

Risk assessment and management

As a technology platform, our main human trafficking risks relate to supply chains for physical products, with lower risks with our SaaS technology service providers. For our in-house printing and warehouse operations, we seek to mitigate risk of modern slavery through having rigorous recruitment and hiring processes in place.

Organisational effectiveness

We have introduced an automated tool which enables us to track progress against modern slavery risks in our supply chain. During the year ending 30 April 2023, we intend to develop metrics to measure and evaluate improvements in our approach to modern slavery and human trafficking.

Training and capacity building

We require all employees and contractors to complete annual online training so that they understand the risks of modern slavery and human trafficking both in our own operations and in our supply chain. A new training tool was implemented during the year to ensure that the programme remains relevant and engaging.

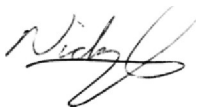
We also provide specific additional training to employees in our supply chain functions to equip them for the identification and prevention of modern slavery.

We communicated our Anti-Slavery and Human Trafficking Policy to all employees during the year.

Modern Slavery Statement 2022

This is Moonpig Group UK's second modern slavery statement. It is published in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act") and outlines our approach and work undertaken in relation to the financial year ended 30 April 2022. It is made on behalf of Moonpig Group plc, Cards Holdco Limited and Moonpig.com Limited.

This statement was approved by the Board of Directors of Moonpig Group plc on 25 October 2022.



Nickyl Raithatha
CEO and Director
25 October 2022

*Top suppliers identified by spend and modern slavery risk, representing over 80% of procurement spend annually