

Moonpig Group plc Supplier Code of Conduct

January 2022



Moonpig Group plc Supplier Code of Conduct

Introduction

At Moonpig our mission is to help people connect and create moments that matter. Our aim is to create a personalized experience that not only delivers for the receiver, but for the sender as well.

Our values lead everything we do:

- Be brave
- Raise the bar
- Keep it simple
- Think team

We can truly live our values if we work together with our suppliers in a way that encourages simplicity, ambition and teamwork. We expect our suppliers to work with us in ways that support our values and avoid any behaviours that are counter to those values.

Our main supply chains relate to

- Technology services for our eCommerce platform
- Logistics and outbound shipping services
- Paper and other materials used in the fabrication of greeting cards
- Gifts purchased for resale

In clearly stating our code of conduct our intention is to help suppliers understand the standards and behaviours are expected. Our code of conduct specifically addresses standards with regard to;

- Legal and regulatory compliance
- Prevention of financial crime
- Ethical people practices
- Business integrity and ethics
- Environmental responsibility
- Data Protection, Information Security and Business Continuity
- Health and Safety
- Whistleblowing

We recognise that a lot of our suppliers will have their own standards for the above. We expect all our suppliers and their supply chains to meet the requirements set out in legislation and regulation, as well as adherence to the requirements set out in this document, which reflects industry best practices. Changes to the Supplier Code of Conduct will be notified to all suppliers from time to time and all suppliers shall comply with new requirements that are relevant to their business, as soon as practicable.

Legal and Regulatory compliance

We expect all suppliers to confirm that their business practices are ethical, and they have a zero-tolerance approach to improper business conduct. This includes bribery, modern slavery and business activity with sanctioned entities.

Any prospective suppliers shall keep all pre-contractual data confidential and enter into a non-disclosure agreement if requested. They shall cooperate with all due diligence enquiries, including a supplier self-assessment and security review if necessary.

For current suppliers, we expect cooperation with any required security or due diligence review during the period of the contract and that suppliers will update their policies to comply with any change in regulation.

Our suppliers must comply with all laws and legislation concerning insider trading and should refrain from buying or selling Moonpig Group shares based on any inside information they directly or indirectly obtain in their role as supplier.

Ethical People Practices

Modern slavery is a crime and violation of fundamental human rights. Moonpig Group has a zero-tolerance approach to modern slavery.

We expect our suppliers to act ethically and with integrity and to include prohibitions against the use of forced labour, compulsory or trafficked labour, whether adults or children, as part of the contracting process with their own suppliers. We expect suppliers to encourage their employees, subcontractors, business partners and suppliers to raise any concerns about any issue of modern slavery or unethical people practices at the earliest possible stage, providing a safe means for whistleblowers to report.

Our Modern Slavery statement is published on our group site and can be found here <https://www.moonpig.group/site-services/modern-slavery-statement/>

We expect our suppliers to have their own terms of employment which complies with applicable legislation. There must not be any form of discrimination in the hiring process, or inequality of opportunity once in employment.

Moonpig is committed to promoting equal opportunities in employment and has zero tolerance to discrimination based on age, disability, gender identity, marital or civil partnership status, parental status, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. We expect our suppliers and their employees to not unlawfully conduct direct or indirect discrimination, harassment, or victimisation.

Business Integrity and Ethics

Moonpig takes a zero-tolerance approach to bribery and corruption and upholds all laws relevant to countering bribery and corruption, including the UK Bribery Act 2010. We expect our suppliers to resist corruption in all forms and work to eliminate corruption from supply chains.

Our suppliers are to take appropriate measures to prevent money-laundering in their operations and supply chains. We do not expect our suppliers to provide gifts and hospitality to us or any of their customers with

the intention of influencing us to obtain or retain business advantage. We neither expect nor allow any gift or hospitality to be given in our name by suppliers or third parties.

We expect our suppliers comply with all relevant law pertaining to Financial Crime and shall not do or omit to do anything which would cause Moonpig to be in breach of such relevant law.

We have a zero tolerance to any and all fraudulent activity and would expect nothing less from our suppliers. Suppliers must respect intellectual property rights and shall not knowingly infringe upon the IP of any other third party. This includes technology and digital IP, and we expect suppliers to manage their licences and digital IP.

Environmental Responsibility

At Moonpig we look to make moments that matter while committing to preserving our environment. We have a responsibility to consume resources sustainably and to move towards a positive environmental impact, and we expect our suppliers to join us in taking concrete measures to protect the environment and operate more sustainably.

Suppliers should be able to demonstrate evidence of how they identify, monitor and manage their direct and indirect impact on the environment. This includes awareness of environmental risks, and mechanisms and processes to minimise these risks. It also includes understanding of the opportunities present for the organisation.

Suppliers should seek to where possible:

- Reduce greenhouse gas emissions
- Move towards circular resource use and effectively manage waste
- Promote biodiversity
- Promote environmental responsibility
- Design products with environmental aspects in mind

Data Protection, Information Security and Business Continuity

Our suppliers must have the highest regard for the security of data and infrastructure. We expect our suppliers to comply with all data protection laws and regulations and to protect confidential and proprietary information. We also expect suppliers to take all necessary measures to safeguard data, including personal data, from all unauthorised and unlawful access, processing, modification and disclosure and to comply with contractual obligations for data protection, privacy and deletion.

Suppliers should be prepared for any disruptions of business operations and have backup resources where possible to ensure business continuity.

Our suppliers must have appropriate notification mechanisms in place to ensure we are promptly, and without delay, notified of any potential security events impacting our data or infrastructure and/or availability of our or our suppliers services.

Health and safety

We expect our suppliers to provide all employees and subcontractors with a safe and healthy work environment, and to mitigate as much as possible any risk to safety. We expect suppliers to have robust standards and procedures in place to minimise any hazards to the health or hygiene of their employees, subcontractors or customers and to comply with all international and local laws and regulations in regard with health and safety in their work environment and supply chain.

Whistleblowing

We are committed to conducting our business with honesty and integrity at all times. We expect our suppliers to speak out against suspected wrongdoing as soon as possible.

We commit to investigate all concerns raised, taking them seriously and ensuring confidentiality. Any genuine concerns raised in good faith, even if they turn out to be mistaken, will not suffer retaliation, detrimental treatment or disadvantage.

An external Whistleblowing Hotline can be contacted on +44 (0)800 915 1571 in the UK or + 31 800 7233 2255 in the Netherlands or via www.safecall.co.uk/report. The external Whistleblowing Hotline is provided our partners at Safecall www.safecall.co.uk

Any concerns can also be raised to company-secretary@moonpig.com, Identities will only be shared with people involved in investigating.

Authority to Commit Expenditure and Payment Process

Only certain individuals within Moonpig are authorised to commit Moonpig to expenditure, please contact the Procurement Team (procurement@moonpig.com) for confirmation of such individuals.

Suppliers must obtain a Purchase Order (PO) number prior to supplying any goods or services to Moonpig, as any invoice. Without a valid PO number will not be recognised by Moonpig's ERP system, and cannot be approved for payment.

Any information provided via personal email, faxes and/or telephone call will not create a commitment from Moonpig to authorise spend with a supplier. Any supplier who acts upon requests from Moonpig personnel that have not been properly authorised or which do not have a PO number may not be paid for those goods or services by Moonpig and do so at their own risk.

How to comply with this Code of Conduct

Suppliers who work with Moonpig who are in receipt of this code of conduct agree to adhere to the expectations set out. Suppliers should have documented processes to ensure compliance and we would expect our suppliers to be able to provide evidence of this documentation upon request.