

EQUALITY, DIVERSITY, INCLUSION AND HUMAN RIGHTS POLICY

This policy does not form part of any employee's contract of employment and we can amend it at any time. It covers all employees in the UK, Guernsey and the Netherlands, both on permanent and fixed-term contracts. This policy also covers contractors and temporary workers.

1. Purpose of this policy

- 1.1 This policy sets out our approach to human rights, equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, flexible working and leave training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 1.2 The policy is communicated to employees and training is provided to relevant employees. Our expectations of suppliers are set out in our Supplier Code of Conduct, which is published online and may be notified to all Suppliers periodically, as per part of renewal and on-boarding process.

2. Policy statements

- 2.1. Moonpig Group plc and its subsidiaries (together the "Group") is committed to encouraging equality, diversity and inclusion among all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers, and eliminating unlawful discrimination in our workplace.
- 2.2. The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.
- 2.3. The Group is committed to eliminating unlawful discrimination of customers in the provision of our goods and services.
- 2.4. The Group respects and supports the dignity, well-being and human rights of our employees, the workers in our supply chain, the communities in which we live and those affected by our operations.

- 2.5. The Group respects and upholds internationally proclaimed human rights principles as specified in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work ("ILO Convention") and the United Nations' Universal Declaration of Human Rights.
- 2.6 As part of our zero-tolerance approach to discrimination in any form, you and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**). We are also committed to providing equitable treatment to all those we deal with as an organisation, including customers and suppliers.

3. **Human rights**

- 3.1 The Group has policies and processes in place to identify, prevent or mitigate human rights risks, including the risk of modern slavery. Our employees receive annual training.
- 3.2 We expect our suppliers, through our contractual arrangements with them, to comply with human rights legislation and with our expectations of behaviour set out in our Supplier Code of Conduct. Further information is available in our Modern Slavery Statement which is available on the Group's corporate website at www.moonpig.group.

4. **Discrimination**

- 4.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.
- 4.2 The following forms of discrimination are prohibited under this policy and are unlawful:
- Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because of their sexual orientation.

- Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, imposing a particular dress code may adversely affect individuals with a religious belief if they cannot express their religious belief in a particular way due to the dress code's restraints. Such a requirement would be discriminatory unless it can be justified.
- Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-Harassment and Bullying Policy.
- Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

5. **Recruitment and selection**

- 5.1 Recruitment, promotion, and other selection exercises will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Shortlisting and interviewing should be done by more than one person where possible and with the involvement of the People Team, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.
- 5.2 We take steps to ensure that our vacancies are advertised to a diverse applicant market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

- 5.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 5.4 Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the People Team. For example:
- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
 - Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
 - Positive action to recruit disabled persons.
 - Equal opportunities monitoring (which will not form part of the selection or decision-making process).
- 5.5 Where necessary, job offers can be made conditional on a satisfactory medical check. For UK applicants, health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.
- 5.6 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality will be asked to undertake the relevant right to work checks for the country in which they are based.
6. **Training and promotion and conditions of service**
- 6.1 Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.
- 6.2 The Group's conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all eligible employees and that there are no unlawful obstacles to accessing them.

- 6.3 The Group is committed to gender pay equality, through systemic action to balance gender representation across our business. Progress and actions taken to support our commitment to close the gender pay gap are described in the most recent annual report of Moonpig Group plc, which is available on the Group's corporate website at www.moonpig.group/investors.

7. **Termination of employment**

We will ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

8. **Disabilities**

- 8.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

- 8.2 If you experience difficulties at work because of your disability, you may wish to contact the People Team to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The People Team may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

- 8.3 We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

9. **Part-time and fixed-term work**

Part-time and fixed-term staff should be treated the same as full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified, on objective grounds.

10. Breaches of this policy

- 10.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- 10.2 If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or through our Anti-Harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- 10.3 There must be no victimisation or retaliation against staff who complain about discrimination. If you believe you have been victimised for making a complaint or report of discrimination, or have witnessed it happening to someone else in the workplace, you should raise this through our Grievance Procedure.
- 10.4 We encourage the reporting of all types of potential discrimination, as this assists us in ensuring that diversity, equity and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.

11. Related policies

This policy is supported by the following policies and procedures:

- Anti-Harassment and Bullying Policy.
- Anti-Slavery and Human Trafficking Policy.
- Disciplinary Procedure.
- Grievance Procedure.
- Flexible Working Policy.
- Growing your family policy
- Special Leave Policy
- Whistleblowing Policy.

This policy was approved by the Chief Executive Officer on 4 September 2024.