

Modern Slavery Statement 2023 for Moonpig Group plc

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 greeting cards, gifts and flowers. We are an international group, comprising the Moonpig, Greetz, Red Letter Days and Buyagift brands.

The Greetz brand operates in the Netherlands and is therefore 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.
- 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 Executive Committee. Slavery and human trafficking risks are managed through the Group's "three lines of defence" risk management framework (as set out in the FY23 Annual Report and Accounts).

As a FTSE 350 constituent, the Group operates an internal audit programme. During the year ended 30 April 2023, the Group's outsourced internal auditors performed a review of internal controls relating to modern slavery and human trafficking and reported their findings to the Audit Committee of the Board. We are in the process of implementing the recommendations of this review.

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

- Anti-Slavery and Human Trafficking Policy. We updated the policy in April 2023 to broaden its scope and we will continue to review the policy annually to ensure that it remains comprehensive.
- Supplier Code of Conduct. This is published on the Group's corporate website. During the year ended 30 April 2023, we implemented a process to conduct modern slavery and human trafficking assessments for newly-signed Moonpig and Greetz suppliers and conducted assessments for the most critical existing suppliers. By 30 April 2024, we intend to conduct these assessments ahead of all renewals and extend the process to include Buyagift and Red Letter Days suppliers.
- Anti-Bribery and Anti-Corruption Policy.
- Whistleblowing 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 suppliers¹ 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 which outlines expectations of suppliers in terms of due diligence procedures, reporting breaches and training is appended to the relevant contracts with suppliers. We negotiate to include anti-modern slavery clauses in our supplier contracts. We assess modern slavery and human trafficking risks for all new contracts signed by Moonpig and Greetz. We will extend this to cover Buyagift and Red Letter Days by 30 April 2024.

¹ Top suppliers identified by spend and modern slavery risk, representing over 80% of procurement spend annually.

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 operate an automated tool which enables us to track progress against modern slavery risks in our supply chain. During the year ended 30 April 2023, we implemented tracking of the number of modern slavery and human trafficking assessments conducted and the percentage of suppliers with modern slavery and human trafficking policies in place.

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. 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 2023

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 and outlines our approach and work undertaken in relation to the financial year ended 30 April 2023. It is made on behalf of Moonpig Group plc, Cards Holdco Limited, Moonpig.com Limited and Experience More Limited.

This statement was approved by the Board of Directors of Moonpig Group plc on 24 October 2023.



Nickyl Raithatha
CEO and Director
24 October 2023