

## Whistleblowing Policy

### **1. Purpose and scope**

Moonpig Group plc and its subsidiaries (the “Group”, “Moonpig Group”, “our”, “we”) is 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 within the meaning of this policy. 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 the Group.

We recognise that different jurisdictions may have different legal requirements regarding whistleblowing, and that whistleblowers may have additional rights and protections under local laws and regulations, as applicable. This policy applies to our group globally, subject to any specific deviations and adaptations set out in the Appendix for each local jurisdiction where we have a presence. Currently, a country specific Appendix is included for the Netherlands. Please read the Appendix if applicable to you. 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.

This policy does not contain employment conditions or engagement terms and does not form part of any contract or terms of engagement. We may amend this policy at any time.

### **2. What is whistleblowing?**

Whistleblowing is the reporting of information which relates to reasonably suspected wrongdoing in any of our locations. It can include, among others:

- 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 applies to reports of reasonably suspected wrongdoings only. It does not apply to other type of concerns or complaints, for instance those that relate to an individual's own employment, position or personal circumstances at work, which should be raised under the Grievance policy.

### **3. 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](mailto:company-secretary@moonpig.com).

### **4. 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 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.

### **5. 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).

## **6. 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](http://www.protect-advice.org.uk)).

## **7. How will I be treated if I raise a concern?**

Anyone who reports suspected wrongdoing 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.

The Group may take disciplinary action against any person who is guilty of prejudicing any reporter.

## **8. 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 suspected wrongdoing is confidentially reported to the Board of Moonpig Group plc via its Audit Committee. If the report concerns a Board Director then they will be excluded from reports or discussions about that report.

## **9. 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.

## **10. 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 18 September 2023 and is effective from that date.

**Appendix to Whistleblowing Policy: local law deviations and adaptations**

**The Netherlands**

**Par. 1 Purpose and scope**

This Appendix incorporates the requirements of the Dutch Whistleblowers Protection Act. For reporters in the Netherlands, the following adaptations to the Whistleblowing Policy apply.

**Par. 2 What is whistleblowing?**

In the Netherlands, only reports concerning acts or omissions that fall under the definition of 'suspected wrongdoings' of the Dutch Whistleblowers Protection Act, qualify as whistleblowing within the meaning of this Appendix.

**Definition of 'reporter':**

All individuals who report or otherwise disclose a suspected wrongdoing within the context of their work related activities with Moonpig Group plc and/or any of its subsidiaries (the "Group"). In addition to employees, this includes, for example, interns, trainees, volunteers, self-employed workers, applicants, agency workers, (persons who work under the responsibility of) suppliers or (sub)contractors, persons in management bodies, such as members of a management or supervisory board, and shareholders.

**Definition of 'suspected wrongdoings' (*vermoeden van een misstand*):**

A suspicion, based on reasonable grounds that follow from knowledge obtained at the employer or through the reporter's activities for another company or organisation, concerning its employer and any of its affiliated group companies and relating to any of the following wrongdoings:

- a) the actual breach, or the risk thereof, of Union law, meaning an act or omission that:
  - i. is unlawful and relates to Union acts and areas that fall within the material scope of Article 2 of the EU Whistleblowing Directive, or
  - ii. defeats the object or purpose of the rules in Union acts and areas falling within the material scope of Article 2 of the EU Whistleblowing Directive.
  
- b) an act or omission in which the public interest is at stake and which concerns:
  - i. a violation or a risk of violation of a statutory provision or internal rules of the Group that contain a specific obligation and have been adopted by the Group on the basis of a statutory requirement, or
  - ii. a risk to public health, the safety of persons, the environment or the proper functioning of the public service or a company as a result of an improper act or omission.

A public interest is at stake when the act or omission not only infringes personal interests and shows a pattern or structural character or is severe and extensive. Other criteria can

also be taken into consideration, such as the number of people whose interests the report covers, the nature of the interests that are at stake, the nature of the suspected wrongdoing and the position of the person who is suspected of wrongdoing.

### **Par. 3. How do I raise a concern?**

A reporter can report a suspected wrongdoing to the Whistleblowing Officer, being the Company Secretary.

Alternatively, a suspected wrongdoing may be reported to the Head of Legal if the report concerns any person working with the Whistleblowing Officer.

Reports can be made:

- a) in writing, via email (company-secretary@moonpig.com) or letter;
- b) verbally, via the phone (through the Whistleblowing Hotline, the Company Secretary (0044 7713038592) or the Head of Legal (0044 7923257561), or other voice messaging system; or
- c) at the Reporter's request, within a reasonable term through a conversation at a physical location.

Although the reporter is encouraged to reveal their identity for the purpose of an effective and efficient investigation of the suspected wrongdoing reported, verbal reports can also be made anonymously (for example by deactivating caller identification when making a call to the Whistleblower officer(s), or via an anonymous report through Safecall). While we treat both anonymous and non-anonymous reports equally, if the identity of the reporter remains unknown it may further complicate the investigation process and this could imply an inability to protect the best interests of the reporter and/or give feedback.

If the report of a suspected wrongdoing is made verbally, the person to whom the report is made will record such report in writing. The reporter may provide feedback to such report.

### **Par. 5. Confidentiality**

The Group will procure that any reports of suspected wrongdoings are treated confidentially. The Group shall only share the contents of the report to those individuals whose involvement is necessary for the handling or investigation of the report. If information is disclosed, the name of the reporter shall not be mentioned and the information shall be furnished in such a way as to safeguard the anonymity of the reporter as much as possible.

The identity of the reporter, and such information from which the identity of the reported can, whether directly or indirectly, be retrieved, shall be kept strictly confidential, unless with the reporter's consent.

The Group may disclose reported matters and any facts relating thereto to third parties, including regulatory, governmental, law enforcement or self-regulatory agencies, to the extent reasonably necessary.

The reporter may consult an adviser confidentially about any suspected wrongdoing. Possible advisers that can be considered include an internal advisor, such as a confidential advisor (*vertrouwenspersoon*), a lawyer or legal adviser (at your own expense) or the Advisory Department of the Dutch Whistleblowers Authority (*Afdeling Advies van het Huis voor Klokkeluiders*) (free of charge).

## **Par. 6. Can I make a report to a third party?**

Reporters are encouraged to utilize the internal reporting procedure. However, you can also make a report to an external competent authority as referred to in article 2c and 2j of the Dutch Whistleblowers Protection Act, to the extent relevant.

Further information on external reporting procedures and the competence of the external authorities can be found on their respective websites.

## **Par. 7. How will I be treated if I raise a concern?**

The Group will ensure that the utmost efforts are made to protect the following individuals from retaliation:

- a) the reporter who reports a suspected wrongdoing in good faith;
- b) any person who assists in the (preliminary) investigation;
- c) any person who assists the reporter in the reporting process (such as a trusted adviser, colleagues or relatives of the reporter (e.g. involved third parties) who are also in a work-related relationship with the Group.

## **Par. 8. What happens when I raise a concern?**

The reporter shall receive acknowledgment of receipt of the report within seven (7) days of that receipt by the person to whom the report is made.

After receiving the report, the person to whom the report is made shall follow-up on the report, provided independence, confidentiality and absence of conflict of interest are ensured. Such follow-up may involve making enquiries first (with the reporter or internally) or carrying out a preliminary investigation or assessment as to legitimacy, specificity or scope of the report. It may be necessary to carry out an investigation which may be formal or informal depending on the nature and contents of the report. External investigators may be brought in where necessary. The reporter may be asked to provide further information, during the course of the investigation, albeit without there being an obligation to provide such information.

The person to whom the report is made shall reply to the reporter within a reasonable timeframe, but ultimately within a period of three (3) months of the acknowledgment of receipt referred to in above, the reporter will be informed about the action envisaged or taken as follow-up to the report and the grounds for the choice of that follow-up. Where the appropriate follow-up is still being determined at the end of this timeframe, the reporter will be informed about this and about any further feedback to expect.

The reporter will always be allowed to respond in writing to the follow-up and/or feedback to the report.

The Group will record a report of the suspected wrongdoing in a register set up for that purpose. The data following from the report, including but not limited to the communication with the reporter, will be kept in accordance with the data protection laws, if and to the extent applicable, and all other relevant internal rules and standards. When the data is no longer needed to comply with statutory requirements, the data will be destroyed.

If a report results in disciplinary measures against staff, this will be put in writing and added to the personnel file of the subject(s).