

Supplier Code of Conduct

Moonpig Group is committed to being a responsible business, and this includes the way in which we source goods and services from Suppliers. This Supplier Code of Conduct (“Code of Conduct”) sets out the standards and behaviours that we expect from all Suppliers.

The Code of Conduct applies to any organisation that either: (i) contracts with Moonpig Group plc or its subsidiaries (together “Moonpig Group”, “we” and “our”) to supply goods or services to Moonpig Group (including but not limited to reselling relationships); or (ii) has entered a business relationship with Moonpig Group; in each case a “Supplier” or plural “Suppliers”.

The Code of Conduct should always be considered in the context of the size and nature of the relevant Supplier organisation, the services that they provide and the jurisdictions that they operate in.

An overarching principle of the Code of Conduct is that Suppliers should, at all times, comply with applicable laws in meeting the requirements set out below.

Governance

We expect Suppliers to adhere to the following governance requirements in their own businesses, and have robust means of ensuring that the sub-contractors in their supply chains also comply:

- **Legal and regulatory compliance:** Suppliers must act with integrity, have a zero-tolerance approach to improper business conduct and comply with the laws and regulations of all countries in which they operate, as well as all international laws, regulations and industry practices related to the business that they conduct. This includes legislation relating to modern slavery and business activity with sanctioned entities or territories. Suppliers must keep their policies updated to comply with any change in laws or regulation.
- **Prevention of financial crime:** Suppliers must have robust policies and processes in place to prevent financial crime, including tax evasion, fraud, money laundering or terrorist financing. We also expect Suppliers to have in place reasonable procedures to prevent the criminal facilitation of tax evasion.
- **Business integrity and ethics:** Suppliers must adopt a zero-tolerance approach to bribery and corruption and uphold all relevant laws. We do not expect 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. Suppliers are required to avoid personal and financial interests which could conflict with their responsibilities to Moonpig. All actual or potential conflict of interests should be immediately notified to Moonpig.

- **Data and technology security:** Suppliers must have the highest regard for the security of data and infrastructure, comply with all data protection laws and regulations and protect confidential and proprietary information. Suppliers must 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. Suppliers must have appropriate mechanisms in place to ensure we are notified without delay of any potential security events impacting our data or infrastructure and/or availability of our or Suppliers' services.
- **Intellectual property:** Suppliers must respect intellectual property rights and shall not knowingly infringe upon the intellectual property of any other third party, including technology and digital property. We expect Suppliers to manage their licences and digital intellectual property.
- **Confidentiality:** Suppliers must keep all confidential information secret and confidential. Suppliers must ensure that they comply with all legal and regulatory requirements concerning insider trading or market abuse and should refrain from trading (or inducing others to trade) in Moonpig Group shares based on any confidential information they directly or indirectly obtain.
- **Cooperation with supplier due diligence:** Prospective Suppliers must keep all pre-contractual data confidential, enter into a non-disclosure agreement if requested and cooperate with all due diligence enquiries, which may include a self-assessment and security review. Suppliers must then cooperate with any required security review or other due diligence during the period of the contract.
- **Operation of Supplier whistleblowing procedures:** We expect Suppliers to provide a safe means for whistle-blowers to raise concerns relating to their business operations, and to encourage their employees, subcontractors, business partners and suppliers to raise any relevant concerns at the earliest possible stage.
- **Public communication:** Suppliers must not make public communications on Moonpig Group's behalf including but not limited to marketing materials, press releases, or media interviews that include reference to Moonpig Group or the work that they are performing (or have performed) with Moonpig Group, without prior written consent.
- **Corporate reputation:** Suppliers must not act in a way which intentionally or negligently harms the reputation of Moonpig Group and enforce this through good governance such as processes and policies on the usage of social media by employees.

Social responsibility

We expect Suppliers to adhere to the following in their own businesses, and have robust means of ensuring that the sub-contractors in their supply chains also comply:

- **Safe working environment:** We expect Suppliers to provide all employees and subcontractors with a safe, healthy and sanitary 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. This includes, but is not limited to, implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries. Where such hazards cannot be adequately prevented or controlled, Suppliers shall provide workers with appropriate personal protective equipment to protect against hazards typically encountered in that scope of work.
- **Safe living environment (where relevant):** Any residential facilities provided for workers must be safe and healthy and in accordance with local laws and regulations.
- **Anti-modern slavery:** Suppliers must operate a zero-tolerance approach to modern slavery and respect human rights, complying with all applicable human rights laws in the jurisdictions in which they work.
- **Labour rights and working conditions:** Suppliers must comply with relevant local and international requirements regarding: (a) forced, compulsory or trafficked labour, whether adults or children; (b) child labour; and (c) freedom of association.
- **Anti-harassment:** Suppliers must strictly prohibit any kind of direct or indirect discrimination, harassment, intimidation, victimisation, bullying or abuse of any employee, including through the threat of corporal or physical punishment or disciplinary action, or physically, sexually, racially, psychologically, or verbally.
- **Anti-discrimination:** We expect Suppliers to promote equal opportunities in employment and operate zero tolerance of 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.
- **Minimum pay and working hours:** We expect Suppliers to compensate all workers with wages, including overtime premiums, and benefits that at a minimum meet the higher of: (a) the minimum wage and benefits established by applicable law; (b) industry standards; and (c) an amount sufficient to cover basic living requirements. We expect Suppliers to ensure employees do not work excessive hours, in

accordance with national laws and the provisions of the relevant local standards on working time.

Sustainability

Moonpig Group acknowledges that its suppliers may have different environmental impacts, and could be at different stages of their own environmental journeys but as a minimum requirement, we expect Suppliers to adhere to the following:

- **Environmental risk management:** 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 opportunities, and mechanisms and processes to manage these.
- **Environmental sustainability practices:** Suppliers should encourage the implementation and use of initiatives and practices to reduce energy consumption, reduce greenhouse gas (“GHG”) emissions, effectively manage waste (including by reduce generation and increase recycling), support biodiversity conservation efforts, integrate environmental considerations into products and services design processes, and promote environmental responsibility and increase awareness of sustainability matters.
- **Supplier GHG emissions data:** Moonpig Group calculates and reports on GHG emissions in its value chain (“Scope 3 emissions”). We may request information relating to the following requirements, which Suppliers are required to provide within a reasonable time frame: (a) whether the Supplier has committed to net zero emissions targets that are aligned to the Science Based Targets initiative (“SBTi”); (b) Confirmation of the Supplier’s Scope 1, Scope 2 and (where calculated) Scope 3 GHG emissions, and what period these calculations cover; (c) what methodology and emission factors were used in these calculations and whether they are verified by a third party; and (d) GHG emissions expressed as a revenue intensity ratio (per GBP, EURO or USD of revenue).
- **Engage with Moonpig Group regarding SBTi-aligned net zero commitments:** We have published a corporate sustainability goal to obtain commitment from suppliers representing 67% of Moonpig Group’s Scope 3 emissions to set net zero GHG emissions reduction targets aligned with SBTi criteria by 30 April 2030. We have an ongoing programme of supply chain engagement, as part of which we may ask a Supplier to work with us to put in place a net zero GHG emissions reduction target. More information about the SBTi criteria and their current requirements can be found [here](#).

Authority to commit expenditure

Only certain individuals within Moonpig Group are authorised to commit Moonpig Group to expenditure. Please contact 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 Group. Without a valid PO number, invoices cannot be approved for payment. Communication by email, faxes and/or telephone call will not create a commitment from Moonpig Group to authorise spend with a Supplier.

Any Supplier that acts upon requests from Moonpig Group 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 Group and do so at their own risk.

Compliance with this Code of Conduct

Suppliers that work with Moonpig Group agree to adhere to the expectations set out in this Code of Conduct. Suppliers should have documented processes to ensure compliance and we expect Suppliers to be able to provide evidence of this documentation upon request.

Suppliers shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code of Conduct or questionable behaviour, or has sought advice regarding this Code of Conduct.

Nothing in this Code of Conduct shall supersede more stringent provisions in Moonpig Group's contract with a Supplier. Where the provisions of law and this Code of Conduct address the same subject, to the extent legally permitted, Suppliers should apply the provision which furthers the intent of this Code of Conduct to the greater degree.

Violation of this Code of Conduct may result in the following, or other, similar actions: asking the Supplier to audit its organisation or its supply chain and to report on its findings or recommending or requiring remediation. In some cases, the contract with the Supplier may be terminated.

This policy shall be reviewed on an annual basis and as and when necessary to reflect changes in relevant legislation. Changes to the Code of Conduct will be accessible in the updated version of the code online and may be notified to all Suppliers periodically, as per part of renewal and on-boarding process. All Suppliers shall comply with new requirements that are relevant to their business, as soon as practicable.

Reporting non-compliance

Suppliers should monitor their compliance with this Code of Conduct and report any breaches (actual or suspected) of this Code of Conduct as soon as possible to notices@moonpig.com.

Alternatively, concerns can be raised confidentially using the procedures set out in Moonpig Group's Whistleblowing Policy at: <https://www.moonpig.group/site-services/whistleblowing/>.

Approval

This policy was approved on 18 March 2024 by the Chief Financial Officer of Moonpig Group, who has Board-level responsibility for supply chain management.

Andrew MacKinnon
CFO, Moonpig Group plc