

## **Moneysupermarket.com Group PLC ("Company")**

### **Slavery and Human Trafficking Statement**

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the Company has taken during the financial year from 1 January 2023 to 31 December 2023 to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **Introduction**

During 2023, Moneysupermarket.com Group PLC has continued to develop our processes and procedures to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **Key Areas of Focus for 2023:**

- Embedding procurement strategy for supplier selection and the contracting process;
- Training employees directly involved in engaging suppliers on best practice supplier sourcing, due diligence and contract management;
- Developing our supply base segmentation methodology to ensure appropriate categorisation of suppliers according to risk and criticality and continuing to apply suitable on-boarding and contracting processes for each; and
- Embedding the supplier management and governance framework to ensure adequate ongoing oversight of suppliers in relation to performance and risk.

#### **Our Organisation and Business**

Moneysupermarket.com Group PLC is the holding company for a group of companies operating price comparison and editorial based websites. We have a premium listing on the London Stock Exchange. Our registered office is in Ewloe and we have approximately 693 employees in our Group, all of whom are based in the UK.

We operate through our leading brands, MoneySuperMarket, MoneySavingExpert, TravelSupermarket, Decision Technologies, CYTI and Quidco and we are committed to providing customers with the services, tools and products they need to save and grow their money.

#### **Our Commitment**

We are committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the Modern Slavery Act 2015.

#### **Our Supply Chains**

Our supply chains include marketing agencies, online search engines, software vendors and professional service firms. We do not act as a producer, manufacturer nor retailer of physical goods and have no supply chains in relation to such activities.

#### **Our Policies on Slavery and Human Trafficking**

As reported in our previous statements, Moneysupermarket Group's internal policies include our Anti-Slavery and Human Trafficking Policy where we confirm our zero-tolerance approach to modern slavery; and which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also have an Anti-Slavery and Human Trafficking Policy for Suppliers which, as well as setting out our requirements, also includes links to government guidance and factsheets.

These two policies are supported by our Whistleblowing Framework, which encourages and provides clear guidance on raising concerns in confidence relating to any wrongdoings which extends to slavery and human trafficking. Our Whistleblowing Framework is supported by an external, confidential reporting hotline which enables employees of the Group to raise concerns in confidence. All reports received via our Whistleblowing Framework will be fully investigated and where appropriate, remedial actions taken.

As part of the Group's acquisition strategy, due diligence is undertaken to ensure that appropriate policies and procedures are in place to meet statutory requirements and where required, various Group policies are rolled out, including Whistleblowing and the Anti-Slavery and Human Trafficking Policy.

### **Assessment of Modern Slavery Risk within our Supply Chain**

In the past year we have continued our focus on Modern Slavery, conducting risk assessments to determine where the risk of modern slavery and human trafficking lies, both within the Group and in its supply chains.

Suppliers have been assessed in terms of the nature and risk of the services they supply to the Group and the geographical risk. These assessments cover the entire scope of our business, encompassing marketing agencies, online SEM, IT consultancies, HR consultancies, building contractors, cleaning companies and other professional service providers. Geographically, most suppliers are based in the UK (or we contract with and make payment to a UK office) with the exception of some SEM and technology licencing vendors. We are aware from due diligence, that some of our IT consultants are part of global organisations that utilise the services of individuals based in countries with emerging economies.

### **Due Diligence Processes for Slavery and Human Trafficking**

We understand that our biggest exposure to Modern Slavery remains with organisations, whilst having a UK office base, who utilise the services of individuals based in countries with emerging economies.

Existing suppliers categorised as Tier 1 Risk Suppliers ("Tier 1") and material Tier 2 Risk Suppliers ("Tier 2") have been made aware of our zero tolerance of modern slavery and all new suppliers are asked to attest their compliance with the Modern Slavery Act 2015.

We have introduced new guidance, as part of our onboarding process, all new providers and suppliers being required to complete due diligence questionnaires incorporating questions on modern slavery and their associated policies and procedures. The responses will be reviewed by the Procurement and Customer Operations teams and, if required, discussed with the Governance team. Contracts are also agreed, ensuring they cover compliance with modern slavery.

We undertake adverse media checks for all providers and suppliers, ensuring we can take action if required, should any of our supply chain be associated with any form of exploitation, as contemplated by the Modern Slavery Act 2015.

## **Training**

Employees are required to complete refresher training covering our Code of Conduct and Human Trafficking Policy on an annual basis. Training is provided to new employees as part of their induction.

## **Assessment of effectiveness in preventing modern slavery**

In order to assess the effectiveness of the measures taken by Moneysupermarket.com Group PLC we are, or will be reviewing:

- investigations undertaken into reports of modern slavery (including any concerns raised under our Whistleblowing Framework) and remedial actions taken in response; and
- staff training levels, including a review of the current Code of Conduct training.

## **Further steps**

We will continue to undertake training of employees, particularly those directly involved in engaging suppliers, to ensure they understand and comply with the supplier contract management framework.

This statement was approved by the Boards of Moneysupermarket.com Group PLC, Moneysupermarket.com Limited and Moneysavingexpert.com Limited.

Signed



Peter Duffy  
Chief Executive  
Moneysupermarket.com Group PLC  
Date: 30 October 2023

[Our Modern Slavery Act Transparency Statement for the financial year ended 31 December 2021 can be found here.](#)

[Our Modern Slavery Act Transparency Statement for the financial year ended 31 December 2020 can be found here.](#)

[Our Modern Slavery Act Transparency Statement for the financial year ended 31 December 2019 can be found here.](#)

[Our Modern Slavery Act Transparency Statement for the financial year ended 31 December 2018 can be found here.](#)

[Our Modern Slavery Act Transparency Statement for the financial year ended 31 December 2017 can be found here.](#)

[Our Modern Slavery Act Transparency Statement for the financial year ended 31 December 2016 can be found here.](#)