

## **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 2018 to 31 December 2018 to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **Introduction**

During 2018, 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 2018:**

- Embedding procurement strategy processes in supplier selection and contracting process
- Training employees directly involved in engaging suppliers on supplier sourcing, due diligence and contract management framework
- Developing technology systems to improve visibility and management of the supply chain
- Segmenting our supply base according to risk and criticality and applying suitable on-boarding and contracting processes for each
- Reviewing risk assessments conducted in 2017

#### **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 750 employees in our Group, all of whom are based in the UK.

We operate through our leading brands, MoneySuperMarket, MoneySavingExpert, TravelSupermarket and Decision Technologies 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 media agencies, online search engines, software suppliers and developers and professional service firms. We do not act as a producer, manufacturer or 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. All reports will be fully investigated and appropriate remedial actions taken.

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

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

All employees in the Group have their place of work as one of the offices owned or leased by the Group with the exception of a small number (less than five) who work from home. Our HR team oversees the engagement and contracting process for these individuals and articulates the benefits available to employees via handbooks and the Group's intranet.

Suppliers have been assessed in terms of the nature of services they supply to the Group and the geographical risk. These assessments cover the entire scope of our business, encompassing media agencies, online SEM, IT consultancies (including programmers and coders), PR agencies, 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 the UK office) with the exception of some SEM and IT licence suppliers. We are aware from due diligence that some of our IT programming/coding suppliers, whilst having a UK office base with whom we have a contract, are part of global organisations and utilise the services of individuals based in countries with emerging economies. Our risk assessment has also highlighted the possibility that in service industries, particularly construction and cleaning, there could be the potential for workers to be put at risk of forced labour. We have categorised our suppliers as Tier1, Tier 2 or Tier 3 Risk Suppliers.

### **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 have been asked to attest their compliance with the Modern Slavery Act 2015. During 2018, we have been working on embedding a robust procurement framework to support supplier onboarding and contract renewals. This includes, as part of our onboarding process, new suppliers in Tier 1 and Tier 2 being required to complete due diligence questionnaires

incorporating questions on modern slavery and their associated policies and procedures. The responses will then be reviewed by the procurement team and, if required, discussed with the Company Secretarial team. New suppliers are also made aware of our zero tolerance of modern slavery and are issued with contracts covering compliance with modern slavery.

### **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.

### **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 when engaging and managing suppliers.

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

Signed

A handwritten signature in blue ink that reads "Mark Lewis". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Mark Lewis  
Chief Executive  
Moneysupermarket.com Group PLC

Date: 26 February 2019

[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.](#)