

## **Moneysupermarket.com Group PLC (“Company”)**

### **Modern Slavery Act Transparency 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 2016 to 31 December 2016 to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **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 head office is in Ewloe and we have just under 600 employees, all of whom are based in the UK.

We operate through our three leading brands, MoneySuperMarket, MoneySavingExpert and TravelSupermarket 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**

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.

During the year we also adopted 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 increased our focus on Modern Slavery, undertaking a risk assessment 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. 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 Category 1, Category 2 or Category 3 Risk Suppliers.

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

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

Existing suppliers categorised as Category 1 Risk Suppliers ("Category 1") and material Category 2 Risk Suppliers ("Category 2") have been made aware of our zero tolerance of modern slavery and have been asked to sign a confirmation of compliance with the Modern Slavery Act 2015. During 2017 we will be rolling out a new supplier contract management framework following an overall review of supplier management. This will include, as part of our onboarding process, new suppliers in Category 1 and Category 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 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**

During the year we have revised our Code of Conduct and trained employees both on the Code of Conduct and our Anti-Slavery and Human Trafficking Policy. Training is provided to new employees as part of their induction.

### **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.

Peter Plumb  
Chief Executive  
Moneysupermarket.com Group PLC

Date: 27 February 2017