

## Smartbox Group UK Limited- MODERN SLAVERY STATEMENT (FYE 30 APRIL 2022)

### 1. Buyagift – Our Business

Buyagift is the UK's leading provider of experience days and gift experiences in the ecommerce gift experience sector. Buyagift issues gift vouchers to its customers via its website. Buyagift has its head office in Hertfordshire, United Kingdom, employing over 160 employees and operating across the United Kingdom.

We are a part of the Smartbox Group, the European No 1 in experience gifts, which has its head office in Dublin, Ireland. Smartbox currently operates in 11 European countries (France, Spain, Italy, Portugal, Belgium, Denmark, the Netherlands, Sweden, Switzerland, UK and Ireland).

### 2. Our Statement on modern slavery and human trafficking.

Buyagift is opposed to slavery, servitude, compulsory or forced labour and human trafficking (together, "Modern Slavery") in all its forms. Buyagift is committed to ensuring that no Modern Slavery takes place in any part of the business which Buyagift controls, or within its supply chain.

Our Anti-Modern Slavery Policy ("the Policy") 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 that Modern Slavery is not taking place anywhere in our supply chains.

### 3. Modern Slavery risk in the context of Buyagift's business

3.1 In all jurisdictions in which Buyagift operates, its corporate activities are concerned with the provision of online experiences to customers and ancillary or related services. Buyagift typically provides those services via locally incorporated and managed companies. None of the jurisdictions in which Buyagift provides its services ranks highly on the Global Slavery Index <https://www.globallslaveryindex.org/2018/findings/highlights/>

3.2 Buyagift does not employ significant numbers of agency workers or contractors except for peak trading periods (during Christmas for example). The agency and contract workers are treated equally with our full time and permanent employees.

3.3 All employees, contractors and agency workers are required to adhere to the Policy. We aim to provide our staff members with guidance and actively encourage them to report slavery concerns using our Code of Conduct and Whistleblowing Policy.

### 4. Modern Slavery risk in the context of Buyagift's supply chain

4.1. Buyagift is committed to ensuring ethical compliance, to act with integrity in all our business relationships and to eradicate forced labour and human trafficking from within its supply chain.

4.2. Our supply chain includes suppliers providing experience days in relation to the products on our website, professional service providers, consultants in the areas of legal, finance and marketing, utility providers, cleaning and waste management, IT equipment, office stationery supply companies, food and beverages for the consumption of employees and guests. We take care to ensure that our suppliers do not fall under the high-ranking slavery index.

### 5. Response to Modern Slavery risks

5.1. Buyagift has no cause to suspect that Modern Slavery is currently present within its business or supply chain, nor any evidence that it has been present in the past.

## 5.2. Buyagift:

5.2.1 has in place a Code of Conduct and Whistleblowing Policy which enables employees and contractors to report illegal or unethical behaviour without fear of reprisal;

5.2.2 has adopted a straightforward Anti-Modern Slavery Policy, which is primarily focused on encouraging employees and contractors to report Modern Slavery, and what to do if it is detected in Buyagift's business or supply chain. Buyagift will keep this policy under review and update it periodically in line with UK Home Office guidance;

5.2.3 will ensure that responsibility for continuing compliance with the Policy rests with a senior employee of Buyagift;

5.2.4 will ensure a high level of understanding of the risks of Modern Slavery in our supply chains and our business by providing training, where appropriate, to our staff;

5.2.5 engages in regular dialogue with suppliers of services, and in particular those involving any element of outsourced labour, and will adopt a risk-based approach to evaluating the risk of Modern Slavery with regard to existing suppliers and supply chains; and

5.2.6 requires material suppliers of goods and services to undertake to comply with applicable laws, and where appropriate will include contractual clauses aimed at ensuring suppliers are prohibited from encouraging or engaging in Modern Slavery. Buyagift will require new suppliers (or, where agreements are being renewed, existing suppliers) to adhere to them, and will conduct supply chain audits and ethical due diligence on new suppliers where any material risk of Modern Slavery has been identified.

## 6. Responsibility and Due Diligence

6.1. The Board and senior management of Buyagift will take responsibility for implementing this statement and provide adequate resources and investment to ensure that Modern Slavery is not taking place within the business or its supply chains. We have developed a Code of Conduct through which we aim to achieve best practice. We will aim for all our supply chain to adhere to our Code of Conduct in future years.

6.2. We will take steps to ensure due diligence.

6.3 If we find a supplier is non-compliant with our policies or code of conduct or provides inadequate information, we will work with them to improve their performance. In cases of persistent non-compliance, we may consider terminating the business relationship as soon as possible.

6.4 Employees who do not follow the policy will be given the opportunity to receive additional training, if their behaviour does not improve, they may face disciplinary action.

6.5 We aim to take steps to track and report in future statements on key performance indicators to ensure that our suppliers are compliant, training our employees who will be involved in procurement process and will include results of our risk analysis exercise.

## 7. Approval & publication

This statement has been approved by the Board in accordance with the requirements of section 54(1) of the Modern Slavery Act 2015, which applies to Buyagift for the financial year ending 30 April 2022.



**Dan Mountain**  
Chief Executive Officer, Smartbox Group UK Ltd