



## Schedule 1

# Anti-Slavery and Anti-Trafficking Statement

This statement sets out the steps to be taken by Notonthehighstreet Enterprises Ltd (“Not On The High Street”) and constitutes our slavery and human trafficking statement, for the current financial year.

## 1. About us

Not On The High Street helps people celebrate life's big and small moments with a huge range of gifts.

It's a curated marketplace that connects the best small creative businesses with the world. Bringing together over 4 million customers with 6,000 small creative businesses selling more than 350,000 products, Not On The High Street offers an extensive selection of joyful designs, affordable gifts and inspiring edits. Selling through Not On The High Street offers small businesses access to an engaged customer base, expert business support and a ready-made tech and data infrastructure.

## 2. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and, taking into account our marketplace structure, to implementing and enforcing effective systems to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

## 3. Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chains. Our Anti-Slavery and Anti-Trafficking 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 slavery and human trafficking is not taking place anywhere in our supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or throughout our supply chain is the responsibility of all those working for us, with us or under our control. Our employees are required to avoid any activity that might lead to, or suggest, a breach of this statement. All employees are required to read, understand and comply in full with our Anti-Slavery and Anti-Trafficking Policy.



We also operate a Whistleblowing Policy, which encourages our employees to report any concerns or wrongdoing which extends to any human rights violations like modern slavery. All reports will be fully investigated and appropriate remedial action taken.

## 4. Reporting on KPIs and Assessment of Risk

We understand that our biggest exposure to modern slavery is within our own business and within our supply chain. The below table sets out what key points of action we've taken to tackle modern slavery:

Actions
In September 2021 we commissioned an external risk assessment to understand our modern slavery exposure and controls in place.
Our Anti-Slavery and Anti-Trafficking Policy is accessible to all employees on our staff intranet. The policy is kept under review.
Our 'Seller Terms and Conditions' continue to reference modern slavery legislation, and the fact that all Partners of notonthehighstreet are required to comply with it in their business dealings. Failure to do so may lead to a Partner's suspension or removal from the site.
We have a 'Seller Code of Conduct' requiring all Partners to act ethically and with integrity, adopting a zero-tolerance approach to modern slavery.
We send regular communications to all Partners reminding them of the need to ensure their continued compliance with the Act at all times. This year, we have also sent communications to Partners that may be at a higher risk of potentially being impacted by modern slavery due to the products they are selling to make them aware of such increased risk and to provide information and further resources for them to investigate their own supply chains.
Our supplier onboarding process requires suppliers to confirm their compliance with all applicable modern slavery laws (including for UK suppliers, the Act). This is a mandatory field to be filled in as part of the new supplier form.
Company wide training on modern slavery is issued to new employees and contractors as part of their induction training and, generally, annually as a refresher to all of our employees and contractors. Our training is Company-specific with practical examples and guidance for staff depending on their role. The training invitation is mandatory and provided via an online platform.
We have an Anti-Modern Slavery Champion to appropriately handle any concerns or queries from staff.

In the year ahead, we will continue to consider and take the following actions, as appropriate and proportionate to Not On The High Street's risk profile including:

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- (i) mitigating any identified prevalent risk of slavery and human trafficking occurring in our supply chain (Partners and others);
- (ii) protecting whistleblowers within our business and take appropriate remedial action if necessary; and
- (iii) staying up to date with any recognised changes to the Act or related legislation.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Act. We expect the same high standards from all of our Partners, contractors and other suppliers and, as part of our contracting processes, we include prohibitions against modern slavery and we expect our Partners to hold their own suppliers to the same high standards.

## 5. Responsibility for this statement

Our Board of Directors has overall responsibility for ensuring that all those under our control comply with this statement and our related policies. Management at all levels are responsible for ensuring their reports understand this statement and comply with our Anti-Slavery and Anti-Trafficking Policy.

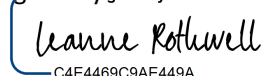
The Not On The High Street Legal Team and Anti-Slavery Champion have primary and day-to-day responsibility for dealing with this statement and any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

## 6. Training

Training on the risks Not On The High Street faces from modern slavery in our supply chain is expected for all individuals who work for Not On The High Street. We are committed to maintaining and improving our practices to combat slavery and human trafficking.

This statement has been approved by the Board of Not On The High Street.

Signed by:



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**Leanne Rothwell**

**CEO**

**Notonthehighstreet Enterprises Ltd**

**Last Updated: February 2024**