

MODERN SLAVERY STATEMENT

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE YEAR ENDED APRIL 2025

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. Social responsibility is treated extremely seriously at the Hemingways Group of Companies and we always conduct our business in accordance with our core values of integrity, respect, commitment and innovation.

We recognise that as a growing business with multiple supply chains, and activities in numerous different countries, we need to be aware of the issues related to modern slavery and proactively act to ensure that slavery and human trafficking are not present in our business or supply chain.

OUR GROUP'S ORGANISATIONAL STRUCTURE

Hemingways Marketing Services is an independent, privately-owned company that provides a range of services, most often in the field of e-commerce, to numerous retail brands and manufacturers. In addition, we sell products such as branded confectionery and retail gift cards and digital codes direct to consumers and corporate clients.

This statement is made on behalf of the following group operations and companies:

- Hemingways Marketing Services Ltd
- Hemingways Group Holdings Ltd
- Hemingways Marketing Services B.V
- Hemingways Marketing Services Pty Ltd
- Voucher Express
- VEX Rewards
- Cadbury Gifts Direct
- Bliss Systems Ltd
- Exbos Ltd

SUPPLY CHAINS

Hemingways procures a wide range of goods and services from a variety of suppliers. Our supply chains currently support the following activities:

- Product for resale including gift cards, digital codes, gift vouchers, confectionery.
- Printing and packaging including stationery supplies
- Distribution and logistics services
- Warehouse equipment, storage and processing equipment
- Technology services including hosting, data security, technical environment, processing software.
- Recruitment and training
- Advertising and marketing
- IT services
- Business process outsourcing, e.g. payroll

Hemingways has adopted a risk-based approach to the assessment of our business and supply chain, which has involved taking geographical, industry and market factors into account in order to identify categories of supply that may present a higher risk of modern slavery being present.

ACTIONS TO ADDRESS RISK

In most cases, Hemingways works with companies accredited by our partner companies who regulate and enforce their own regimes of regular compliance audits and who have contractual commitments to comply with applicable laws and regulations. A good example of this would be our supply of printed packaging and distribution materials to support our

confectionery activities. In this instance we source directly from print companies accredited and regulated by Cadbury owner, Mondelez International.

Elsewhere the company utilises the services of companies regarded as 'blue-chip' or best in class and who correspondingly are subject to continuous regulatory assessment. A good example would be the use of DPD logistics and Royal Mail Group as distributors of both confectionery and pre-paid products such as gift cards.

Supply lines that fall outside of these channels are monitored by Hemingways and as part of our initiative to identify and mitigate risk we have undertaken, or are in the process of undertaking, the following actions:

Including obligations in our supplier on-boarding forms and terms and conditions, that cover modern slavery legislation.

Conduct briefings and awareness training amongst staff, particularly those responsible for sourcing and on-boarding new suppliers, to cover an assessment of the slavery and trafficking risk in our supplier sourcing process.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

APPROVAL

To this end responsibility for the systems and methods deployed by Hemingways to ensure that slavery and human trafficking is not involved in our supply chains is held at director level and included for review at Board meetings involving consultation with legal, HR, and procurement departments.

This statement has been approved by the Board of Directors of Hemingways Group Holdings Ltd and Hemingways Marketing Services Ltd.

Signed: Andrew Johnson, Group Managing Director : May 2025

A handwritten signature in black ink, appearing to read 'A. Johnson', is written over a white rectangular background. Below the signature, a dashed line extends horizontally across the page.