



INVITATION DIGITAL LIMITED (“IDL”) - MODERN SLAVERY ACT TRANSPARENCY STATEMENT

INTRODUCTION

The Modern Slavery Act 2015 (the “Act”) is an Act of the Parliament of the United Kingdom. It is designed to tackle slavery in the UK, and consolidates previous offences relating to human trafficking and slavery. The Act also introduced a new corporate reporting obligation requiring companies that qualify to set out the steps they are taking to tackle modern slavery issues in their businesses and supply chains. IDL is in compliance with the corporate reporting obligation. You can click [here](#) to learn more about the Act.

At IDL, we believe we have a responsibility to ensure that our business is conducted in an ethical way, and we actively engage to address social issues. We realise that modern slavery is such an issue, and take seriously our responsibility to comply with the Act and to assist in preventing and combating slavery and human trafficking where possible.

As such, we are issuing this Modern Slavery Act Transparency Statement, which includes a description of our organizational structure, merchants and supply chain, efforts to identify and mitigate the risk of slavery and human trafficking in our supply chain, and information about how to report concerns or complaints arising under or related to the Act.

ORGANISATIONAL STRUCTURE

IDL is part of Groupon’s global e-commerce marketplace. Groupon, Inc. is the ultimate parent company of IDL. Groupon, Inc. is headquartered in the United States (Chicago, Illinois).

IDL operates two distinct businesses: Giftcloud and Vouchercloud. The Giftcloud business focusses on supplying reward codes to customers of its clients. The Vouchercloud business focusses on supplying free discount coupons to customers, which can be redeemed with the original issuers.

CLIENTS AND SUPPLY CHAIN

IDL’s clients, vendors, and suppliers (together, “**Merchants**”) include but are not limited to:



- Merchants that supply coupons to IDL's Vouchercloud business;
- Merchants that supply reward codes to IDL's Giftcloud business;
- Merchants that engage IDL's Giftcloud business to provide reward codes to their customers; and
- Merchants who provide office-related operations (e.g., cleaning, catering, stationary, etc.)

DUE DILIGENCE AND RISK ASSESSMENT

IDL takes a zero-tolerance approach as it relates to any potential slavery or human trafficking issues and undertakes risk assessments of all potential merchants, vendors, and suppliers as part of our initiative to identify and mitigate slavery and human trafficking occurring in our supply chain:

- Vouchercloud obtains most of its business via reputable agencies and affiliate networks, which have their own modern slavery statements and compliance policies. In instances where Vouchercloud works directly with Merchants, it will only work with reputable national or international brands that are of sufficient size and sophistication to be knowledgeable of and comply fully with the Act.
- Similarly, Giftcloud only obtains supplies of reward codes from, and provides such codes to, reputable national or international brands that it confidently feels are aware of the Act and effectively comply with it.
- We provide several methods for both employees and non-employees to report their concerns and/or complaints regarding possible modern slavery practices to Groupon's Compliance Team (which also covers IDL), including by using our ethics hotline, EthicsPoint, which provides for making such a report anonymously. We make clear in our policies that employees who report their concerns or complaints regarding violations of applicable laws or policies in good faith shall not be penalised.
- In addition to the above, going forward, we are developing procedures to identify risks with our business and supply chains and put in place appropriate due diligence measures within the business.

POLICIES



Vendor Code of Conduct

Groupon, Inc. has put in place a [Global Vendor Code of Conduct](#) (the “**Vendor Code**”) that sets out our requirements for all Merchants who do business with or on behalf of Groupon, Inc. It is made binding on Merchants through our agreements with them.

The Vendor Code specifically states that Groupon, Inc. prohibits Merchants from engaging in child labour as well as any form of coerced labour such as slave labour, prison labour, indentured labour, bonded labour, and any other form of involuntary servitude. The Vendor Code also states that all Merchants are responsible for monitoring their global supply chains to ensure compliance with applicable coerced labour and human trafficking laws.

We also offer an informational video for our Merchants that outlines our policies for working together and shares the resources available to our Merchants through the Vendor Code. If Merchants have questions on the Vendor Code at any time, our Compliance team is available to support.

Anyone who has knowledge of an actual or potential violation of the Vendor Code is asked to make a report using the methods described in the Monitoring and Reporting section below.

UK Whistleblower Policy

Groupon’s UK Whistleblower Policy, which pertains to all employees, contractors, consultants, and agency staff who work for Groupon in the UK (including IDL), provides information about raising concerns and complaints, including those arising under or related to the Act, and provides methods for reporting such concerns and complaints, which are also detailed in the Monitoring and Reporting section below.

TRAINING

Groupon provides training to its employees regarding our Code of Conduct, which covers broader ethical and compliance issues, and the reporting mechanisms available to employees and non-employees to report concerns and complaints arising under or related to such issues. This training is provided to new employees at onboarding, and to all employees every two years thereafter. In alternate years, employees are required to complete a recertification quiz.



Going forward, our aim is to provide training that covers our policies and processes in place to combat slavery and human trafficking specifically and the reporting mechanisms available to employees and non-employees to report concerns and complaints arising under or related to the Act.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) REPORT

In 2022, Groupon Inc published its inaugural [ESG Report](#) (the “**Report**”) in respect of 2021. The Report reaffirmed Groupon Inc’s commitment to responsible business practices and how being a responsible corporate citizen that delivers positive impact in the world helps us to create long-term value for the many stakeholders we serve. The Vendor Code, employee training programme and various reporting mechanisms, as well as their significance, are described in the Report. The Report also categorizes “Governance & Business Ethics” as an ESG “Tier 1” priority issue based on the assessments underlying the Report.

MONITORING AND REPORTING

Concerns and complaints arising under or related to the Act should be reported to the Compliance Team at legalcompliance@groupon.com or via EthicsPoint at gr.pn/ethicspoint. EthicsPoint complaints may be made anonymously. The Compliance Team will promptly investigate any concerns and complaints arising under or related to the Act and/or the objectives set out in this Statement.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Groupon’s slavery and human trafficking Statement for the current financial year. It has been approved by the Invitation Digital Ltd Board on 29 December 2022.

Francisco Falcato de Sousa

Francisco Falcato de Sousa (Jan 4, 2023 14:49 GMT)

Authorized Signatory, Invitation Digital Ltd Board Member

Date: Jan 4, 2023

Covering Financial Year 2021 (January - December)