



ANTI-SLAVERY AND ANTI-TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("Act").

This statement sets out the steps to be taken by Notonthehighstreet Enterprises Ltd ("NOTHS") and constitutes our slavery and human trafficking statement, for the current financial year.

1. ABOUT US

Notonthehighstreet is 'the home of thoughtful gifts', the leading curated online marketplace connecting the best small creative businesses, with the world. The brand has gained the trust and loyalty of its customers through offering an alternative to the High Street: a curated product selection with unique designs, high-quality craftsmanship and inspiring stories about the people who make them.

Founded in 2006, NOTHS has its headquarters in Richmond Upon Thames, South West London.

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. In our 2016/2017 statement, we committed to report on our key points of action to tackle modern slavery. The below table sets out what we have done:

Actions
Our Anti-Slavery and Anti-Trafficking Policy is accessible to all employees on our staff intranet. Employees are required under their employment contracts to review this from time to time. The policy is kept under review.
Our 'Seller Terms and Conditions' continue to reference the Act 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 sent further communications to all Partners reminding them of the need to ensure their continued compliance with the Act at all times.
Our new Procurement process requires suppliers to confirm their compliance with the Act as a mandatory field to be filled in as part of the Request for Proposal form.
Our contracts with suppliers will regularly specify the Act as a specific contractual obligation to comply with.
Company wide training on modern slavery is issued annually to all our employees and contractors, most recently in September 2019. The training is mandatory and is provided via an online training provider.

In the year ahead, we will continue to consider and take the following actions, which are appropriate and proportionate to the NOTHS' risk profile:

- (i) identify and assess any further risk areas in our supply chain (Partners and others);
- (ii) mitigate the risk of slavery and human trafficking occurring in our supply chain (Partners and others);
- (iii) protect whistle blowers within our business and take appropriate remedial action if necessary;
- (iv) continue to monitor potential risk areas in our supply chain (Partners and others); and
- (v) stay 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 specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, 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 NOTHS Legal Team has primary and day-to-day responsibility for dealing with this statement and any queries about it and considering internal control systems and procedures to ensure they are effective in countering modern slavery.

6. TRAINING

Training on the risks NOTHS faces from modern slavery in our supply chain is mandatory for all key individuals who work for NOTHS and is provided annually.

Our approach to modern slavery shall continue to be communicated to all our Partners, other suppliers and contractors at the outset of our business relationship with them and shall be reinforced as appropriate thereafter.

We are committed to maintaining and improving our practices to combat slavery and human trafficking. This statement has been approved by the Board of NOTHS.

Signed by



Claire Davenport
CEO
Notonthehighstreet Enterprises Ltd

Last Updated: October 2019