



Modern Slavery Statement

Introduction

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 to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's and all its subsidiaries, slavery and human trafficking statement for the financial year ending December 2022.

Top Online Partners Group Limited's commitment

We take our responsibilities under the Modern Slavery Act 2015 seriously and are committed to building and improving our practices to combat slavery and human trafficking. We have zero tolerance to slavery and human trafficking.

Organisation's structure

We are a provider of cashback services in the consumer money saving sector. We operate cashback services through subsidiaries in the UK, USA, Germany and France.

Our supply chains

Our supply chain includes:

- Affiliate networks and agencies who track the transactions carried out by our members
- Merchants who advertise on our website
- Sub-contractors who assist us in delivering communications to all our members
- Direct office suppliers

Our policies on slavery and human trafficking

Even though we, like many other businesses, have had to adopt a more flexible way of working, we continue to commit to ensuring that there is no modern slavery or human trafficking in any part of our business.

Considering the obligation to report on measures to ensure that all parts of our business are slavery free we have in place a designated Anti-Slavery Policy.



Our Anti-Slavery Policy demonstrates 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 business.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we have provided training to our staff and will continue to renew such training every two years, subject to any change in regulation.

signed:

A handwritten signature in black ink, appearing to read 'O. Ragg', is written over a faint circular stamp.

Oliver Ragg

Director and Co-founder

Top Online Partners Group Limited

16 th January 2023