



## **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 in order 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 2019.

### **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, India, and Germany.

### **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**

We are committed 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 put 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 our business, we will provide training to our staff.

signed:

Oliver Ragg

Director and Co-founder

Top Online Partners Group Limited

3<sup>rd</sup> January 2020