

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps UGC (the Company, or 'we') has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. It constitutes our slavery and human trafficking statement for the 2016/17 financial year.

Founding Director statement

We recognise the suffering which modern slavery and human trafficking causes. In an increasingly global marketplace, we recognise that all businesses have a responsibility to understand whether modern slavery and human trafficking is taking place within their supply chains and this is a responsibility we take seriously.

Our organisation

We are a Private Limited Company registered in England with registration number 08600709. We operate from offices in London but have partners in Germany, Canada, Italy and Spain. We provide "spend anywhere" gift cards and prepaid mastercard products.

Our supply chains includes Mastercard, Andaria t/a Intercash, Wirecard, Thames Card Technology and TAGNitecrest. We all come together to be able to provide the market with TheirPerfectGift.

As a Company, we always work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. Corporate social responsibility is an intrinsic part of our culture and we aim to make a lasting and positive impact on the communities in which we live and work. We expect the same from our suppliers and business partners.

Our policies on slavery and human trafficking

The Company is committed to ensuring we are not supplied by anyone who engages in human trafficking and modern slavery.

The Anti-Slavery Policy has been approved by our management, and ultimately the Board of UGC is responsible for this Policy.

What we are doing

Our working practices respect and uphold human rights for our partners, employees and contractors. We take the following steps to identify risks of modern slavery and human trafficking within our business and our supply chain:

- We assess risk related to human trafficking and forced labour associated with our supply base. Our preliminary assessments will be based upon geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.
- We carry out due diligence on all relevant and appropriate suppliers and customers (where relevant) by asking for information on their policies on fair sourcing of goods and services, and employment practices.
- We have a code of ethical business practices, which we expect all suppliers to adhere to. The code sets out the standards we expect our suppliers to uphold at all times relating to various matters including anti-bribery and corruption, human trafficking, slavery, and ethical behaviour.

This statement has been approved for and on behalf of the members of the Board of UGC.

Thish De Zoysa
Founding Director

Anti-Slavery Policy

Combatting Modern Slavery

Modern slavery is a tragic global phenomenon that we all must work together to eradicate. It is contrary to good business and destroys lives and communities. UGC is committed to managing this issue in our own business and supply chain to make a positive impact on the people and communities we serve.

Policy

Modern slavery can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. We cannot tolerate modern slavery in any form and we actively work to prevent this within our business and within our supply chain. We are committed to implementing and enforcing effective systems and controls to ensure this is the case. We comply in full with our obligations under the Modern Slavery Act 2015.

This policy applies to all persons working for us or on our behalf in any capacity, including directors, employees at all levels, shareholders, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for this policy

Our Chief Executive has overall responsibility for this policy. Our General Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring their staff understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with this policy

All directors and employees must read, understand and comply with this policy. Everyone working for UGC is responsible for preventing, detecting and reporting modern slavery if it is encountered. If anyone becomes aware of or suspects that modern slavery is taking place, they must immediately notify our General Counsel.

This applies whether or not the suspected slavery involves UGC or one of its third party suppliers. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Communication and Awareness

The Firm will provide training on this policy as part of the induction process for all individuals who are involved in the appointment of suppliers. All staff will be notified of this policy on joining and receive training as appropriate from time to time.

We will also communicate this policy to all suppliers, contractors and business partners at the outset of our business relationship with them and ensure it is reflected in our contractual arrangements with suppliers.

Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.