

Modern Slavery Act Transparency Statement

We are confident of the steps we have taken to ensure there is no modern slavery or human trafficking in Excalibur Holdco Limited and its subsidiary companies including but not limited to Excalibur Bidco Limited, Wowcher Limited and LivingSocial Europe Limited (the "Excalibur Group of companies").

Organisation's structure

The activity of certain of the Excalibur Group's subsidiaries is to offer daily voucher deals and online discounts for local services, travel and goods.

Our supply chains

Our supply chains are many and varied. We considered each of our business operations and their supply chain and believe the following to be the areas of greatest potential risk:

- Contracted office maintenance staff (e.g. Cleaning, Security, Building services).
- Suppliers and merchants located in developing countries.
- Software and technology developers located in developing countries.

Our policies on modern slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for modern slavery and human trafficking

As part of our initiative to identify and mitigate risk we sought the following assurances from each of our business units:

Employee assurance

We require appropriate right to work documentation to be obtained for all staff including temps, interns and business work placement staff. We reviewed our working practices and facilities to ensure that the Excalibur Group was not committing an offence under the Modern Slavery Act 2015.

Supplier assurance

We require our suppliers to confirm that (i) they respect their workers' human rights; (ii) they provide employees with good working conditions, fair treatment and reasonable rates of pay; (iii) their workers must not work under any threat of penalties or sanctions; and (iv) they do not keep the original copy of any workers' identity documents.

In addition, our agreements with suppliers contain provisions that require a supplier to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force from time to time, including the Modern Slavery Act 2015. As some of our suppliers are based abroad, our agreements contain an additional provision which states that the supplier should not engage in any activity, practice or conduct which would constitute an offence under the Modern Slavery Act if such activity, practice or conduct were carried out in the UK.

We have a right to terminate our agreements with suppliers if we reasonably consider that a supplier has committed a breach of any such provision.

Ongoing compliance approach

We are committed to conducting our business with honesty and integrity, and we expect all staff and our suppliers to maintain high standards.

- Whistleblowing

Our Whistleblowing Policy encourages a culture of openness and accountability within the Excalibur Group and highlights that whistleblowers will not suffer any detrimental treatment from reporting a concern, even if the concern turns out to be mistaken. All Excalibur Group companies have contacts within the business to whom they can report a whistleblowing concern. We also provide access to an independent whistleblowing hotline to facilitate confidential reporting of illegal or unethical behaviour.

- Review

We will review and update our approach to ensuring that the Excalibur Group and our supply chain is free from modern slavery and human trafficking as our businesses and the inherent supplier risks change over time.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Excalibur Group's modern slavery and human trafficking statement for the financial year ending 30 September 2018.

Signature:

Name:

Role:

Company:

Date:


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Karen Kemble-Diaz
Chief Operating Officer
Excalibur Holdco Limited
22 March 2019