

Modern Slavery and Human Trafficking Statement Trusted Shops 2022

This is the Trusted Shops slavery and human trafficking statement as required by Section 54(1) of the UK Modern Slavery Act 2015 (hereinafter the “**Act**”) which covers the Trusted Shops GmbH based in Cologne, Germany as well as its subsidiaries mentioned further below under “Organisational structure and supply chains”.

Trusted Shops provides security, orientation, and transparency – helping online shoppers to make better decisions in the digital world. We are an international company working for more trust, more security, and more valuable insights which we strive to ensure through the services we provide to both consumers and retailers active online.

Trusted Shops does not tolerate modern slavery and human trafficking. We understand our unique responsibility and are committed to continuously assess our work to understand and address any modern slavery risks that may arise through our business operations.

About Trusted Shops and Its Services

Trusted Shops was founded in 1999 in Germany as a response to the burgeoning digital market, and specifically to the insecurities and risks it entailed, and still entails, for all parties involved. For over 20 years, Trusted Shops has provided a plethora of different digital services aimed at reducing these risks as far as possible and has become one of the leading providers of quality seals, rating systems and buyer protection products for online shops and their customers.

One of our primary goals is to maintain and increase consumer protection and fair competition in online commerce. This is one of the reasons why Trusted Shops is a leading member of the Initiative D21 e.V., Germany's largest partnership of politics and business for the shaping of the information society. Trusted Shops has its headquarters in Cologne with branches in France, Spain, Poland, the Netherlands, Italy and offers its services in many EU states and Switzerland as well as other non-European countries.

Our products include the well-known European Trusted Shops Trustmark, one of the most widespread certifications for online shops. The prerequisite for obtaining it is compliance with our strict quality criteria which go beyond the legal minimum requirements and are continuously adapted to current legislation. Currently, more than 25,000 online shops are Trusted Shops members and carry the Trusted Shops Trustmark through which we make an important contribution to guaranteeing consumer protection and fair competition in online trade.

We also offer an elaborate feedback system that enables enterprises to give their customers the opportunity to rate their experiences with that enterprise, i.e., their purchases, transactions or other encounters. Customers that have integrated our review system display the collected Feedback for marketing purposes via our various widgets, e. g. the well-known "Trustbadge".

Finally, Trusted Shops offers its Buyer Protection to consumers through which their purchases at certified online shops are protected. Up to a certain amount, the Buyer Protection covers cases in which the certified online shop does not (fully) reimburse a consumer who is entitled to such a reimbursement in several specific cases. A consumer can register for the Buyer Protection during the order process in the online shop or independent of a purchase on the Trusted Shops websites for consumers.

Organisational Structure and Supply Chains

The Trusted Shops GmbH is a privately owned company with limited liability pursuant to German law which was founded and registered in Cologne, Germany in 1999.

Since its incorporation, the Trusted Shops GmbH has founded some subsidiaries in several EU countries, namely France, Poland, the Netherlands and Spain, namely:

- Trusted Shops Poland Sp. z o.o (Poland)
- Trusted Shops France SARL à associé unique (France)
- Trusted Shops Benelux B.V. (Netherlands)
- Trusted Shops Iberia S.L. (Spain)
- Trusted Shops Italia S.R.L. (Italy)

Across its main office in Cologne and its international branches, Trusted Shops currently employs around 900 people.

As a SaaS and digital service provider, our business mainly revolves around our expertise, know-how and intellectual property, including mostly the digital solutions and consultation services we provide to our customers. Although we engage with suppliers for a range of services, the majority of our suppliers provide us with IT hardware, software, network and advertising services. Almost all of these suppliers are based and operate in EU countries or the U.S. where modern slavery is neither prevalent, nor is there a high risk thereof. The suppliers we work with, must, for the same reason, themselves comply with statutory anti-slavery and human trafficking obligations and are subject to the Trusted Shops Modern Slavery Code of Conduct. Therefore, our business model in general does not entail a high slavery risk.

Organisational Policies and Due Diligence

Trusted Shops has always undertaken to respect the highest professional standards, and to duly comply with applicable statutory regulations both in its internal relations (employees) and in relation to its partners, suppliers and customers.

- Our Employees

We work to maintain high professional and ethical standards towards our employees, and ensure our employees also know their role in maintaining them among each other and in relation to external parties.

Our recruitment and employment procedures foresee pre-employment screenings and checks of applicants, including i. a. their right to work in accordance with the laws of the respective countries, their background information as voluntarily provided by them during the application, and any potential references indicated in the application.

All our employees are provided with a written contract of employment. As an integral part, each contract includes our Compliance Policy, which contains, among others, conduct

instructions regarding bribery, compliance with applicable laws, business relations etc, is an integral part of every employment contract. New employees therefore must get acquainted with the Compliance Policy's contents and are obliged to abide by it by virtue of their contract with Trusted Shops. During onboarding in their first days, new employees also receive additional training and information on our internal policies and processes, so they know who to turn to in case of questions, issues, complaints, and / or any other matter of concern, throughout their employment. This may be their People Managers, HR Business Partners, Corporate Legal, the Equality Officer and the Officer for People with Disabilities, or alternatively, one of the anonymous communication channels in place where it's possible to report complaints or abuse either digitally (more info below) or physically. Besides, we perform employee surveys as another way of gathering feedback..

We are committed to provide to our employees and potential applicants a fair and competitive compensation package to ensure staff retention and employment attractiveness. This takes into consideration the cost of living across all Trusted Shops locations.

Furthermore, we provide employees working remotely with all the technical equipment required and support them to our best of ability with any necessary administrative steps, while complying with all statutory regulations pertaining to employment in their respective location.

- Our Customers

As a business that provides trust building services and aims for a more trustworthy and safe digital space, we are compelled by the very nature of our business to evaluate our prospective customers up front and filter out those whose conduct or public image is not conducive to our aims. Trust, transparency, and integrity are values that are important to us which is why we expect both our employees and our customers to always act with integrity, build trust and promote transparency.

For this reason, we do not provide our services to entities that do not align with our business ethics and goals, or to those that we otherwise deem suspicious, harmful, or downright illegal, as they pose a threat both to consumers online as well as to the quality of our services and to our repute. Our commitment to conducting our business in an ethical and compliant fashion is reflected in our Compliance Policy to which we are obliging customers on an ongoing basis. Furthermore, we have set in place a certification process that each customer of ours has to complete successfully in order to receive our trust mark and be our contractual partner. Some of the requirements for this are laid down in our [Trusted Shops Quality Criteria](#). Our contracts foresee the option to immediately terminate our contractual relations with any customers that fall short of our requirements, even if it is only at a later point, and that do not undertake anything to remedy the situation.

In order to ensure quality and transparency in our services we oblige our customers to comply with our [General Membership Terms](#) which lay out additional duties for them.

- Our Suppliers and Partners

We strive to pick out suppliers and partners whose location and whose line of business reduce the risk and possibility of any exploitation or abuse to a minimum. We tend to choose suppliers and partners which are well-known and enjoy a good reputation in their field of business which they would protect by abiding to the legal and ethical requirements of their line of work. Where possible, we conduct prior checks of the respective companies' history, conduct and supply chains. We avoid companies we regard as not upholding certain standards and our values, and we aim to find companies that are known to comply with said

standards or, even better, are accordingly certified by independent third parties. We are also obliging our partners and suppliers on an ongoing basis to abide by our Compliance Policy.

As an online reporting channel for everyone (meaning both employees and any external parties such as, among others, private individuals, partner companies, service providers and contractors) to voice any concerns or suspicions of infractions, we have set up Hintbox. The Hintbox reporting system may be used to personally or completely anonymously report real or potential violations to Trusted Shops of which the reporting party has become aware in the course of its cooperation with the former. More information about the use of Hintbox can be found in our [Help Centre](#). You can access Hintbox [here](#). (Language settings can be changed in the upper right corner).

In general, we continue to:

- Choose our suppliers and customers with care.
- Review on a regular basis our suppliers and customers.
- Enter into business relationships with entities that reflect our organisational values.
- Seek to ensure that any supplier or customer has an ethical treatment clause in the contract they provide us with, especially in case we deem them to be medium to high risk, e.g., based on their geographical location, or otherwise. This is to ensure that the work environment and conditions they provide to their employees meet the required legal and ethical standards.

Risk assessment

In order to identify entities and sectors posing a high risk of modern slavery or similar forms of abuse, and to assess this risk specifically, we use the following indicators:

- Reliance on low-skill workforce.
- Reliance on migrant workforce.
- Presence of children.
- Hazardous or undesirable work.
- Entity based in a country that experiences high levels of corruption, weak governance, and poor enforcement of human rights, or that has outsourced some or all of its workforce to such a country.
- Complex and obscure company structures with ties to such countries as described in the above paragraph, or to other entities and practices connected to modern slavery and similar abuses.
- Multi-tiered and obscure supply chains

As a digital service provider, our main suppliers provide online-based services, software and general consulting services, all of which we always aim to receive from reputable businesses. Based on these factors as well as on our organisational policies and due diligence, we consider the risk of modern slavery in our supply chain to be low.

If a customer or supplier does not fulfil our requirements or is unwilling to amend their conduct, we may end our engagement with them.

Further measures

- As a growing company in a globalised economy, we are constantly trying to improve our approach to tackling potential issues regarding modern slavery and human trafficking in our supply chains even though we deem the risk thereof to be rather low. This is why we are trying to constantly adapt the precautions we are taking to the circumstances at hand by figuring out where we can expand and / or improve them. This includes the following areas: specific training to all employees regarding compliance issues, auditing of customers and suppliers, monitoring and documentation of risk factors at early stages.

We are constantly monitoring our business relations and supply chains for potential instances of modern slavery and human trafficking. Specifically, we regularly (re-)assess the overall risk our line of business poses in this aspect, as well as particular risks potentially posed by particular business transactions or business partners. Currently, we deem our area of business, our locations and markets, as well as our supply chains to generally carry a rather low risk due to the aforementioned factual circumstances and measures carried out in our company. Nevertheless, we continually tighten our monitoring and the obligations of our contractual partners with regard to tackling modern slavery and human trafficking.

This statement was approved by the Managing Directors of the Trusted Shops GmbH on 12 July 2022 and is signed by



Jean-Marc Noël

Managing director