



Prezzee Pty Limited  
Modern Slavery Statement 2025

## **1. Introduction**

This Modern Slavery Statement (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) (Act) and the Modern Slavery Act 2015 (UK). It sets out the actions taken by Prezzee Pty Ltd (ACN 602 963 422) and its subsidiaries including Prezzee UK Limited (Company number 12851966) (collectively referred to as "Prezzee", "us", "we" or "our"), to assess and address modern slavery risks in our operations and supply chain during our financial year ending 31 December 2024.

Prezzee is committed to operating responsibly and ethically. We recognise the importance of identifying, preventing and addressing modern slavery risks, and we are focused on embedding this responsibility into the way we do business. We aim to work with partners and suppliers who share our values and commitment to ethical business practices. Many of these relationships are long-standing and built on mutual trust, transparency and respect.

## **2. About Prezzee: Who we are and what we do**

Prezzee Pty Ltd is a digital gifting platform headquartered in Sydney, Australia, with satellite offices located in the United Kingdom and the United States. As a technology driven company, we operate a global eGift card marketplace that enables consumers and businesses to send, receive and manage digital gift cards from a wide range of leading retailers.

Prezzee's core services include our consumer facing app and website, Prezzee Business for corporate gifting and reward and partnerships with retailers and loyalty platforms. Our platform is underpinned by proprietary technology, which is primarily developed and maintained in house, with support from a small number of outsourced engineering partners.

While our operations are primarily digital, our supply chain includes a range of third-party service providers. This includes technology vendors, professional services firms, and brand partners. We also engage Business Process Outsourcing (BPO) providers based offshore,

who play a key role in supporting functions such as engineering and customer service as part of our extended operations.

### **3. Our Policies, Procedures and Practices**

The values of compliance, ethics, openness, fairness, and impartiality guide our employment practices. We use reputable recruitment partners when sourcing employees and contractors who are required to comply with all applicable legislation when carrying out activities on behalf of Prezzee.

We have a range of internal policies in place to support ethical conduct and guide our employees in acting responsibly and lawfully in the course of their work. These policies reflect our commitment to integrity, transparency, and accountability across our operations.

Key policies are listed below and are made accessible to all employees as part of our onboarding process as well as ongoing compliance training.

We have in place several policies to help guide our employees, including:

- Global Code of Conduct Policy
- Global Whistleblower Policy
- Global Diversity, Equity, Inclusion & Belonging Policy
- Global Gifts, Anti-Bribery & Corruption Policy

### **Reporting Concerns and Whistleblowing Mechanisms**

Prezzee is committed to creating a safe and transparent environment where concerns about unethical, illegal or inappropriate behaviour can be raised without fear of retaliation. This includes any concerns related to potential modern slavery or human rights violations in our operations or supply chain.

We maintain both internal and external channels for reporting concerns. Employees and stakeholders can raise issues through our internal reporting structures or via Your Call, an independent, confidential whistleblowing service that enables anonymous reporting. These mechanisms are outlined in our Global Whistleblower Policy, which is accessible to all employees and regularly reviewed to ensure it remains effective and compliant with relevant legislation.

#### **4. Risk of modern slavery practices in our operations and supply chain**

Prezsee is committed to acting ethically and with integrity in all our business relationships. We do not tolerate any form of modern slavery or human trafficking and have systems and controls in place to help prevent such practices within our business and supply chains.

Due to the nature of our operations and the types of suppliers we engage, we have assessed that the overall risk of modern slavery within our supply chain is low. Prezsee operates as a digital gift card platform, with our product offerings being fully digital. These products do not have a manufactured component (outside of the technology infrastructure needed to deliver them), which further reduces the potential for modern slavery risks typically associated with physical goods production.

The majority of our suppliers are based in Australia, the United Kingdom, and the United States – regions which, according to the Walk Free Foundation’s Global Slavery Index, rank among the lowest globally in terms of modern slavery prevalence.

We recognise, however, that no supply chain is entirely free from risk. We have identified a small number of suppliers operating in sectors or geographies with potentially higher exposure to modern slavery risks. These suppliers have undergone enhanced due diligence, which includes reviewing their labour practices, policies, and commitments to ethical sourcing.

Prezsee expects all suppliers to adhere to high standards of ethical conduct, including lawful employment practices, fair wages, safe working conditions and zero tolerance for forced or child labour.

#### **5. Actions Taken**

Prezsee is committed to continuous improvement in identifying, assessing and addressing the risks of modern slavery within our operations and supply chains. In line with this commitment we have taken a number of steps and identified further actions to strengthen our due diligence and risk management practices.

Due Diligence and Risk Assessment Activities

- We reviewed our current onboarding practices, and the due diligence processes undertaken for new partners and/or suppliers

- We conducted a review of our key suppliers, considering their location, sector, and service type. As noted above, most of our suppliers are based in Australia, the United Kingdom and the United States which are jurisdictions assessed as having low prevalence of modern slavery.
- For suppliers identified as operating in higher risk geographies or industries such as our BPO providers we undertook targeted due diligence, which included reviewing the supplier's policies, and practices in relation to ethical labour standards.
- We incorporated insights from the Walk Free Foundation's Global Slavery Index into our assessment process to benchmark risk levels across the countries in which we and our suppliers operate.
- We have reviewed our standard contractual agreements to ensure they include robust provisions that require compliance with applicable laws including modern slavery legislation and ethical labour practices.

### **Future Commitments**

During the reporting period, we have not identified any instances of modern slavery within our operations or supply chains. However, we remain vigilant and are committed to continuously strengthening our approach. The following actions have been initiated or are planned as part of our ongoing efforts:

- **Improving Procurement and Supplier Oversight:** To strengthen our ability to manage procurement and supplier related risks, Prezzy is in the process of implementing a new software platform that will centralise supplier information and procurement workflows. This platform will provide a single source of truth for supplier data and enable greater visibility across our supply base, including segmentation by category, geography and risk profile. As part of this initiative, we are exploring the introduction of enhanced procurement processes, including clearer expectations for suppliers around ethical and responsible business practices. This forms part of our broader commitment to building more structured, transparent, and responsible procurement practices as our modern slavery program continues to evolve.
- **Employee Awareness:** We will raise internal awareness by making this Modern Slavery Statement readily accessible to employees and ensuring they understand its purpose and importance.
- **Policy and Recruitment Safeguards:** We will continue to review and strengthen our policies and recruitment processes to ensure they remain effective in preventing modern slavery and human trafficking.

- **Training and Education:** We are committed to delivering ongoing training on modern slavery as part of Prezsee's broader compliance program, to ensure relevant employees are equipped to identify and respond to potential risks.  
**Ongoing Risk Assessment:** We will regularly reassess modern slavery risks across our operations and supply chain to ensure our response remains targeted, relevant, and effective.

## 6. Measuring effectiveness

Prezsee recognises the importance of monitoring and assessing the effectiveness of our actions to mitigate modern slavery risks. Given the size and structure of our team, we focus on pragmatic, scalable measures that allow us to build capability over time. Our current and planned effectiveness measures include:

- The implementation of the new procurement software where all supplier information is centralised which will facilitate the regular review of supplier risk profiles.
- Measuring employee completion rates of modern slavery awareness training delivered through our compliance program, particularly for those involved in supplier relationships.
- Keeping a central record of any concerns or issues raised in relation to modern slavery, and if they arise documenting how they are reviewed and addressed.
- Conducting an annual review of our modern slavery framework including policies, training, and supplier engagement to identify areas for improvement and ensure our approach remains fit for purpose.

As our processes mature, we will continue to refine our measures and build on our internal capabilities to further strengthen our risk management and oversight.

## 7. Training

We understand that one of the most effective tools for mitigating Prezsee's modern slavery risks is to raise awareness through education. We train employees on relevant legislative requirements which impact our business. We regularly communicate our company policies through our global HRIS and roll out annual mandatory training courses which includes training specific to Modern Slavery and Human Trafficking. The training

course is designed to help Prezzees employees understand what modern slavery is, who is affected, how to recognise the signs and know what to do if they suspect modern slavery.

## **8. Consultation and Board Approval**

This Modern Slavery Statement was developed with the input of Prezzee's Chief Executive officers and key employees. We consulted the relevant entities we own or control in its development.

This Statement was approved by the Board of Directors of Prezzee Pty Ltd on 20 June 2025 and signed by Shaun Bonétt in his capacity as Executive Chair.

Signed

Signed by:  
  
8A68AF16F9974C2...  
Shaun Bonétt  
Executive Chair