



Anti-Slavery & Trafficking Policy

Introduction

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. The victims of modern slavery are often unable or unwilling to challenge the treatment they are suffering and it can include:

- The hidden exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider (including rogue individuals working within businesses without the knowledge of management).
- Exploitation through a variety of means for example, imposing a requirement on a worker to pay for work-finding services or the forced use of accommodation by workers.

Hallmark Cards PLC ('Hallmark') strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high standards.

Purpose

The purpose of this document is to set out Hallmark's stance with respect to the prevention of modern slavery and in particular:

- the expectations that it has of its employees, the third parties with which it contracts (e.g. for the supply of labour, goods and services) and those operating within Hallmark's wider supply chain;
- the commitments that Hallmark itself makes to ensure that modern slavery is not taking place anywhere within the organisation or its supply chains.

Scope

This Policy applies to all sites operated by Hallmark in the UK and Republic of Ireland, together with all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners. It applies to all third parties who contract with Hallmark or who are involved at whatever level in Hallmark's wider supply chain (including but not limited to tier one agents and suppliers of labour, goods and services and those engaged further down the supply chain).

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Workers must ensure that they read, understand and comply with this policy.

Policy

Hallmark expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

1. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
2. We are committed to gaining a clearer understanding of how modern slavery operates in different contexts, of who is affected and how, and of the risks of modern slavery existing within our industry.
3. We are committed to having a clear and transparent company statement, which is reviewed regularly and is communicated to our employees posted on our website, which sets out the steps taken to prevent modern slavery and trafficking and the effectiveness of those measures.
4. We are committed to training relevant employees in modern slavery so that they know how to identify it in practice and how to respond and are able to take responsibility for developing and operating company procedures relevant to this issue. We are committed to ensuring that our employees understand and adhere to our Ethical Performance & Code of Conduct and are trained on it as appropriate.

5. Knowingly failing to comply with the Ethical Performance & Code of Conduct and/or this Anti-Slavery and Human Trafficking Policy is a disciplinary offence. Our Ethical Performance & Code of Conduct and this Anti-Slavery and Trafficking Policy will be re-communicated to all staff annually, at which time they will re-affirm their compliance to the principles therein, which will include our zero-tolerance to all forms of modern slavery. In our own operations we shall use media, in a variety of European Languages, to raise awareness of this issue including the use of workplace posters, worker leaflets and relevant content in our applicable induction processes. We shall publicise the means by which individuals can raise concerns about modern slavery.
6. We are committed to engaging with our industry, stakeholders and direct suppliers to address the risk of modern slavery in our operations and supply chain.
7. As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with our Ethical Performance & Code of Conduct and this Anti-Slavery and Trafficking Policy, which sets out the minimum standards required to combat modern slavery and trafficking.
8. Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Ethical Performance & Code of Conduct and this Anti-Slavery and Trafficking Policy. In this regard Hallmark:
 - a) takes the position that job finding fees are a business cost which shall not be paid by job applicants and will not knowingly engage with any individual or organisation to source and supply workers without first seeking confirmation that workers are not being charged a work finding fee.
 - b) will ensure that all staff responsible for directly recruiting workers are aware of issues relating to modern slavery and are equipped to recognise where there is a risk of it occurring.
 - c) will ensure that labour sourcing, recruitment and worker placement processes within our organisation are under the control of trusted, trained and competent staff members. Training and recruitment practices will be managed by HR function and suppliers of labour will be audited annually.
 - d) will encourage and support employees and agency workers to report issues of modern slavery which may be occurring.

- e) Shall require labour providers and other high risk organisations in the labour supply chain to adopt policies and procedures that prevent modern slavery from occurring.
 - f) Third parties providing labour to Hallmark shall be monitored through monthly supplier review meetings.
9. We are committed to working with our suppliers to educate them on the risks of modern slavery occurring. We shall audit and carry out due diligence on our suppliers, based on risk, for their compliance with our Ethical Performance & Code of Conduct and this Anti-Slavery and Trafficking Policy. We aim to work with suppliers to remediate incidents of non-compliance and may terminate the relationship in response to gross, persistent or deliberate failures.
10. We commit to reporting suspicions of instances of modern slavery to the appropriate authorities.

Responsibility for the policy

The HR Director, Operations Director and Head of Procurement have approved this policy, and are committed to making available sufficient resources for its implementation. The International Supply Chain Director has overall responsibility for ensuring compliance.

The Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Reporting modern slavery

Employees must notify their manager in the first instance or the HR department in accordance with the Whistleblowing policy as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy.

If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify the Compliance officer or HR Department as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be

mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on Pixel.

Breaches of this policy

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Associated documents

Supply Chain & Procurement Training HMK102F1
Standard Terms & Conditions (notably Clause 17) April 2016
HMKETHPOL Ethical policy
HMK32F1 Supplier profile
Whistle- Blowing Policy V.2 January 15

Signed By: John Franey - UK Supply Chain Director