



Modern Slavery & Human Trafficking Statement

Financial Year: April 2024 — March 2025

Publication Date: 01st April 2025

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the steps Motivates Inc Ltd (T/A Lifestyle) has taken during the financial year ending 31st March 2025 to ensure that slavery and human trafficking are not taking place in our company or supply chains.

Our Commitment

At Lifestyle, we are committed to acting ethically and with integrity in all our business relationships. We have a zero-tolerance approach to modern slavery in all its forms and will not tolerate it within our company or supply chain.

Our Structure and Supply Chains

Our business and supply chains are a reward and recognition product and scheme supplier, working almost exclusively in the UK. Our main product being the Lifestyle Gift Card, a multi-retailer Gift Card with a 18 — 24 month expiry.

The majority of the retailers are household names within the UK and all uphold the same zero tolerance approach to slavery and human trafficking.

Our supply chain and 3rd party outsource list is similarly limited to a handpicked few. These include household names in the retail and leisure sectors, technology suppliers like Microsoft, Rackspace and Twilio or a very small, vetted group of partners who provide us bespoke rewards on partner request. We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors.

Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references. We haven't been made aware of any allegations of slavery or human trafficking activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk Assessment and Due Diligence

We have undertaken a risk assessment to identify areas of our supply chain most at risk of modern slavery. This includes:

- Reviewing suppliers operating in higher-risk sectors (e.g. manufacturing, hospitality).
- Assessing suppliers located in higher-risk geographies.

Actions taken to mitigate these risks include:

- We will be requiring all suppliers to confirm compliance with the Modern Slavery Act.
- Contractual obligations around ethical labour practices.
- Ongoing supplier monitoring and review.

Training and Awareness

We recognise the importance of equipping our employees to identify and respond to risks of modern slavery. Training provided includes:

- Awareness training for all new employees during onboarding.
- Targeted training for procurement and supply chain staff.
- Regular reminders and resources shared through internal channels.

Policies and Procedure

Our policies support this commitment, including:

- Ethical Procurement Policy
- Whistleblowing Policy (encouraging staff to raise concerns confidentially)
- Code of Conduct for Suppliers



Effectiveness and Next Steps

We measure effectiveness by:

- Reviewing supplier audits and questionnaires
- Monitoring whistleblowing reports
- Tracking completion rates of team training

In the coming year, we will:

- Expand training coverage across all teams.
- Introduce supplier self-assessment forms.
- Strengthen reporting channels for staff and suppliers.

Approval

This statement has been approved by the Board of Directors and is signed on their behalf by:

A handwritten signature in black ink that reads "Adam Hobbs".

Adam Hobbs
CEO

30th March 2025