



GROUPON - MODERN SLAVERY ACT TRANSPARENCY STATEMENT

MyCityDeal Ltd, Groupon Shop Ltd, Groupon International Travel GmbH, and Groupon Goods Global GmbH (together, “**Groupon**”).

This joint statement is made by Groupon pursuant to section 54(1) of the UK's Modern Slavery Act 2015 (the “**Act**”) in respect of the financial year ended 31 December 2024.

INTRODUCTION

The Act is an Act of the Parliament of the United Kingdom. It is designed to tackle slavery in the UK, and consolidates previous offences relating to human trafficking and slavery. The Act also introduced a new corporate reporting obligation requiring companies that qualify to set out the steps they are taking to tackle modern slavery issues in their businesses and supply chains. Groupon is in compliance with the corporate reporting obligation. You can click [here](#) to learn more about the Act.

At Groupon, we believe we have a responsibility to ensure that our business is conducted in an ethical way, and we actively engage to address social issues. We realise that modern slavery is such an issue, and take seriously our responsibility to comply with the Act and to assist in preventing and combating slavery and human trafficking where possible.

As such, we are issuing this Modern Slavery Act Transparency Statement, which includes a description of our organizational structure, merchants and supply chain, efforts to identify and mitigate the risk of slavery and human trafficking in our supply chain, and information about how to report concerns or complaints arising under or related to the Act.

ORGANISATIONAL STRUCTURE

Groupon is part of a global e-commerce marketplace. Groupon, Inc. is the ultimate parent company of the entities that make up Groupon. Groupon, Inc. is headquartered in the United States (Chicago, Illinois).

MyCityDeal Ltd sells vouchers for local and nation-wide services provided by third party merchants and facilitates reservation/booking of services directly. Groupon Shop Ltd makes available gift cards that can be purchased using MyCityDeal Ltd vouchers. Groupon



International Travel GmbH operates a hotel booking platform and sells vouchers for travel services provided by third party merchants. Groupon Goods Global GmbH operates a marketplace platform via which third party merchants can sell products directly to customers.

MERCHANTS AND SUPPLY CHAIN

Groupon's merchants, vendors, and suppliers (together, "**Merchants**")¹ include but are not limited to:

- Merchants for whose services or goods MyCityDeal Ltd sells vouchers;
- Merchants who sell goods directly to customers via the marketplace operated by Groupon Goods Global GmbH ("**Goods Merchants**");
- Merchants for whom Groupon International Travel GmbH sells vouchers or makes available other travel-related products; and
- Merchants who provide office-related operations (e.g., cleaning, catering, stationery, etc.)

DUE DILIGENCE AND RISK ASSESSMENT

Groupon takes a zero-tolerance approach as it relates to any potential slavery or human trafficking issues and undertakes risk assessments of all potential merchants, vendors, and suppliers as part of our initiative to identify and mitigate slavery and human trafficking occurring in our supply chain:

- All potential Goods Merchants undergo a vendor vetting process, during which we directly ask potential Merchants whether they "engage in child labour, slavery, forced labour and/or human trafficking" in our Groupon Vendor Vetting Questionnaire. We refuse to do business with potential Goods Merchants who do not complete the Groupon Vendor Vetting Questionnaire, or who respond that they engage in any or all of these practices. Our existing Goods Merchants must also complete the Goods Vendor Vetting Questionnaire on an annual basis to recertify their responses, including recertifying their response to the above-mentioned question. If a current Goods Merchant indicates during the annual recertification process that it has begun engaging in child labour, slavery, forced labour, and/or human trafficking, Groupon will cease doing business with this Goods Merchant;

¹ This does not include Groupon's supplier of digital gift cards, which are sold via the Groupon Shop Ltd. platform.



- We ask our Merchants to confirm in our agreements with them that they comply with all applicable international, federal, state, local, and other laws, which would include laws related to child labour, slavery, forced labour and/or human trafficking, as well as all applicable policies (specifically including the Global Vendor Code of Conduct described in further detail below). Further, the agreements issued by our UK entities specifically require each Merchant to warrant, represent, and undertake that “it complies with the UK Modern Slavery Act 2015 and any similar applicable legislation regarding modern slavery or human trafficking, and takes reasonable steps to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of its business”;
- Through our EMEA vendor portal, we notify our Merchants that “Groupon complies with the UK Modern Slavery Act 2015 (the ‘Act’) and any similar applicable legislation regarding modern slavery or human trafficking, and requires that all its business partners take reasonable steps to ensure that there is no modern slavery or human trafficking in their supply chains or in any part of their business. For more information, review [the Act](#) and Groupon’s [Vendor Code of Conduct](#)”; and
- We provide several methods for both employees and non-employees to report their concerns and/or complaints regarding possible modern slavery practices to Groupon’s Compliance Team, including by using our ethics hotline, EthicsPoint, which provides for making such a report anonymously. We make clear in our policies that employees who report their concerns or complaints regarding violations of applicable laws or policies in good faith shall not be penalised.

POLICIES

Vendor Code of Conduct

Groupon, Inc. has put in place a [Global Vendor Code of Conduct](#) (the “**Vendor Code**”) that sets out our requirements for all Merchants who do business with or on behalf of Groupon, Inc. This Vendor Code is displayed on all of the country-specific Groupon websites and is translated into our standard languages. It is also made binding on Merchants through our agreements with them.

The Vendor Code specifically states that Groupon, Inc. prohibits Merchants from engaging in child labour as well as any form of coerced labour such as slave labour, prison labour, indentured labour, bonded labour, and any other form of involuntary servitude. The Vendor Code also states that all Merchants are responsible for monitoring their global supply chains to ensure compliance with applicable coerced labour and human trafficking laws.



We also offer an informational video for our Merchants that outlines our policies for working together and shares the resources available to our Merchants through the Vendor Code. If Merchants have questions on the Vendor Code at any time, our Compliance team is available to support.

Anyone who has knowledge of an actual or potential violation of the Vendor Code is asked to make a report using the methods described in the Monitoring and Reporting section below.

UK Whistleblower Policy

Groupon's UK Whistleblower Policy, which pertains to all employees, contractors, consultants, and agency staff who work for Groupon in the UK, provides information about raising concerns and complaints, including those arising under or related to the Act, and provides methods for reporting such concerns and complaints, which are also detailed in the Monitoring and Reporting section below.

TRAINING

Groupon provides training to its employees regarding our Code of Conduct, which covers broader ethical and compliance issues, and the reporting mechanisms available to employees and non-employees to report concerns and complaints arising under or related to such issues. This training is provided to new employees at onboarding, and to all employees every two years thereafter. In alternate years, employees are required to complete a recertification quiz.

Going forward, our aim is to provide training that covers our policies and processes in place to combat slavery and human trafficking specifically and the reporting mechanisms available to employees and non-employees to report concerns and complaints arising under or related to the Act.

Groupon further makes available to all Merchants training regarding Groupon's Vendor Code, described above, which incorporates specific training regarding Groupon's zero-tolerance policy for unlawful labour and employment and health and safety practices, including any forms of child labour or coerced labour. The training also describes Groupon's available mechanisms for reporting concerns and complaints arising under or related to the Act.

MONITORING AND REPORTING



Concerns and complaints arising under or related to the Act should be reported to the Compliance Team at legalcompliance@groupon.com or via EthicsPoint at gr.pn/ethicspoint. EthicsPoint complaints may be made anonymously. The Compliance Team will promptly investigate any concerns and complaints arising under or related to the Act and/or the objectives set out in this Statement.

This joint statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Groupon's slavery and human trafficking statement for the financial year ended 31 December 2024. It has been approved by the MyCityDeal Ltd Board on 19 June 2024. It has been approved by the Groupon Shop Ltd Board on 17 June 2024. It has been approved by the Groupon International Travel GmbH Board on 17 June 2024. It has been approved by the Groupon Goods Global GmbH Board on 19 June 2024.

Sian Seabrooke

Authorized Signatory, MyCityDeal Ltd Board Member

Date: 19 June 2025

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Authorized Signatory, Groupon Shop Ltd Board Member

Date: 19 June 2025

Brian Heyel

Authorized Signatory, Groupon International Travel GmbH Board Member

Date: 19 June 2025

Gianluca Boscolo Cegion

Authorized Signatory, Groupon Goods Global GmbH Board Member

Date: 19 June 2025

Covering Financial Year 2024 (January - December)