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Modern Slavery Statement 2022

Introduction

This statement is prepared and published in accordance with section 54(1) of the Modern Slavery Act 2015 (the “**Act**”). It details the action taken by Jagex Limited (“**Jagex**”) to guard against modern slavery and human trafficking within its business and supply chains. This statement is made in relation to the financial year ending December 31st 2022.

Organisation Structure & Supply Chains

Jagex is a leading, community-driven, video game studio, developing and publishing video games on PC and mobile. Headquartered in Cambridge, UK, and employing over 400 people, Jagex is best-known for its online role-playing living game franchise *RuneScape*, which was launched over 20 years ago.

Jagex is ultimately owned by the US global investment firm, The Carlyle Group.

In the past 12 months, Jagex has acquired two overseas video game studios – Pipeworks, Inc., a US studio (July 2022), and Gamepires d.o.o, which is based in Croatia (December 2022).

Jagex, and its overseas subsidiaries, engage a number of external partners to support their business operations and IP distribution. This varies from video game service providers to catering services and from IT hardware suppliers to merchandise partners, with a host of other sectors represented elsewhere in the supply chain.

It continues to be the case that Jagex’s supply chains do not *obviously* include any areas identified as being at high risk of modern slavery. Notwithstanding, our staff – particularly those in procurement, licensing and outsourcing partner selection positions of responsibility – are



reminded of the importance of remaining vigilant and of abiding by the principles of our Supplier Code of Conduct, aimed at mitigating the potential for modern slavery or human trafficking to arise in our business and its supply chain.

Policies in relation to Slavery & Human Trafficking

Jagex continues to maintain a suite of policies, which are routinely reviewed and updated, and which are designed to reduce the risk of modern slavery and human trafficking. The current policies are:

- Anti-Slavery Policy
- Anti-Bribery & Corruption Policy
- Supplier Code of Conduct
- Whistleblowing Policy
- Bullying & Harassment Policy

Risk Assessment and Management

Suppliers

Jagex retains its zero-tolerance approach to modern slavery and human trafficking, as well as its policy of ensuring that when engaging suppliers on its own terms, those suppliers are required to sign up to the Jagex Supplier Code of Conduct (breach of which is a termination right in Jagex contracts).

The Supplier Code of Conduct mandates that suppliers must not support or engage any part of their supply chain in slavery or human trafficking. They are also required to ensure that staff have freedom to choose to terminate their employment arrangements. Suppliers must also comply with local laws and standards in relation to minimum working age, wages and working hours.

We consider prospective partners' own policies and procedures on these issues as part of our due diligence procurement processes, as



we continue to expect a shared commitment to ethical business behaviours from those that we work with.

Recruitment

Jagex recruitment and HR processes include pre-employment checks to ensure that prospective staff have the right to work in the UK. All employees are paid no less than the national living wage. The standard terms and conditions of employment for Jagex staff are drafted in accordance with applicable laws and this includes allowing employees to terminate their employment at any time on notice.

Employee Wellbeing

Jagex treats the health and wellbeing of its staff as a priority. Although covid restrictions have eased during the review period, Jagex remains a 'remote first' business, and as such, has maintained its focus on ensuring that its people feel supported and cared for, preserving the increased counselling / therapeutic coaching sessions and employee virtual 'pause and connect' events that were originally heightened during the prior 12 months. Jagex continues to provide access to private medical care and mental health support to its staff. It also undertakes its cycle of ongoing anonymous staff satisfaction surveys, the results of which continue to drive actions aimed at improving employee wellbeing and company culture.

Measures are taken to safeguard against abuse, coercion and other unacceptable behaviours in the workplace, through policies and procedures, including an Anti-Harassment & Bullying Policy and an Anti-bribery & Corruption Policy.

Progress Over the Past Year



Delivering on our commitment from last year's statement, we have raised internal awareness of learning and support resources available on sites such as Unseen (<https://www.unseenuk.org/>) and the Government Modern Slavery Training Resource Page, which includes the Home Office Modern Slavery Awareness Booklet. These training materials, and a suite of other reference resources, are available via our staff intranet to all employees (which now has a designated Modern Slavery page).

Whilst ongoing reviews of Jagex's supply chains and diligence in respect of existing and new suppliers over the last year has not resulted in an increased risk of modern slavery and human trafficking, this is nonetheless captured within our risk register framework as part of general legal and regulatory compliance processes and is reviewed as part of Jagex's ongoing enterprise risk management.

Looking Ahead

Over the next year, Jagex intends to supplement the learning materials already available to all our staff by exploring options to carry out designated training, particularly to those involved in the procurement process.

We will also consider updating and/or supplementing our existing processes and policies, where beneficial to bolster our commitment to strong business ethics. Jagex shall continue to monitor developments more broadly within its supply chain and industry sector, to identify further best practice examples and opportunities.

This statement was reviewed and approved by the Directors of Jagex Limited on 20 April 2023.

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Phil Mansell

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Signed: Phil Mansell

Director & CEO