

BALTIC CLASSIFIEDS GROUP PLC

Modern Slavery Statement

This statement is made by Baltic Classifieds Group PLC (“**BCG**” and together with its subsidiaries, the “**Group**”) in accordance with the requirements under section 54 of the Modern Slavery Act 2015 (the “**Act**”). It sets out our efforts to ensure that no slavery or human trafficking takes place in our supply chain or any other part of our business.

BCG is committed to acting in an ethical manner with integrity and transparency in all business dealings and to investing in the creation of effective systems and controls across the Group to safeguard against modern slavery and human trafficking.

Our business

BCG is proud to be the leading online classifieds group in the Baltics, owning and operating 14 online portals across a range of sectors and industries. Based on the number of user visits and the number of online listings across the group portals, BCG is foremost in the online classifieds market.

We consider using our portals as one of the easiest and safest ways to advertise and therefore transact real estate, auto, other items and to find a job, an employee or a service provider.

Our success is the result of a proactive and consumer-focused business model incorporating both vertical and generalist online portals. Our brands include vertical portals which serve particular industries and facilitate promotion, advertisement and sales

within specific sectors. These portals attract a high proportion of loyal and returning business customers (B2C listers who have a subscription-based contract). However, it is also highly used by individual customers and the general population (C2C listers carrying out one-off transactions). We also operate horizontal or generalist portals, such as general marketplace, online auction and price comparison websites, used by business customers and the general population.

Our structure

Baltic Classifieds Group PLC is the Group holding company. The Group’s headquarters are located in Vilnius, Lithuania, with employees spread across our offices in Lithuania, Estonia and Latvia. As of 30 April 2025, the Group had 167 employees (on a headcount basis).

BCG is listed on the London Stock Exchange since July 2021 and is a member of the FTSE 250 index.

Our supply chains

The Group’s supply contracts are principally digital-focused, with our main suppliers providing technology, marketing and professional services. There are also a small number of suppliers used to maintain and support business operations, for example, facilities management. The Group’s Business Partner Code of Conduct is fully implemented and encourages partners of the Group to act in accordance with generally accepted standards and internationally recognized human

rights and freedoms. You can read our Code of Conduct [here](#).

We carefully select suppliers who share our ethical standards and consistently deliver high-quality services. We pay them promptly and work closely with them to ensure a strong alignment of interests.

While the risk of modern slavery or human trafficking within our own operations is inherently low, we remain committed to ensuring that all of our suppliers uphold the same ethical principles. Wherever possible, we build long-term partnerships with preferred suppliers. We engage extensively with them before agreements are signed, throughout the contractual period, and at renewal, fostering transparency and trust.

Our supply chain is spread across several countries, with the largest concentration in the Baltic region. Supplier distribution is as follows:

- Lithuania (LT): 249 suppliers (36.35%)
- Estonia (EE): 198 suppliers (28.91%)
- Latvia (LV): 93 suppliers (13.58%)
- United Kingdom (GB): 39 suppliers (5.69%)
- United States (US): 35 suppliers (5.11%)
- Ireland (IE): 12 suppliers (1.75%)
- Germany (DE): 9 suppliers (1.31%)
- Sweden (SE): 4 suppliers (0.58%)

Due diligence processes

BCG's policy is to engage only with suppliers who meet our ethical standards. Potential suppliers are assessed based on their geographical location, nature of services provided and their reputation. The fact that the majority of our suppliers are based locally in the Baltic region aids this assessment process and provides confidence and transparency in our due diligence processes.

Despite the perceived low risk of modern slavery or human trafficking in our operations or supply chain we are committed nonetheless to ensuring that our suppliers adhere to the same ethical standards as we do.

Risk assessment and management

BCG conducted a comprehensive risk-based session and evaluated that modern slavery in its supply chain poses a remote risk.

As a specialist digital services business, our principal supply chains are not ones that would normally be associated with slavery or human trafficking.

We believe that the due diligence procedures adopted by BCG, and applied within the Group, to combat the risk of slavery and human trafficking within our business are proportionate to the identified risk of slavery and human trafficking affecting its business and the severity of this risk.

Policies in relation to slavery and human trafficking

To help achieve our aim that no modern slavery or human trafficking takes place within our supply chain or in any part of our business BCG

operates a number of group-wide policies to ensure that the Group as a whole is conducting business in an ethical and transparent manner.

BCG has adopted a Group-wide Whistleblowing Policy designed to provide our employees with an effective and available mechanism to help prevent malpractice occurring across our working environment. The Group also has adopted Employee's Code of Conduct which outlines the basic principles and ethical standards for the BCG and all employees' to obey and respect.

Effectiveness

During the reporting period, no incidents or reports of modern slavery or human trafficking were identified within the Group's operations or supply chain. To support ongoing compliance with the Modern Slavery Act 2015 and strengthen our risk management processes, our key targets include: (i) maintaining an effective mechanism for investigating any concerns related to modern slavery, should they arise; (ii) upholding our commitment to responsible employment practices, including alignment with living wage principles where applicable; (iii) continuing the implementation of our supplier due diligence practices; (iv) periodically reviewing the effectiveness of this framework; and (v) reviewing the modern slavery statements of key suppliers and, if and where necessary, requesting further evidence of their compliance with the Act.

Training

Our employees are briefed on all Group policies when they join BCG. Policies are maintained in our online

employee portal and updated for signing by employees on induction and subsequently when approved by the Board. We provide our policies and this statement to our customers and suppliers on request.

BCG holds employee briefings throughout the year to provide business updates, information and training on numerous topics including our policies.

Further steps and action

The Group is committed to continually addressing the potential risks of modern slavery and human rights abuses within the Group and in its supply chain and we will continue to take steps to review and, where appropriate, further improve our processes to ensure that we mitigate these risks appropriately. Should any instances of modern slavery be identified, we believe the Group is well positioned to deal with and address these.

Approval

The statement has been reviewed and approved by BCG's Board of Directors on 23 September 2025 and signed on its behalf by:

Justinas Šimkus

Chief Executive Officer
Baltic Classifieds Group PLC

24 September 2025