

# 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 and organisation structure

BCG is proud to be the leading online classifieds group in the Baltics, owning and operating 12 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. In 2022, the Group's portals were visited on average 65.11 million times per month which means that on average a resident in the Baltics visits one of our sites 11 times every month.

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

The Group's headquarters are located in Vilnius, Lithuania with employees spread across our offices in Lithuania, Estonia and Latvia. As of 30 April 2022, the Group had 140 employees (on a headcount basis).

### 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 nature of our business is that we provide online spaces for third parties to promote, advertise and sell goods and services. Whilst the Group is removed from and not responsible for the third party sellers using its platforms, the Group does encourage high ethical standards through the terms of its subscription contracts.

### 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 will be carrying out a detailed risk-based session in the Autumn of 2022 which will consider the risks of modern slavery in its supply chain. Our current position is that these risks are low.

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 an employee handbook to ensure a consistent standard of behaviours across the Group and which includes an Anti-Bribery and Corruption Policy (among other policies).

These policies and our employee handbook are distributed to all employees.

## Training

Our employees are briefed on all Group policies and our employee handbook 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.

During the year ahead we will be paying particular focus on risk assessment of supply chain and supplier due diligence.

## Approval

The statement has been reviewed and approved by BCG's Board of Directors on 6 July 2022 and signed on its behalf by:

*Justinas Šimkus*

Chief Executive Officer, Baltic Classifieds Group PLC  
6 July 2022