

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.

Our business

The Group is the leading online classifieds group in the Baltics (based on the number of visits and listings), which owns and operates 12 leading vertical and generalist online classifieds portals in Estonia, Latvia and Lithuania. The Group’s online classifieds portfolio comprises eight vertical online classifieds portals, including vertical portals for automotive, real estate and jobs and services, and four generalist portals, offering a wide range of products.

The Group’s headquarters are located in Vilnius, Lithuania. As of 30 April 2021, the Group had 124 full-time employees, with an average tenure of approximately six years for those based in Lithuania, and a leadership team with an average approximate tenure of 12 years. The Group’s employees are spread across our offices in Lithuania, Estonia and Latvia. The Group manages its recruitment process in-house and organises a yearly performance review.

Risk Assessment

BCG has examined the risk of modern slavery within its business operations on a risk-based approach and considers the risks of modern slavery in its supply chain to be low.

The assessment is based upon the fact that the Group is a digital services business, it is not involved in any manufacturing activities and that the Group’s supply contracts are principally digital-focused, with our main suppliers providing technology, marketing and professional services.

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.

Compliance Policies and Training

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’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 in the Baltic region aids this assessment process. 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.

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 its Mission Statement and Values and an Anti-Bribery and Corruption Policy (among other policies). BCG requires all third-party intermediaries to comply with the Anti-Bribery and Corruption Policy, which is intended to limit the risk of any malpractice or any unprofessional or unacceptable behaviour occurring across the Group’s supply chain.

These policies and our employee handbook are distributed to all employees, and the Group intends to implement a training programme in due course.

The implementation and effectiveness of the Group's compliance function and policies is reviewed periodically by the Audit Committee and is supported by periodic reviews and risk assessments performed by the Group's finance and legal teams.

Further Steps and Action

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 adverse human rights impacts.

In particular, we are committed to addressing the potential risks of modern slavery and human rights abuses within the Group and in its supply chain and we will 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 21 June 2021 and signed on its behalf by:



Justinas Šimkus

Chief Executive Officer, Baltic Classifieds Group PLC