

## Modern Slavery Act Transparency Statement

### Introduction

We, LBG Media plc and our group companies (the **Group**), are one of the biggest social publishers in the world with a global audience approaching a billion operating across all major social platforms and our websites.

As a leading social youth publisher, we are aware that we have a powerful global platform to push a socially responsible agenda, represent our audience and enable those that do not have equal opportunities to have their voices heard. This is shown in our mission statement: to give the youth generation a voice by building communities that laugh, think and act. The Group has been widely recognised across the industry for its impactful and perception changing campaigns. Further details on our business model and how the Group recognises the importance of being an environmentally and socially responsible business, can be found within the [LBG Media plc annual report and accounts for the year ended 31 December 2021](#).

We are committed to improving our practices to combat slavery and human trafficking anywhere within our business and supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's, slavery and human trafficking statement for the financial year ended 31 December 2021.

### Organisation structure

LBG Media plc is the ultimate parent company of the Group and each of its wholly owned subsidiaries listed below. The Group operates in the UK, Ireland, Australia, and New Zealand, and has a global annual turnover of over £50 million.

- LBG Holdco Limited
- LADbible Group Limited
- Studio Joyride Limited
- FOODbible Limited
- CONTENTbible Limited
- GAMINGbible Limited
- Pretty52 Limited
- LASSbible Limited
- ODDSbible Limited
- SPORTbible Limited
- LADbible Limited
- UNILAD Group Limited
- LADbible Australia Pty Limited
- LADbible New Zealand Limited
- LADbible Ireland Limited
- LADbible US Inc.

## **Supply chains**

Our suppliers include freelancers (providing us with content), event management companies, large and small technology and software suppliers, IT and other office equipment, branded merchandise services, professional services, and office cleaning and other office facilities services. In March 2022, the Group launched its first ever commerce product, the First Impressions card game, which introduced a UK-based manufacturer to our supply chain.

The Group is not aware of any slavery or human trafficking in any part of its business or supply chain and no such issues were raised during the financial year ended 31 December 2021. The Board has overall responsibility for risk management which is reviewed regularly to ensure mitigating actions are in place. The risk of slavery or human trafficking in any part of its business or supply chain, is considered low and not a principal risk of the Group.

## **Steps taken to combat slavery and human trafficking**

We have measures in place to identify, assess, mitigate and monitor the risk of slavery and human trafficking in our supply chains, as follows:

- Across all jurisdictions in which the Group operates, each supplier is subject to a supplier onboarding process, which acts as both a due diligence and compliance tool for the Group. This process is being phased in for all new suppliers at the commencement of trading with the Group or for existing suppliers at a renewal stage of the relevant contract with the Group.
- In the onboarding process, our suppliers are requested to adhere to our standard Supplier Terms and Conditions (Supplier Ts&Cs) or alternative contractual terms are negotiated, subject to legal review. The Supplier Ts&Cs contain anti-slavery and human trafficking provisions, anti-bribery and anti-corruption provisions and more generally, provisions relating to complying with all applicable laws and regulations.
- The Supplier Ts&Cs contain notification requirements in the event that a supplier becomes aware of any actual or suspected breach of anti-slavery and human trafficking (and anti-bribery, anti-corruption) laws and regulations. The Supplier Ts&Cs also oblige our suppliers to contract with their subcontractors on a similarly onerous contractual basis. The Group reserves its right to immediately terminate the relevant supplier contract in the event of a breach of these provisions and to inspect/request (if required) a supplier's premises/records of compliance.
- If a supplier has not signed up to the Supplier Ts&Cs, the supplier would be subject to a separate negotiated agreement with the relevant entity in the Group. Each such contract would contain general provisions relating to complying with all applicable laws and regulations, anti-slavery and human trafficking provisions, anti-bribery and anti-corruption provisions. Particularly for suppliers representing a higher risk or vulnerability to slavery and human trafficking in their business or supply chains, the Group would assess this by reference to the sector/industry in which they operate (for example, manufacturing/commerce), the location they operate in and the type of

supplier and their relation to the Group (for example, transaction/business risk assessment and a product/materials risk assessment). The in-house legal, finance and compliance teams would be involved in relation to such 'higher risk' contract negotiations and supplier due diligence and would seek specialist assistance if required.

- The Directors of LBG Media plc support a high standard of corporate governance and have complied with the QCA Code from admission of LBG Media plc on the London Stock Exchange's Alternative Investment Market in December 2021. The Directors believe that the QCA Code provides the Group with a framework to ensure that the right standards of governance are established, enabling a strong governance culture to be embedded as part of building a successful and sustainable business for all of the Group's stakeholders. Principles 3 and 4 of the QCA Code provide that the Board: (i) must take into account wider stakeholder and social responsibilities and their implications for long-term success and (ii) embed effective risk management, considering both opportunities and threats, throughout the organisation. Further details of the Group's compliance with the QCA code and the Board's robust assessment of the principal and emerging risks to the LBG Media Group can be found in the [LBG Media plc annual report and accounts for the year ended 31 December 2021](#).
- The Group has appropriate policies in place that underpin our commitment to a sustainable and responsible business. These policies are continuously reviewed and updated, and set out in the employee handbook, which is provided to all employees. The policies and the handbook more generally are designed to ensure that all staff conduct the business in an honest, fair, transparent, and ethical manner and to protect whistleblowers.

The Group shall continually undertake due diligence and monitor the risks of modern slavery and human trafficking in its supply chains and business, implement measures internally and externally, to the extent necessary, to tackle any risk of slavery and human trafficking.

### **Approval**

This statement was approved by the Board of Directors of LBG Media plc on 8 July 2022.

**Alexander Solomou**  
**Chief Executive Officer**  
**on behalf of the Group**  
Date: 8 July 2022