GBG

Modern Slavery Statement

July 2023

Introduction

This statement sets out the steps GBG has taken to address and mitigate the risk of slavery, human trafficking and child labour taking place in our supply chains or in any part of our business. We recognise that all businesses have a key role to play in preventing all types of modern slavery in their own business and supply chains through the promotion of ethical business practices and policies. We are continually considering ways of maximising positive societal contributions of both our own business and that of the companies we work with. We believe it is our ability to establish trust between businesses and their customers that places us at the heart of the global digital economy. Our customers need innovative digital solutions to grow, reduce online fraud and meet increasingly stringent compliance regulations. GBG offers practical solutions and tools to enable organisations to engender trust with their customers, help them to mitigate ethical risk within their own business and keep principled practices at the heart of their business models.

At GBG, we are committed to improving our policies and practices to understand the risk and address the risk and address modern slavery, labour exploitation and human trafficking within our operations and supply chains. Due to the nature of our services, we believe the risk of modern slavery in our supply chains is low, however, we are not complacent and will continue to focus on improving our procedures and policies to ensure that there is no modern slavery in GBG's supply chains. We expect the same commitment from our suppliers, contractors and business partners.

Globally there are nearly 50 million victims of modern slavery in the world today (According to the International Labour Organisation, Walk Free Foundation and International Organisation for Migration). Modern slavery is an umbrella term used to describe the illegal exploitation of others for personal or commercial gain. There are various forms of modern slavery, these are known as:

- Forced labour
- Bonded labour
- Sexual exploitation
- Domestic servitude
- Human trafficking

GBG's organisational structure

GB Group Plc ('GBG') is a global business, listed on the UK AIM market, with over 1,200 team members and operations across Europe, North America, South America and Asia Pacific. Our products combine an unparalleled breadth of data from over 150 global partners. GBG exists to build trust in the digital world and our future is all about creating a world full of confidence. We do that by facilitating online environments where everyone can transact with the complete and unconditional confidence they expect.

Our Chief Financial Officer is the senior leader with oversight for our approach to modern slavery and is supported by the Director, ESG Programme.

Our business

GBG was founded in 1989 and has grown through organic growth and acquisitions since then, which are all reported under the GBG brand globally. Together, we provide business solutions aimed at informing decisions about customers in key areas:

Location – facilitating the registration of identity data, such as name and address, contact information and social network IDs, quickly and with minimum impact on the customer experience. GBG's technology confirms and locates the people our clients need to connect with.

Identity – providing more innovative ways of confirming identity than simply relying on credit data. Our solutions check the identities of more than 4 billion people worldwide and also verify citizens of the world's largest economies to the rigorous standards set by the world's financial regulators. Our solution is designed to help prevent fraud and avoid regulatory fines, our powerful identity verification solutions can be configured to carry out a wide range of functions, including Know Your Customer (KYC) Checks, Anti Money Laundering (AML) Checks, fraud protection and age verification checks.

Fraud Detection & Compliance – fraud prevention solutions not only check new customer details in real time as they register but monitor and detect application and transaction fraud on an ongoing basis. Our advanced capabilities, data intelligence and comprehensive ecosystem of best-in-class risk managers enables businesses to stay vigilant amid the acceleration of digital adoption and financial crime. Our end-to-end fraud and compliance solutions provide multi-layered protection against synthetic identity fraud, first-party fraud detection, account takeovers, social engineering, money mule crimes, money laundering, terrorist financing, and more.

Our supply chains

Although human rights violations are illegal in every country in the modern world it unfortunately still exists and is a brutal form of organised crime whereby people are forced to work against their will under the threat of some form of punishment or detriment. Most of these people are in the supply chains of legitimate industries. We spend £100M+ globally per annum with our key suppliers and partners.

Our policies on slavery and human trafficking

The Board takes ultimate responsibility for ensuring we comply with our legal and ethical obligations. All Executive Team members are responsible for ensuring their teams understand and comply with the requirements and know how to raise areas of concern. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

As part of our commitment to combating modern slavery, GBG has in place a number of internal policies on matters such as our Code of Conduct, Supplier Code of Conduct, Anti-

Corruption and Anti-Bribery, and Whistleblowing which are readily available to all team members via GBG's internal intranet.

Our Code of Conduct sets out what our team members can expect from us and what we expect from them in relation to modern slavery. Our Supplier Code of Conduct demonstrates our commitment to improving our practices to on human rights within our supply chains.

As part of GBG's whistleblowing processes, we encourage team members to raise any concerns and provide clear reporting lines. We have an external whistleblowing hotline which allows team members to report in confidence wherever in the world they are located and monthly reports are provided to Company Secretary, who directly reports to the Chair of the Audit & Risk Committee on such matters. At the time of publication, no concerns regarding slavery or human trafficking have been raised.

Risk in the supply chain

GBG has an enterprise-wide risk management approach which is described in the GBG Risk Management Framework document. This Board-owned framework sets the standards and expectations of how risks are identified and managed by GBG.

Risk assessment is a core part of our Due Diligence processes, as described below.

The treatment of ESG risk is embedded within the risk framework. ESG risk is recognised and managed as a strategic risk for GBG and are identified and assessed using the same process outlined in the GBG Risk Management Framework. The risk of a breach of human rights or failure to meet modern slavery requirements in our operations or supply chain is included in our ESG risk register to ensure the risk level is reviewed at least annually.

Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking and the company will continue to protect whistleblowers.

Due diligence

As part of our due diligence processes into slavery and human trafficking our supply chain approval process incorporates a review of the controls undertaken by the supplier or partner.

GBG minimum expectations of its supply chain:

- No forced, bonded or involuntary prison labour or child labour;
- Workers have rights to join or form trade unions and rights for free association and bargaining;
- Working conditions are clean, safe and hygienic;
- Working hours comply with national laws and benchmark industry standards;

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

As we develop our thinking around modern slavery, we will continue to update our procurement and governance processes to ensure compliance to both legal requirements and industry best practice. This includes the ongoing development and improvement of our formal supply chain due diligence process.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we circulate and share our Modern Slavery statement with team members annually. In addition all new starters are required to review and confirm their understanding of our Modern Slavery statement as part of their online induction process.

Effectiveness

We recognise that the fight against modern slavery is not static. Therefore, to improve our mitigation and to ensure we can demonstrate our continued commitment to eradicating slavery and human trafficking from our supply chains we will continue to monitor and modify our approach.

One of the key ways we are doing this is through partnering with the Slave-Free Alliance to help us create and adapt the structures and processes needed to improve our approach systematically. Together we have performed a gap analysis to identify opportunities to strengthen our commitment and the strategy needed to deliver on these. We will also continue to take the following steps:

- Improve team member awareness on modern slavery through updated training.
- Review our procurement strategy for GBG, to ensure appropriate processes and sufficient control over who we spend our money with and the due diligence required prior to placing orders.
- Ensure suppliers support GBG's principals as set out in its Modern Slavery Statement and that they comply with applicable legislation and regulatory requirements.
- As part of the onboarding process of new suppliers, our standard Terms and Condition include strong obligations regarding compliance with Modern Slavery legislation.
- Instances of non-compliance are assessed on a case-by-case basis and any remedial actions are tailored appropriately.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2023. The statement has been approved by the Board of GB Group Plc on [DATE] and signed by David Ward, CFO of GB Group Plc, on 10 July 2023.



GB Group Plc

10 July 2023