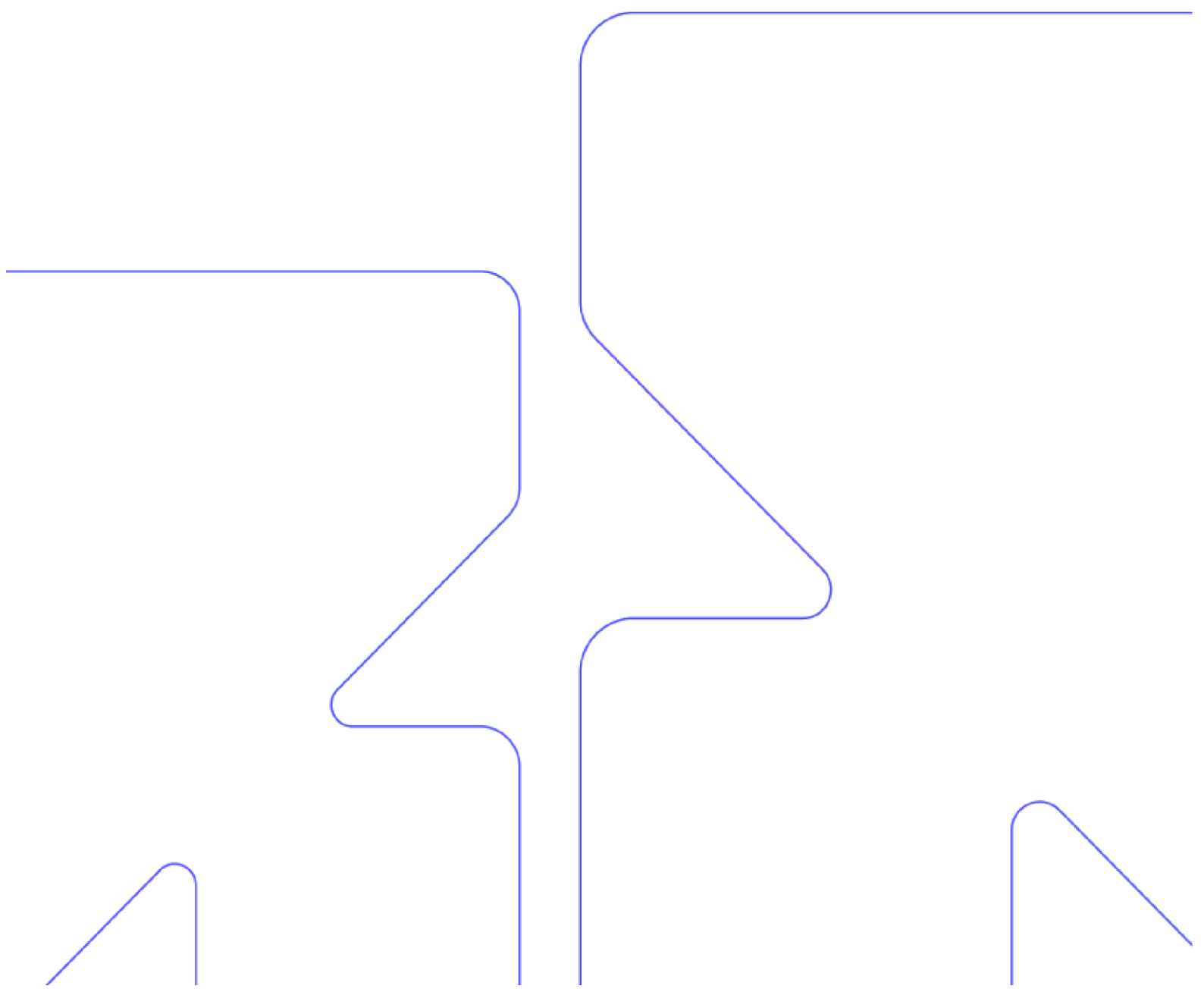


MODERN SLAVERY STATEMENT 2026

July 2026



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 responsibility to establish trust between businesses and their customers, which 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 build 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 and address the risk of 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 operations and supply chains is relatively low. However, we are not complacent and will continue to focus on improving our procedures and policies to identify, assess and address the risk of modern slavery within GBG's operations and 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.

Modern slavery can take a number of forms, including:

- 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 Main Market of the London Stock Exchange, with over 1,000 team members and operations across Europe, North America, South America and Asia Pacific. Our purpose is to enable safe and rewarding digital lives for genuine people, everywhere.

Our Chief Financial Officer (CFO) retains executive responsibility for our modern slavery approach, supported by the Group Company Secretary and Head of Impact and Sustainability. Modern slavery risks and mitigation actions are reviewed annually at Board level to support accountability and continuous improvement.

Our supply chains

Modern slavery can occur in the supply chains of legitimate businesses across a wide range of sectors and geographies. We recognise that, as a global business, we have a responsibility to understand and address the risk of modern slavery within our operations and supply chain.

GBG spends more than £100 million annually with suppliers and business partners globally. Our supplier base includes data providers, technology vendors, software and infrastructure providers, and professional services organisations. The majority of our Tier 1 suppliers are based in jurisdictions generally considered to present a lower risk of modern slavery; however, we recognise that risks can exist at all levels of the supply chain, particularly beyond direct supplier relationships.

To strengthen our understanding of these risks, we continue to enhance our supplier due diligence processes and improve visibility of our wider supply chain. This includes ongoing work to map Tier 2 and Tier 3 suppliers where appropriate, enabling us to better assess potential risk exposure and target engagement activities. We intend to provide additional information on the composition of our supply chain in future statements to support greater transparency.

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 several internal policies on matters such as our Team Member 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 Team Member 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 promoting respect for human rights and responsible business practices throughout 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, GBG has not received any substantiated reports relating to modern slavery or human trafficking within its operations or supply chain.

Risk in the supply chain

GBG has an enterprise-wide risk management approach which is described in the GBG Risk Management Framework. This Board-owned framework sets the standards and expectations of how risks are identified and managed by GBG. GBG uses a structured risk assessment methodology that considers supplier geography, industry sector, and service criticality. ESG risks, including modern slavery-related risks, are reviewed periodically through our risk management processes and integrated into our Group risk register.

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

The treatment of ESG risk is embedded within the Group 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.

Certain goods and services sourced from higher-risk jurisdictions may present an elevated risk of modern slavery and human rights abuses. 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 relating to modern slavery and human trafficking, our supplier onboarding and approval processes incorporate a review of the controls and policies maintained by suppliers and partners, where appropriate.

GBG's minimum expectations of its suppliers include:

- 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 GBG's Team Member Code of Conduct, which includes our expectations regarding modern slavery, as part of their online induction process.

We have also introduced mandatory company-wide modern slavery awareness training for all team members. The training covers what modern slavery is, how to identify potential indicators and warning signs, and the appropriate steps to take if concerns are identified or suspected. This helps ensure that team members understand their role in identifying and reporting potential issues within our business and supply chain.

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.

We will take the following steps:

- Improve team member awareness on Modern Slavery through mandatory training.
- Review our procurement strategy, to ensure appropriate processes and sufficient controls are in place
- Ensure suppliers support GBG's principals as set out in this Modern Slavery Statement and that they comply with applicable legislation and regulatory requirements.
- As part of the onboarding process for new suppliers, our standard Terms and Conditions and Supplier Code of Conduct include obligations relating to compliance with applicable 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 2026. During FY26, no substantiated incidents of modern slavery were identified within GBG's operations. The statement was approved by the Board of GB Group Plc on 21 July 2026 and signed on its behalf by David Ward, Chief Financial Officer.



David Ward

Chief Financial Officer

Changelog

Agreed & Implemented:	September 2016
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Version	Date	Reason for Change	Approved By
9.0	July 2025	Annual review & start of embedded changelog	Annabelle Burton
10.0	July 2026	Annual review, updated training	Annabelle Burton