

JAGEX

Modern Slavery Statement 2025

Introduction

This statement is prepared and published in accordance with section 54(1) of the Modern Slavery Act 2015 (the “**Act**”). It details the action taken by Jagex Limited (“**Jagex**”) to guard against modern slavery and human trafficking within its business and supply chains. This statement is made in relation to the financial year ending 31 December 2025.

Previous Modern Slavery statements have covered Jagex’s former overseas subsidiaries, Pipeworks, Inc. (“**Pipeworks**”) in the USA and Gamepires d.o.o. (“**Gamepires**”) in Croatia.

Pipeworks was divested by Jagex on 30 May 2025 and Gamepires was divested by Jagex on 15 December 2025. As a result, this and future Modern Slavery Statements will not include Pipeworks or Gamepires.

This statement also takes account of the Home Office Statutory Guidance ‘*Transparency in supply chains: a practical guide*’, last updated 1 December 2025.

Organisation Structure & Supply Chains

Jagex is a leading, community-driven, video game studio, developing and publishing video games on PC and mobile. Headquartered in Cambridge, UK, and employing around 500 people, Jagex is best-known for its massively multiplayer online role-playing game franchise *RuneScape*, which was launched 25 years ago.

With the nature of Jagex’s activities, business is conducted around the world. As video game developers and publishers, our customers – the players of our games – are located throughout the world, with player and supplier concentration principally focused on the United States and Europe.

Jagex does not produce physical products and instead supplies digital goods to its users in the form of video game content. Jagex does, however, offer licensed merchandise, including during the reporting period through a partnership with UK-based merchandise supplier Backstreet International Merchandise Limited, together with other licensed partners, who are subject to the same sourcing and onboarding processes as other suppliers.

Jagex mainly provides these digital goods and associated services via a direct workforce of employees and individual contractors. It complements its direct workforce through engagement of external partners to support business operations and IP distribution. These partners are unsurprisingly technology focused, including software and IT hardware suppliers, but also include video game service providers for outsourced support in particular disciplines.

The Jagex Procurement, Commercial, Legal, People & Culture, Finance and Cyber Security teams are involved in the sourcing and onboarding of supply chain partners (depending on the nature of these) and are day-to-day custodians of modern slavery risk management governance. Ultimate responsibility for oversight and management rests with the Executive Team and Board.

Policies in relation to Slavery & Human Trafficking

Jagex maintains, reviews and updates, as necessary (typically every 12-24 months) its suite of policies designed to reduce the risk of modern slavery and human trafficking. These policies are available to all staff via the Jagex HR Information System and include the following:

- Anti-Slavery Policy
- Anti-Bribery & Corruption Policy
- Supplier Code of Conduct
- Employee Code of Conduct (updated following reporting period)
- Whistleblowing Policy
- Bullying & Harassment Policy (updated following reporting period)
- Sanctions, AML & Counter Terrorist Financing Policy

Policies at Jagex are formulated and reviewed by a cross-section of the relevant areas of the business, including (but not necessarily limited to) internal and external Legal, People & Culture, Procurement, Communications as well as Senior Leadership and Executive Team members. Policies are disseminated to the workforce via a combination of communication channels such as Slack and staff email notifications and are stored and readily available through centralised HR Information Systems or Intranets.

For external facing policies, such as the Jagex Supplier Code of Conduct, this is appended to our supplier contracts and partners we work with, when contracting on Jagex terms, are then bound to abide by these provisions and obligations. In the event that suppliers breach such policies, Jagex has a right to terminate the contract immediately. Suppliers are contractually obliged to comply with all applicable laws, statutes, regulations and codes relating to labour, anti-slavery and human trafficking laws, including the Modern Slavery Act 2015, but also a wider suite of compliance commitments, including under the Bribery Act 2010 and Criminal Finances Act 2017. Jagex has utilised these commitments in recent years to resolve concerns that have arisen based on internal diligence and investigations, and Jagex has exercised its right to terminate where its concerns were not capable of being addressed.

We also consider actual and prospective partners' own policies and procedures on these issues as part of our due diligence and procurement processes, as we continue to expect a shared commitment to ethical business behaviours from those that we work with. In addition, for certain partners, such as Microsoft, we are mandated to complete specific compliance training and certification processes to preserve our working relationship with such partners. These requirements also provide reassurance that Jagex is partnering with reputable entities which share our commitment to ethical business practice.

Assessing and Managing Risk

Jagex's supply chains do not obviously include any areas identified as being at high risk of modern slavery (in both industry and location contexts). Moreover, as noted previously, Jagex's supply chains are not complex or large. The nature of Jagex's workforce also does not have high risk characteristics (such as a reliance on low-skilled labour, or seasonal labour). No incidents of modern slavery have been identified across Jagex's operations and supply chains in 2025. Despite this,

Jagex maintains a zero-tolerance approach to modern slavery and human trafficking and a vigilance and mindfulness in this regard, conscious of the evolving nature of modern slavery risks. Jagex has issued modern slavery training in the reporting year to its staff in order to reinforce this understanding and awareness.

Jagex appointed a Director of Procurement in 2025, who has since centralised Jagex's procurement operations. As part of this process, a desktop assessment of all suppliers to Jagex has been undertaken through Jagex's Canopy portal, a centralised procurement system for supplier management, with modern slavery comprising part of that assessment.

A centralised Procurement Policy has been developed as part of this process, and underlying processes, procedures and practices (including purchasing practices) have been reviewed. The principles of the base toolkit of the Responsible Sourcing Tool (which in-turn is aligned with the UN Guiding Principles on Business and Human Rights, and the OECD Due Diligence Guidance for Responsible Business Conduct) are respected and observed.

Current due diligence processes are rooted in ensuring that Supplier Code of Conduct requirements are met. The Code mandates that suppliers must not support or engage any part of their supply chain in slavery or human trafficking. They are also required to ensure that staff have freedom to choose to terminate their employment arrangements. Suppliers must also comply with local laws and standards in relation to minimum working age, wages and working hours.

All new suppliers are onboarded through Jagex's procurement system, Canopy. As part of the Canopy onboarding process, all suppliers are required to sign Jagex's Supplier Code of Conduct and Jagex's Modern Day Slavery Policy. Suppliers are also asked to declare whether they operate in a labour-heavy, low to minimum wage industry (such as construction, cleaning services, security or warehousing). Where a supplier answers affirmatively to this question, Jagex requests a copy of the supplier's own modern slavery policy and reviews that policy before permitting the relevant business area to engage with that supplier.

Jagex manages modern slavery risk through its Enterprise Risk Management framework and supplier oversight processes. Risks relating to labour practices, human rights, and supplier conduct are identified, assessed and monitored on an ongoing basis. Risks are assigned owners, reviewed regularly and escalated through appropriate governance forums where required. Emerging risks within our supply chain are also considered as part of our wider risk management activities.

Jagex recruitment and HR processes include pre-employment checks to ensure that prospective staff have the right to work in the UK. All employees are paid no less than the national living wage. Jagex standard employment terms and conditions are drafted in accordance with applicable laws, which includes allowing employees to terminate their employment at any time on notice.

Training

During 2025 (and repeated thereafter, to capture any new joiners to the business), Jagex issued online training to internal stakeholders to support its response to modern slavery. Jagex continues to provide this training through a training provider, KnowBe4, as part of wider compliance (e.g. Anti-Bribery and Corruption) and cybersecurity training delivered during the reporting year.

A designated, stand-alone module on Modern Slavery was provided to all staff. The module explained the requirements for employees under the Modern Slavery Act, helping them become fully aware of the types, scope and size of the problem of modern slavery. It also covered how to report it (tied to the company policy) and what is required to ensure the organisation complies with the Act. The module tested participants' awareness through knowledge checks as the e-learning module developed and concluded with a quiz.

In addition, awareness-raising materials are published on the Legal Team pages of the company's remote-friendly team workspace site. These include the Home Office "*Modern slavery training: resource page*" (last updated 11 June 2026) and the Walk Free website and resources, including its Global Slavery Index.

As mentioned above, Microsoft requires its partners to complete training and certification requirements in order to preserve partner status. As such, during the reporting period, certain individuals have completed compliance training modules developed by Microsoft.

Monitoring and Evaluation

In monitoring and evaluating the commitments of, and outputs arising from, last year's statement, the following have been achieved:

- Jagex has delivered modern slavery specific e-learning training to its entire workforce.
- Procurement due diligence processes have been refined and strengthened through the implementation of Canopy, with a requirement for all suppliers to sign the Supplier Code of Conduct and Jagex's Modern Day Slavery Policy and to declare whether they operate in a labour-heavy, low to minimum wage industry.

Looking ahead to 2026 goals, Jagex will continue to:

1. Increase the awareness and understanding of modern slavery, and the Anti-Slavery Policies across the Jagex's workforce, assessed by:
 - a. the percentage of Jagex staff who complete modern slavery training within 30 days of joining the organisation; and
 - b. the number of communications and initiatives pertaining to this subject matter across the calendar year within Jagex.
2. Improve the ability to identify modern slavery, particularly in our supply chains and increase the understanding of the modern slavery risk, assessed by:

- a. gathering via Canopy updated information on supplier location, ownership structure, use of subcontractors, and sourcing of materials or labour from high-risk geographies; and
- b. reviewing the feasibility and impact of targeted supplier audits within higher-risk categories. This will include:
 - i. Desktop-based risk assessments ;
 - ii. Ethical self-assessments or SAQs (supplier assurance questionnaires); and
 - iii. Engagement of third parties to conduct independent assessments or audits (where appropriate).

These assessments will inform our due diligence and enable proportionate responses where concerns arise.

This statement was reviewed and approved by the Directors of Jagex Limited on 30 June 2026.

Signed: Kevin Allington

Director & Chief Operating Officer