



**XLMedia plc  
Modern Slavery Statement 2024**

## Scope

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 ('the Act') and sets out the steps which XLMedia plc ('XLM') has taken during the financial year ending 31 December 2023 and has planned for 2024 to prevent modern slavery and human trafficking from occurring in XLM's business operations and supply chains.

This statement is made on behalf of XLM who is required to report under the Act.

## Business Overview

XLM is a leading global digital media business which creates compelling content for highly engaged audiences and connects them to relevant advertisers. XLM and its subsidiaries (the 'Group') owns and operates some 20 premium branded marquee websites across various sectors, including sports and gaming. Headquartered in the United Kingdom, with significant presence in the United States of America, XLM's group employs over 150 people worldwide. XLM has a track record of success in digital media and performance marketing, working with some of the world's largest advertisers. We operate in regulated territories with the priority in high growth markets in North America and Europe.

The Group's revenue is driven by highly engaged, returning audiences that attract high-value advertisers. We develop premium brands that build trust and loyalty among their audiences. We extend this relationship to trusted advertisers and partners who enrich the consumer experience while generating revenue.

The Group is now an industry leader in partnering with media businesses. In its operations, the Group's supply chain primarily consists of software, technology, and technology infrastructure products and services as well as professional advisory and support services.

## Our Commitment

At XLM we recognise that modern slavery is a global crime and a violation of fundamental human rights.

The Group are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Each person working for the Group, or on our or their behalf in any capacity has the responsibility to uphold the principles set out in this statement in addition to complying with the Group's Modern Slavery Policy, a copy of which can be found on XLM's website and XLM's intranet.

## Governance and Due Diligence

We invest time to put into place the appropriate processes, policies and governance structures that guide us in our activities. We recognize that modern slavery is complex and can manifest itself in a variety of ways and therefore requires a holistic approach to prevention.



XLM's board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those in XLM's service comply with it.

The Group Chief Financial Officer ('CFO') has primary and day-to-day responsibility for implementing XLM's Modern Slavery Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

XLM has a Whistleblowing Policy to ensure that all employees and contractors can identify and report any concerns that they may have without fear of suffering any detrimental treatment. A specific secure e-mail address manned by a select number of senior legal and HR personnel has been set up internally to deal with any issues raised. A copy of the Whistleblowing Policy can be found on XLM's intranet.

All employees and contractors are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. These concerns can be raised by notifying the CFO directly or through the Whistleblowing reporting channel set out within the Whistleblowing Policy.

In 2024, the standard terms and conditions within our contracts will continue to be reviewed and updated to require our customers, suppliers and other business partners to continue to act in accordance with the Act.

XLM will continue to review the effectiveness of its approach in 2024.

## **Risk Assessments**

XLM conducts its business fully online operating out of Canada, Cyprus, Israel, the United Kingdom and the United States of America, all of which are generally at low risk of modern slavery. Most of the procurement spend is in skilled sectors with a similarly low-risk profile. XLM ensures that all relevant employment legislation is adhered to in the jurisdictions where we have employees and contractors. Consideration is given to modern slavery risks in other aspects of the supply chains for goods and services that the Group acquires.

## **Training**

As noted above, XLM has made this statement and the global Modern Slavery Policy available to its employees and stakeholders on the XLM website and the XLM intranet. Group policy updates are communicated to all employees via the HR team internal channels.

Any material, legal, operational or reputational issues can be reported via the secure internal Whistleblowing e-mail address, which, as noted above, is available to all employees and contractors, globally.

Processes are in place to manage any relevant risk in our recruitment processes which, if identified, would be escalated and addressed accordingly.



In 2024, to increase awareness and understanding of the Act and the Modern Slavery Policy in XLM's business, XLM plans to deliver online training to its employees and contractors on the subject.

## Monitoring and Reporting

XLM will continue to report on the measures it takes to identify and mitigate modern slavery risks as part of its annual sustainability reporting as well as its annual reporting as per the Act in the UK and other relevant markets.

## XLM's Future Commitments

We will:

- review and update our modern slavery statement each year in line with our commitment to ensuring that our business and supply chains remain free from any association with breaches of the Act and from the illegal exploitation of vulnerable people.
- continue to develop and update our policies and processes to ensure our approach remains appropriate within our risk profile.
- monitor any changes in our business and the environments in which we operate to mitigate and manage any new or emerging risks thereby maintaining our zero-tolerance approach to modern slavery.

This statement was approved by the Board of Directors of XLMedia plc on behalf of the Group on 30 January 2024.

**David King**  
Chief Executive Officer

**30 January 2024**