
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

RTB House SA and its global subsidiaries ('**RTB House**') recognise that all businesses have an obligation to prevent slavery and human trafficking and we are committed to do all we can to combat slavery and human trafficking within our business and its supply chains.

This statement is made pursuant to section 54(1) of the United Kingdom's ('**UK**') Modern Slavery Act 2015 and outlines the steps RTB House SA and its UK subsidiaries have taken to assess its operations and supply chain and mitigate any risk of slavery and human trafficking.

ORGANISATION'S STRUCTURE

RTB House SA with its registered office in Warsaw, is a global company that provides state-of-the-art retargeting technology for top brands worldwide. Our proprietary ad-buying engine is the first in the world to be powered entirely by deep learning algorithms.

RTB House SA conducts its business worldwide through its many subsidiaries (a full list of locations can be found on RTB House's website). Operating in Europe, Asia, Africa, Australia, Oceania and the Americas, the RTB House corporate group employs a global staff of over 1000 people.

RTB House SA runs its business operations in the UK through two subsidiaries:

RTB House Limited - a company registered in England and Wales with company Number 10523064 with its registered office at Kemp House, 160 City Road, London, UK EC1V 2NX; and,

RTB House LATAM Limited - a company registered in England and Wales with company Number 10928375 with its registered office at 293 Green Lanes, Palmers Green, London, UK N13 4XS.

RTB House SA and its UK subsidiaries operate consistently on preventing and eliminating modern slavery and human trafficking, as do the other subsidiaries within the RTB House corporate group.

OUR BUSINESS AND SUPPLY CHAINS

RTB House provides behavioural advertising services involving selection and delivery of personalised advertisements to Internet users on third party digital properties. RTB House does not act as a producer, manufacturer or retailer of physical goods and have no supply chains in relation to such activities.

Our supply chains include, but are not limited to, media agencies, supply-side platforms and data centers. We expect our suppliers and potential suppliers to maintain high ethical standards and operate in a professional and legally compliant manner. We consider corporate responsibility standards as a factor when choosing whom we work with, and, we also expect our suppliers to promote the same standards in their own supply chains.

We also work with regulated law firms and accountancy firms in the jurisdictions applicable to ensure we comply with local rules, regulations and laws and mitigate risks, ensuring that exploitation in any form does not take place in any part of the RTB House corporate organisation or supply chain.

OUR POLICIES INCLUDING ON SLAVERY AND HUMAN TRAFFICKING

RTB House has a zero-tolerance approach to modern slavery and is committed to ensuring that there is no modern slavery or human trafficking in any part of its business or supply chains. Our Anti-Slavery and Human Trafficking Policy reflects our commitment 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.

We do not work with third parties that do not meet our due diligence requirements. Where we consider it necessary, we include contractual obligations requiring our contractors to support our objectives under the Modern Slavery Act 2015.

Our HR processes ensure that those recruited have appropriate approvals to work, with candidates taking part in a multi-stage recruitment process.

All applicable laws and industry standards in respect of employee wages, minimum age requirements, benefits and working hours should be adhered to in all the countries where we operate. No young persons below the age of 16 shall be employed by RTB House.

Employees should be free to choose to work and leave the company on reasonable notice.

All employees and independent contractors must be provided with a clear contract of employment or equivalent cooperation contract, which complies with local legislation.

All employees and contractors co-operating with RTB House must be treated in a fair and equal manner, with respect. We provide equal opportunities in employment.

Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, gender (including gender reassignment), age, race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion and trade union activity should be prohibited.

Employees and contractors are encouraged to raise concerns, confidentially and without fear of retaliation, about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015. Suppliers must ensure their business operations are free of slavery and human trafficking both in the UK and elsewhere, internally and in their own supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we ensure:

- (a) Strict HR processes and verification of identity and the right to work at the outset;
- (b) Due diligence and contractual processes within our supply chain network to ensure compliance with legislative obligations;
- (c) Employee policies and contracts requiring compliance with legislative obligations; and,
- (d) Dedicated channels through which employees and contractors can confidentially voice concerns, from local reporting mechanisms to whistleblowing procedure, without fear of retaliation.

As at the date of this statement, RTB House has not identified any evidence of modern slavery or forced labour within our business or its supply chain. We are conscious that the high-tech nature of our business and the generally high level of education and legal awareness of our employees and contractors, acts to mitigate our exposure to the risk of slavery or human trafficking occurring within our business and supply chains. We remain committed to monitoring and reviewing this minimal risk.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, we require all employees and contractors to get acquainted with our Anti-Slavery and Human Trafficking Policy. All employees and contractors are expected to act with honesty and integrity and be aware of and comply with local guidelines and regulations in their country of operation.

We shall regularly review our policies and procedures to ensure any additional training, information and support is available to prevent modern slavery and human trafficking.

BOARD OF DIRECTORS' APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes RTB House's slavery and human trafficking statement for the financial year ending December 31st, 2021.

This statement has been approved by the Board of Directors of RTB House SA, RTB House Limited and RTB House LATAM Limited and all other members of the RTB House corporate group.

For and on behalf of the Board of Directors of RTB House SA and its UK subsidiaries the statement is signed on January 26st, 2022.

Robert Dyczkowski

President of Management Board

RTB House SA