



## JAGEX

### Modern Slavery Statement 2023

#### *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**”), and its overseas subsidiaries, Pipeworks, Inc. (“**Pipeworks**”) and Gamepires d.o.o (“**Gamepires**”), collectively hereafter referred to as “**Group**”, to guard against modern slavery and human trafficking within their business and supply chains. This statement is made in relation to the financial year ending December 31<sup>st</sup> 2023.

Whilst Pipeworks and Gamepires are not legally required to produce a statement (and Jagex is not required to produce a statement that extends to the Group), we have chosen to include our overseas subsidiaries nonetheless, as the Group’s focus is on ensuring transparency and a shared serious commitment to preventing modern slavery.

#### *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 over 450 people, Jagex is best-known for its massively multiplayer online role-playing game franchise *RuneScape*, which was launched over 20 years ago.

Pipeworks is a US video game studio employing less than 200 people, which provides full development, co-development, and live operations to some of the world’s leading video game publishers and other partners, as well as developing its own IP.



Gamepires is a comparatively smaller Croatian video game developer (headcount of approximately 60 people), best known for its survival game SCUM, as well as the Gas Guzzlers Extreme game series.

For the financial year being reported, the Group was ultimately owned by the US global investment firm, The Carlyle Group.

The Group engages a number of external partners to support their business operations and IP distribution. These partners range from video game service providers to catering services and from IT hardware suppliers to merchandise partners, with a host of other sectors represented elsewhere in the supply chain. As principally a 'work for hire' studio, Pipeworks is mainly providing services *to* other video game businesses (as opposed to sourcing services *from* external vendors) and its risk profile in a modern slavery context is accordingly slightly different. That said, Pipeworks ensures that it only provides work for hire support for those businesses with a shared commitment to ethical business behaviours.

Whilst the Group's supply chains do not *obviously* include any areas identified as being at high risk of modern slavery, all staff – but particularly those in vendor identification and selection positions of responsibility – are reminded of the importance of remaining vigilant and of abiding by the principles of the Jagex Supplier Code of Conduct, aimed at mitigating the potential for modern slavery or human trafficking to arise in our businesses and supply chains.

### ***Policies in relation to Slavery & Human Trafficking***

Jagex continues to maintain a suite of policies, which are routinely reviewed and updated, and which are designed to reduce the risk of modern slavery and human trafficking. The current policies are:

- Anti-Slavery Policy
- Anti-Bribery & Corruption Policy



- Supplier Code of Conduct
- Whistleblowing Policy
- Bullying & Harassment Policy

Pipeworks has an Employee Handbook which has a number of specific sections (mini-policies) which serve to mitigate the potential for modern slavery and human trafficking in its supply chains and business relationships, covering matters including:

- Employee Code of Conduct
- Unlawful harassment and discrimination
- Conflicts of interest
- Whistleblower Policy

Gamepires does not have any modern slavery specific policies, currently, but will be working with Jagex, as its parent company, to introduce and embed a suite of policies over the coming year.

### ***Risk Assessment and Management***

#### ***Suppliers***

The Group adopts a zero-tolerance approach to modern slavery and human trafficking. When Jagex engages suppliers on its own terms, those suppliers are required to sign up to the Jagex Supplier Code of Conduct (breach of which is a termination right in Jagex contracts).

The Supplier Code of Conduct 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.

We consider prospective partners' own policies and procedures on these issues as part of our due diligence procurement processes, as



we continue to expect a shared commitment to ethical business behaviours from those that we work with.

### *Recruitment*

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. The standard terms and conditions of employment for Jagex staff are drafted in accordance with applicable laws and this includes allowing employees to terminate their employment at any time on notice. The wider Group entities similarly have processes and contractual arrangements to ensure compliance with their local applicable laws.

### *Employee Wellbeing*

Jagex treats the health and wellbeing of its staff as a priority. Jagex remains a 'remote first' business, and as such, has maintained its focus on ensuring that its people feel supported and cared for, preserving the increased counselling / therapeutic coaching sessions and employee virtual 'pause and connect' events. Jagex continues to provide access to private medical care and mental health support to its staff. It also undertakes its cycle of ongoing anonymous staff satisfaction surveys, the results of which continue to drive actions aimed at improving employee wellbeing and company culture. During the review period year, Jagex conducted an Organisational Health survey, giving its employees a voice to foster a more supportive and well-rounded workplace.

Measures are taken to safeguard against abuse, coercion and other unacceptable behaviours in the workplace, through policies and procedures across the Group, including an Anti-Harassment & Bullying Policy, Anti-bribery & Corruption Policy and Employee Handbook requirements.



### ***Progress Over the Past Year***

Over the course of this reporting period, Jagex has identified a suite of compliance training materials, including modern slavery specific training, which are to be delivered as part of the 2024 training programme to its staff.

Jagex has also updated its enterprise risk register framework in which regulatory compliance (including modern slavery) features, and reflected the actions taken and training timetable as mitigation steps. It has introduced an updated cadence of review, as part of its overall risk management processes, that will see heightened attention and profile within the organisation to these topics.

### ***Looking Ahead***

Over the next year, Jagex will deliver the training programme that has been identified. Pipeworks will look to develop training and awareness programs for its employees and suppliers, as well as conduct audits of potentially high-risk suppliers to mitigate the risk of modern slavery in its supply chain. Gamepires will seek to introduce policies and processes as part of its overall business maturity in this regard.

The Group will seek to strengthen its overall due diligence processes for new and existing suppliers. Jagex and its subsidiaries shall continue to monitor developments more broadly within their supply chains and industry sector and aim to engage with industry peers and stakeholders to identify further best practice examples and opportunities.



**This statement was reviewed and approved by the Directors of Jagex Limited on 9 September 2024.**

Signed by:  
  
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Signed: Phil Mansell

Director & CEO