



**JAGEX**

## **Modern Slavery Statement 2024**

### ***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> 2024.

Neither Pipeworks or Gamepires are legally required to produce a statement (and Jagex is not required to produce a statement that extends to its Group). We continue, however, to include overseas subsidiaries in our annual statement, and involve colleagues from within these subsidiaries in the formulation and development of this statement, as the Group’s focus remains ensuring transparency and a shared serious commitment to preventing modern slavery.

Pipeworks was divested by Jagex on 30 May 2025. As a result, future Modern Slavery Statements (for the financial year ending 31 December 2025 onwards) will not include Pipeworks. As this current statement is reporting on a financial year during the entirety of which Pipeworks was part of the Group, the company is included.

This statement also takes account of the Home Office Statutory Guidance ‘*Transparency in supply chains: a practical guide*’, issued in March 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 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 just under 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 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 went through a change of ultimate ownership, with private equity ownership transferring from The Carlyle Group to CVC Capital Partners (CVC Funds) and Haveli Investments (<https://www.jagex.com/news/cvc-capital-partners-and-haveli-investments-agree-to-acquire-jagex>).

With the nature of the Group'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. That said, both player and supplier concentration is principally focused on the United States and Europe.

The Group does not produce physical products and instead supplies digital goods (video game content) to its users. The Group does, however, offer licensed merchandise through a longstanding, UK-based merchandise supplier (see <https://runescape.backstreetmerch.com>) and other licensed partners, who are subject to the same sourcing and onboarding processes as other suppliers.

The Group 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 IT Procurement, Commercial, Legal, HR, Finance and Cybersecurity 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. As the Jagex and Gamepires directors are the same, this provides for a consistency of oversight and direction in respect of overall governance.

With Pipeworks being mainly a 'work for hire' studio, it principally provides services *to* other video game businesses rather than sourcing services *from* external vendors – and as such does not have a supply chain in the same vein as the rest of the Group.

### ***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 are as follows:

- Anti-Slavery Policy
- Anti-Bribery & Corruption Policy
- Supplier Code of Conduct
- Employee Code of Conduct (*implementing changes in the reporting year*)
- Whistleblowing Policy
- Bullying & Harassment Policy



- Sanctions, AML & Counter Terrorist Financing Policy (*implementing changes in the reporting year*)

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

During the course of 2024, Pipeworks has updated the language in its Employee Handbook relating to anti-slavery and whistleblowing.

Gamepires has worked with external local Counsel in Croatia and Jagex as its parent company during 2024 to begin to prepare new policies pertaining to modern slavery and other compliance matters. These include an Anti-Slavery Policy, an Anti-Bribery and Corruption Policy and a Rulebook on Internal Reporting Procedures (a local requirement).

Policies across the Group 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, HR/People & Culture, Procurement, Communications as well as Senior Leadership and Executive Team members. The policies are then disseminated to the workforce, usually via a combination of communication channels such as Slack announcements 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 as a schedule and the 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 Bribery Act 2010 and Criminal Finances Act 2017 ones. We have utilised these commitments during the reporting year to resolve concerns that have arisen based on diligence and investigations undertaken by our team, and Jagex has exercised its right to terminate where our 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 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 that the partners insist on, in order to preserve our working relationship. These requirements also provide reassurance that the Group is partnering with reputable entities which share our commitment to ethical business practice.

### ***Assessing and Managing Risk***

The Group'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, the supply chains are not complex or large. The nature of the Group'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 the Group's operations and supply chains in 2024. Despite this, the Group preserves 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 has recruited a Director of Procurement in 2025, as part of its move to centralise procurement operations. As part of this process, and following this appointment, Jagex will be undertaking a refreshed supply chain mapping exercise during 2025, which will inform and influence the continued assessment and management of risk. This will comprise a desktop assessment on all suppliers, with modern slavery comprising part of such assessment.

A centralised Procurement Policy will also be developed, and underlying processes, procedures and practices (including purchasing practices) are to be reviewed as part of this. The intention is to ensure that 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 the 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.

Jagex's enterprise risk register framework encompasses regulatory compliance requirements and risks. These are monitored as part of routine risk review and mitigation processes, including at Executive level, to ensure progress is tracked and assessment is refreshed on a regular cadence.

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. The wider Group entities similarly have processes and contractual arrangements to ensure compliance with their local applicable laws and the Group has reporting mechanisms for workers to speak up and raise concerns or grievances.

### ***Training***

During 2024 (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 provided this training through the 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 (approx. 430 people). 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, which the participant had to successfully pass (by scoring at least 4/5) in order to complete the training. 90.4% of participants had successfully done so within a 21-day period.

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 14 February 2025) and the Walk Free website and resources, including its Global Slavery Index.

As mentioned previously, Microsoft requires its partners to complete training and certification requirements in order to preserve partner status. As such, during the reporting period, certain individuals (e.g. our General Counsel and our Submission and Release Manager, separately) 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 the modern slavery specific e-learning training to its entire workforce;
- Gamepires has produced an Anti-Slavery Policy, Anti-Bribery and Corruption Policy and a Rulebook on Internal Reporting Procedures;
- Pipeworks has raised awareness to its employees through updates to its Employee Handbook in relation to anti-slavery and whistleblowing; and
- Jagex IT procurement due diligence processes have been refined and strengthened, through the development of new onboarding forms (which will continue to be reviewed and updated with the centralisation of Procurement planned for 2025), for renewals and new supplier arrangements.

Looking ahead to 2025 goals, the Group will aim to:





1. Increase the awareness and understanding of modern slavery, and the Group Anti-Slavery Policies across the Group's workforce, assessed by:
  - a. the percentage of Jagex staff who have completed modern slavery training within 60 days of joining the organisation (with an objective of improving the 90% benchmark set by the 2024 training);
  - b. the number of communications and initiatives pertaining to this subject matter across the calendar year within the Group;
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. Undertaking a refreshed supply chain mapping exercise, initially focused on Tier 1 suppliers, with targeted expansion into high-risk categories such as:
  - i. External game development and art/asset suppliers
  - ii. IT hardware and offshore services

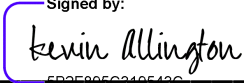
This will include gathering updated information on supplier location, ownership structure, use of subcontractors, and sourcing of materials or labour from high-risk geographies.

- b. Assess 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)
  - 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 26 June 2025.**

Signed by:  
  
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Signed: Kevin Allington

Director & Chief Operating Officer