



**RTB HOUSE S.A.**  
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**NIP** (Tax Identification No):  
5272694002

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING DECEMBER 31, 2024**

### **1. INTRODUCTION**

RTB House S.A. and its group affiliates (collectively referred to as the “*RTB House*”) recognize that all businesses share a responsibility to prevent modern slavery and human trafficking. We remain committed to identifying, assessing, and mitigating the risk of modern slavery or human trafficking occurring in any part of our operations or supply chains.

This statement is made pursuant to section 54(1) of the United Kingdom’s (“UK”) Modern Slavery Act 2015 as well as to sections 11, 14 and 16 of the Australian Modern Slavery Act 2018 (Cth).

It sets out the steps RTB House SA and its group affiliates have taken during the financial year ending **December 31, 2024**, to assess and mitigate any risk of slavery and human trafficking in our operations and supply chain.

Where applicable, this statement is intended to serve as a joint modern slavery statement on behalf of RTB House S.A. and its relevant group affiliates operating in the United Kingdom and Australia.

### **2. ORGANISATION’S STRUCTURE**

The RTB House SA corporate group operates across Europe, Asia, Africa, Australia, Oceania, and the Americas, supported by a global team of over 1,500 professionals.

RTB House SA delivers its services worldwide through a network of subsidiaries and affiliated entities within its capital group (a complete list of locations can be found on RTB House’s website).

In the **United Kingdom**, the RTB House corporate group conducts its operations primarily **through the following entities:**

- **RTB House Limited** – a company registered in England and Wales (Company Number 10523064), with its registered office at Kemp House, 160 City Road, London, UK EC1V 2NX;
- **RTB House LATAM Limited** – a company registered in England and Wales (Company Number 10928375), with its registered office at 293 Green Lanes, Palmers Green, London, UK N13 4XS;
- **AdLook Limited** - a company registered in England and Wales (Company Number 14035576), with its registered office at 85 Great Portland Street, First Floor, London, UK, W1W 7LT;
- **WhitePress Publishing LTD.** - a company registered in England and Wales (Company Number 12339845), with its registered office at 85 Great Portland Street, First Floor, London, UK, W1W 7LT.



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The RTB House corporate group conducts its operations in **Australia through the following entities constituting the relevant reporting entities for the purposes of Australian law and Australian reporting obligations:**

→ **RTB House PTE LTD** - a company registered in Singapore (Company Number 201622414H), with its registered office at 10 Ubi Crescent #04-19 Ubi Techpark 408564 Singapore;

→ **WhitePress Publishing LTD.** - a company registered in England and Wales (Company Number 12339845), with its registered office at 85 Great Portland Street, First Floor, London, UK, W1W 7LT.

RTB House S.A. alongside all other members of the RTB House corporate group, operate with a consistent focus on preventing and eliminating modern slavery and human trafficking.

### 3. OUR BUSINESS AND SUPPLY CHAINS

**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.

In addition to its core operations, RTB House corporate group also includes affiliated companies operating under the AdLook and WhitePress brands.

**AdLook** focuses on delivering cookieless advertising solutions powered by advanced artificial intelligence and deep learning technology. It offers privacy-first programmatic campaigns designed to address the evolving landscape of digital marketing.

**WhitePress** provides an automated content marketing platform that connects advertisers with digital publishers and influencers globally, enabling the distribution of sponsored articles and SEO-optimized content across multiple markets.

As the RTB House corporate group does not manufacture, produce, or sell physical goods, our supply chains are not associated with such activities.

Our suppliers primarily include professional services providers (e.g., accounting, financial, and insurance services), technology platforms (e.g., software solutions for time tracking or sales productivity), and coworking space providers. We also work with media agencies, supply-side platforms, and data centers. Given these are predominantly regulated or low-risk sectors, we assess the likelihood of modern slavery within this segment of our supply chain as minimal. However, we continue to maintain due diligence measures to ensure ongoing compliance with the UK and the Australian modern slavery legislation.

We expect our suppliers and potential suppliers to maintain high ethical standards and comply with all applicable laws. When selecting partners, we consider their corporate responsibility practices and expect them to promote these standards within their own supply chains. We also engage with reputable professional service providers (e.g. regulated law firms and accountancy firms) to help

RTB HOUSE S.A. with its registered office in Warsaw, 61/101 Złota Street, 00-819 Warsaw, entered into the register of entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register under number KRS 0000462115, NIP (Tax Identification Number): 5272694002, REGON (Polish Business ID): 146688693, share capital: PLN 5 077 720.20 fully paid up.



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ensure compliance with local legal frameworks and reduce the risk of unethical or exploitative practices.

#### 4. MODERN SLAVERY RISKS

While our suppliers primarily operate in professional and regulated sectors, we recognize that modern slavery risks may still arise in specific areas of our operations or supply chains. In line with the requirements of the **UK Modern Slavery Act 2015** and the **Australian Modern Slavery Act 2018 (Cth)**, we undertook a jurisdiction-specific risk assessment covering:

- the nature of the services provided;
- the structure of contractual relationships; and
- geographical and sector-specific vulnerabilities.

Based on this review, we have identified the following risk areas:

##### 1) Service-Based Risks:

Although most of our suppliers provide low-risk, professional services such as accounting, insurance, legal, or digital technology platforms, some categories of service may pose a higher risk due to their operational models or reliance on third-party labor:

- **Logistics, Courier, and Storage Services:** these sectors may involve subcontracted or casual labor models, potentially increasing the risk of exploitative practices, especially in lower tiers of the supply chain;
- **Recruitment and Payroll Services:** recruitment and labor hire arrangements, especially when involving temporary workers, are generally considered higher risk sectors due to less direct oversight of working conditions;
- **Facilities and Coworking Providers:** while coworking itself is low risk, ancillary services such as cleaning, maintenance, or security may be outsourced by providers, which could obscure labor practices at lower levels;
- **Event and Travel Services:** these categories often involve third-party logistics, hospitality, and temporary staff services - sectors that may carry elevated risks if labor practices are not closely monitored;
- **Corporate Card & Expense Processing:** offshore processing centres sit outside our immediate control.

##### 2) Entity-Specific and Indirect Risk:

We also considered potential risks associated with working with external service platforms and membership-based organizations, including:



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- **Technology and Productivity Platforms:** low inherent risk, but monitored and included in the broader review for completeness;
- **Digital Inventory and SSP Partners:** this category includes supply-side platforms (SSPs), ad exchanges, media networks, and mobile ad tech providers that offer RTB House access to programmatic advertising inventory across global markets. While these vendors are typically considered low-risk from a modern slavery perspective due to their digital and non-labour-intensive nature, they remain part of our extended due diligence scope;
- **Industry Associations:** minimal operational risk, but still assessed for ethical alignment and compliance.

In some cases, suppliers may rely on subcontractors or third-party service providers to fulfill parts of their contractual obligations. This limits RTB House's direct visibility into all tiers of the supply chain and represents an area we continue to monitor.

### 3) Geographic Risk:

Although both the United Kingdom and Australia are considered **low-risk jurisdictions** in terms of legal and enforcement frameworks, we acknowledge that modern slavery can still occur in highly regulated environments. Risks may arise from specific sectors, casual employment models, or service outsourcing, regardless of the overall market's regulatory maturity.

We remain committed to proactively addressing these risks through supplier onboarding processes, inclusion of modern slavery clauses in our contracts and distribution of due diligence questionnaires. These steps support our zero-tolerance approach to modern slavery and help ensure ethical integrity across our supply chains.

## 5. OUR POLICIES AND DUE DILIGENCE PROCESSES

RTB House has a zero-tolerance approach to modern slavery. We are committed to ensuring that no form of slavery or human trafficking takes place in any part of our business or supply chains.

To identify and mitigate potential risks of modern slavery, RTB House has implemented a number of measures and is continuing to strengthen its internal framework through additional initiatives:

→ **Anti-Slavery and Human Trafficking Policy:** currently under development and scheduled for implementation in 2025 for entities operating under the RTB House brand. This upcoming Policy will formalize RTB House's commitment to acting ethically and with integrity across all business relationships. It will establish clear systems and controls designed to prevent modern slavery and human trafficking;

→ **Supply Chain Due Diligence:** we do not engage with third parties unless they meet our due diligence requirements. We implement thorough contractual and onboarding processes to ensure suppliers and business partners comply with legislative obligations, including self-assessment questionnaires. Where

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appropriate, we include contractual obligations requiring contractors to uphold our objectives under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth);

→ **Human Resources (HR) Processes:** we verify the identity and right to work of every individual we cooperate with. Candidates participate in a multi-stage recruitment process to ensure compliance with all legal requirements. We require that all wages, benefits, and working hours comply with local employment laws and industry standards. We do not employ anyone under 16 years of age. All employees and contractors must have a clear, written contract. We have implemented robust regional anti-discrimination and anti-harassment (including anti-sexual harassment) policies, along with a diversity and inclusion policy, across entities operating under the RTB House brand. We also conduct regular training sessions for associates of entities operating under the RTB House brand to ensure these standards are clearly understood and upheld. We promote an inclusive workplace, prohibiting all forms of discrimination, victimization, or harassment;

→ **Internal Policies:** while our *Anti-Slavery and Human Trafficking Policy* is currently under development, entities operating under the RTB House brand have already implemented a comprehensive suite of internal policies that reinforce our ethical standards and commitment to fair employment practices. These include our:

- ***Compliance & Ethics Code;***
- ***local Employee Handbooks;***
- ***local Anti-Discrimination and Anti-Harassment Policies;***
- ***Diversity and Inclusion Policy;***
- ***Anti-Bribery and Anti-Corruption Policies;***
- ***Whistleblowing Policy;***
- ***Antitrust & Competition Compliance Policy.***

Each policy helps to uphold core principles, such as transparent business conduct and respect for workers' rights, and underpins our organization-wide approach to preventing forced labor and human trafficking;

→ **Reporting Concerns:** our employees and contractors can raise concerns confidentially and without fear of retaliation. We maintain local reporting mechanisms and a robust *Whistleblowing Policy* for entities operating under the RTB House brand, which outlines multiple channels for reporting any potential misconduct, including an anonymous reporting tool provided via the EQS Integrity Line. These procedures facilitate the early detection and investigation of suspected instances of modern slavery.

As of the date of this statement, **we have not identified any evidence of modern slavery or forced labor in our business or its supply chains.** Given the high-tech nature of our business and the high level of education and legal awareness among our employees and contractors, the risk of slavery or human trafficking in our direct operations is considered low. Nonetheless, we remain vigilant and



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committed to ongoing monitoring, due diligence, and review processes to identify and address any potential or emerging risks.

## 6. TRAINING AND AWARENESS

To ensure widespread understanding of the risks of modern slavery and human trafficking:

- all employees and contractors of entities operating in the UK and Australia under the RTB House brand will be required to review and acknowledge our ***Anti-Slavery and Human Trafficking Policy***, once implemented;
- we regularly evaluate whether additional training, guidance, or support is needed in light of changing legal requirements or business practices;
- we encourage an organizational culture grounded in honesty, integrity, and respect for local guidelines and regulations.

## 7. CONCLUSIONS

- **no** Modern Slavery incidents were identified in 2024;
- this is RTB House's consolidated joint statement for the UK and Australia under both regimes;
- in 2025 RTB House plans to develop and implement a dedicated ***Anti-Slavery and Human Trafficking Policy*** and related training. These measures will be introduced for RTB House brand entities based in both the United Kingdom and Australia.

## 8. BOARD OF DIRECTORS' APPROVAL

This joint statement has been prepared in accordance with the ***Australian Modern Slavery Act 2018 (Cth)*** and the ***UK Modern Slavery Act 2015***. It constitutes RTB House's slavery and human trafficking statement for the financial year ending **December 31, 2024**.

The statement was developed in consultation with the relevant group affiliates listed in Section 2. This process included direct engagement with local operational leads and compliance representatives, review of internal controls, exchange of internal policies, confirmation of training initiatives, and the alignment of due diligence practices across the relevant entities.

RTB House S.A. has ensured that all entities covered by this joint statement were consulted and involved in identifying and addressing modern slavery risks.



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This statement was approved by the Board of Directors of RTB House S.A., RTB House Limited, RTB House LATAM Limited, RTB House PTE LTD., AdLook Limited, WhitePress Publishing LTD, and all other members of the RTB House corporate group.

RTB House S.A. acted as the coordinating entity in preparing this joint Modern Slavery and Human Trafficking Statement, in accordance with Section 14 of the Australian Modern Slavery Act 2018 (Cth). The statement was approved by the Board of RTB House S.A. and signed by a duly authorised member of the Board.

**For and on behalf of the Board of Directors of RTB House S.A. and its group affiliates:**

**Robert Dyczkowski**  
President of Management Board  
RTB House S.A.