MODERN SLAVERY ACT STATEMENT

This statement has been published by Tremor International Ltd ("Tremor", the “Company” or “We”). It describes the actions taken by Tremor to prevent slavery and human trafficking in its operations and supply chains.

Tremor’s Statement and Commitment

We at Tremor are opposed to, and condemn, all forms of modern slavery and believe that human rights are universal. It continues to be a priority for Tremor to ensure that We trade ethically, source responsibly, and work to prevent modern slavery and human trafficking throughout our organization and in our supply chain. This statement highlights the key activities We have undertaken during this financial year to combat modern slavery in our organization and supply chain, such as ensuring that We, and our suppliers, partners, and contractors, adhere to certain standards including, but not limited to:

• No use of child labor;
• No use of forced, prison, or compulsory labor;
• Compliance with all applicable labor laws and regulations;
• Ensuring and promoting a safe, diverse, inclusive, secure, and healthy workplace;
• Not tolerating discrimination, harassment, or retaliation; and,
• Providing wages and benefits that approximately meet or exceed the national legal standards.

We believe that identifying, preventing, and addressing forced labor in global supply chains, and continuing to improve overall working conditions while reducing inequality are not just about living up to human rights requirements but also strengthen our culture and business, reduce risk, improve transparency, and create enhanced resiliency in our supply chain.

In short, We believe these actions and focuses are integral to the long-term success of our business, our reputation, and trust with our employees and customers and, further, believe they should be key focuses for businesses around the globe as well.

Organizational Structure & Business

Tremor is a global brand offering an end-to-end technology advertising platform for advertiser and media customers that caters programmatic advertising solutions across several formats and devices, with a primary focus on video, data, and Connected TV (“CTV”). The Company serves advertiser customers through its demand side platform (“DSP”) technology and creative solutions, and media customers through its supply side platform (“SSP”) technology, while also offering a data management platform (“DMP”) which We believe enables enhanced data and returns for both advertiser and media customers. Tremor International Ltd is the parent company in the Tremor Group. As of December 31, 2022, the
Company had 1,087 global employees with operations in approximately 14 countries and territories around the world, while serving advertisements in more than 140 countries. Of the 1,087 global employees, as of December 31, 2022, 682 were in the United States, 181 were in Tel Aviv and 224 employees were in other international locations. Tremor is headquartered in Tel Aviv, Israel and is listed on both the London Stock Exchange (AIM: TRMR) and NASDAQ (TRMR).

Our Policies on Slavery and Human Trafficking

At Tremor, We do not tolerate or condone any form of modern slavery or human trafficking in any part of our business. We have appropriate policies in place that underpin our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies and make our policies readily available on our Company’s website for all employees and interested parties.

Our policies reflect 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 operations and supply chains. We have the following policies in place relevant to modern slavery, which We routinely review and update:

- Code of Ethics and Conduct;
- Umbrella Anti-Harassment Policy;
- Whistleblower Policy; and
- Anti-Corruption Compliance Policy.

These policies are approved at the Board level and are implemented in all Tremor companies across the globe. The policies are reviewed regularly, or as changes in the business necessitate, and any proposed amendments are reviewed and approved by the legal department, management, and the Board. All employees are required to comply with our Code.

Due Diligence Processes for Slavery and Human Trafficking

The Company makes reasonable efforts to ensure all employees and agents within our supply chains are not subject to any form of forced labor or human trafficking by implementing and enforcing this statement. Adequate resources will be made available to ensure that slavery and human trafficking are not taking place within our organization or, to the best of our knowledge, within our supply chains.

Tremor has considered its business and supply chain and believes that its overall risk of exposure to modern slavery is low. While We currently believe that Tremor’s inherent risk of slavery and human trafficking potential is low, We will continue to assess and manage risk, and review our policies, on an ongoing basis.

As part of our initiative to identify and mitigate the risk of modern slavery We have systems in place to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
• Monitor potential risk areas in our supply chains; and
• Protect whistle blowers.

Supplier Adherence to our Values and Ethics

We have a zero-tolerance approach to modern slavery. To ensure all those in our supply chain, and contractors, comply with our values and ethics We have in place a robust customer and supplier compliance program. This process includes:

• All vendors are required to adhere to our Vendor Code of Conduct (or similar standards);
• All prospective publishers must pass a publisher vetting process, are subject to ongoing audits and are required to adhere to our publisher policy; and
• All advertisers are required to adhere to our advertiser policy.

We also have a dedicated compliance team, which consists of representatives from the following departments:

• Legal
• Audit and compliance
• Human resources
• Procurement
• Sales
• Finance

Our Effectiveness in Combating Slavery and Human Trafficking

Tremor’s management team, legal team, and Board is responsible for the ongoing review of this document and its policies to ensure effectiveness in its ongoing efforts to combat slavery and human trafficking. Reviews will be carried out annually, or as organizational changes necessitate. While We continue to believe the Company is at a low risk for modern slavery and human trafficking, We will continue to keep this under constant review. During 2022, no instances of modern slavery or human trafficking related to Tremor’s business, or its supply chain, were reported or identified to the best of the Company’s knowledge.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors of Tremor on May 11, 2023 and constitutes Tremor’s modern slavery statement for the financial year ending December 31, 2022. This statement has also been signed off by the Company’s Chief Executive Officer.