



# MessageMedia Group Modern Slavery Statement 2022



## Contents

Modern Slavery Statement 2022.....	3
Acknowledgement of Country.....	3
1 Reporting entities.....	3
2 About us.....	3
2.1 Our structure.....	4
2.2 Our operations.....	5
2.3 Our supply chain.....	5
3 Modern Slavery Risks.....	6
3.1 Risk assessment methodology.....	7
3.2 Risk profile.....	7
4 Actions to assess and address risks.....	9
4.1 Due diligence.....	9
4.2 Governance and accountability framework.....	9
4.2.1 Policies and procedures.....	9
4.2.2 Supply terms and conditions.....	11
4.2.3 Training.....	11
5 Assessing our effectiveness.....	11
6 2023 focus.....	12
7 Consultation.....	13

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# Modern Slavery Statement 2022

## Acknowledgement of Country

MessageMedia Group acknowledges the Traditional Owners and Custodians of the lands on which we live, work and serve. We celebrate the oldest living culture and its unbroken history of storytelling and communication. We pay our respect to Elders – past, present and future – and we strive together to embrace an optimistic outlook for our future in harmony, across all of Australia and for all of its people.

## 1. Reporting entities

This statement covers the activities of CLX Networks Pty Ltd (ACN 112 676 132) and its owned and controlled entities, including Message4U Pty Ltd (ACN 095 452 062) trading as MessageMedia (together the MessageMedia Group).

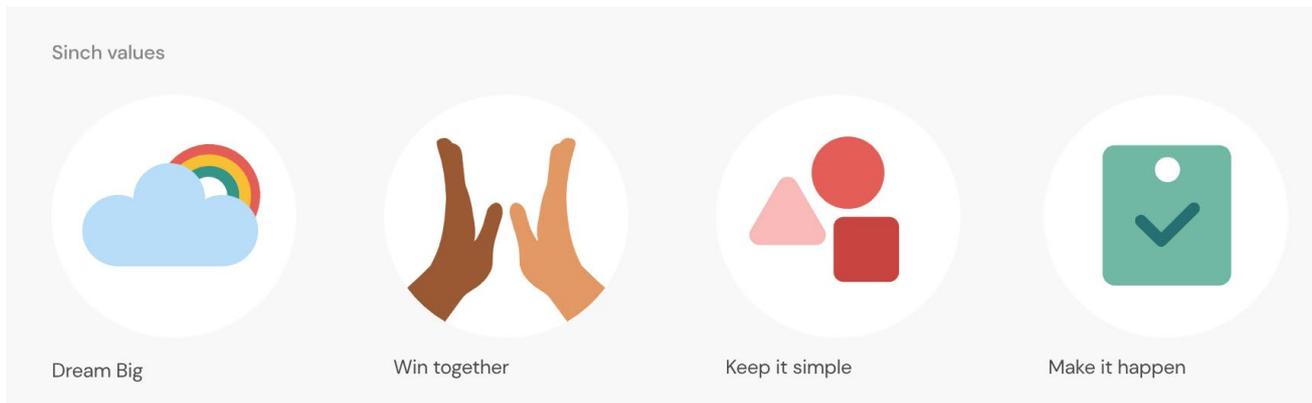
MessageMedia has taken the lead in preparing this Statement. It has consulted with its parent company Sinch AB (publ) (Sinch) in the preparation and release of the Statement.

This Statement reports the MessageMedia Group's actions from 1 July 2021 to 31 December 2022 (Reporting Period)

## 2. About us

The MessageMedia Group helps businesses engage with their customers through easy-to-use cloud-based messaging services. Our operations are predominantly focussed in Australia, New Zealand and the United States of America.

Our values are centred around “Dreaming big, Winning together, Keeping it simple and Making it happen”. These values are the foundation of our vision “Simplifying life by bringing all people and businesses together” and are integrated into our processes. In the MessageMedia Group, ethical standards and accountability are highly valued, which is reflected in how we interact with our communities and stakeholders.



## 2.1 Our structure

MessageMedia is a company incorporated in Australia with its registered office at Level 24, 367 Collins Street Melbourne, Victoria, 3000.

In November 2021, MessageMedia and its subsidiaries were purchased by Sinch AB (publ), headquartered in Sweden and listed on the Nasdaq Stockholm: XSTO:Sinch. Sinch and its subsidiaries offer leading customer communications products that support current and future communications channels.

MessageMedia itself has a number of owned and controlled Australian entities, including:

- ClickSend Pty Ltd (ACN 165 918 525);
- SMS Central Australia Pty Ltd (ACN141 611 645);
- SMS Broadcast Pty Ltd (ACN 127 334 785);
- DirectSMS Pty Ltd (ACN 114 992 880);

- Wholesale SMS (ACN 169 517 202);
- Bulletin.net Pty Ltd (ACN 119 955 805);
- Streetdata Pty Ltd (ACN 092 709 030);
- Text Messaging Technologies Pty Ltd;
- Mobipost Pty Ltd; and
- MessageNet Pty Ltd



During the Reporting Period, the MessageMedia Group employed 198 staff through the Message4U Pty Ltd entity. The MessageMedia Group has prepared this Statement as a single reporting entity in compliance with section 13 of the Modern Slavery Act 2018 (Cth) (Modern Slavery Act)

## 2.2 Our operations

The MessageMedia Group provides easy and engaging global messaging solutions for business and enterprise customers. Our core operations are in Melbourne (Australia), Auckland (New Zealand) and Denver (United States of America).

## 2.3 Our supply chain

Our procurement function has overall responsibility for the MessageMedia Group's supply chain management and for maintaining ongoing dialogue with our suppliers.

MessageMedia Group suppliers can be categorised broadly as follows:

- 1) Technology, Telecommunications & Product
- 2) IT, Customer Support and other Contractor Services
- 3) Corporate Services
- 4) Marketing & Sales
- 5) Software

Our supply chain is global and our largest suppliers are telecommunication carriers, infrastructure service providers and professional services providers. Our key suppliers are predominantly located in Australia or the United States of America.

## 3. Modern Slavery Risks

As a growing company with a diverse footprint, the MessageMedia Group recognises that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains. During the reporting period, the MessageMedia Group did not significantly change its operations and continues to assess the risk of modern slavery occurring in MessageMedia Group operations as low.

We continuously develop our processes for evaluating and selecting the suppliers with which we do business. Our Procurement Policy which applies to the Sinch Group was updated during the Reporting Period to align with our operating model and describes how we should manage supplier relationships depending on the type and value of procurement. When new suppliers are contracted, they are reviewed regarding aspects including IT and information security, privacy and financial stability. New suppliers that are expected to supply products or services must accept our Suppliers Code of Conduct or have an equivalent Code of Conduct that complies with our requirements.

### 3.1 Risk assessment methodology

We continue to follow the risk methodology utilised in previous years, which assesses MessageMedia Group's modern slavery risks, having regards to four categories being sector & industry risk, product & service risk, geographic location and specific entity risk.

Our risk assessment has again designated our risk profile as low. We have set out below further

information on the MessageMedia Group risk profile according to our defined categories of risk.



### 3.2 Risk profile

Risk	Description of risk
Sector /Industry	Our assessments continue to show that our sector risk to modern slavery is limited to a narrow set of industries, ranging from technology companies providing hardware, software and data centres as well as outsourced service providers such as professional services firms to businesses that provide equipment and services for our employees (such as office furniture, supplies, promotional materials cleaning and maintenance, food and beverage). This risk is mitigated by the other risk profiles noted in this table.
Product / Service	As a technology and communications service provider, we consider that the products and services we offer as well as those which we procure through our supply chain are generally considered to be low-risk, as few (if any) are at high-risk of forced labour/ exploitation having regard to factors such as the use of particular employment and recruitment practices, cyclical or seasonal nature of work and use of vulnerable workers.

	<p>In addition, we do not produce or procure products such as gold, bricks, sugarcane, coffee, tobacco or cotton, which have been identified as high-risk goods.<sup>1</sup></p>
Geographic	<p>Following a review of the geographic location of our supply chain, we have determined that our suppliers generally operate in countries that are considered by the Global Slavery Index to be less susceptible to modern slavery practices<sup>2</sup>.</p> <p>As noted in our previous Statement, we continue our growth in the Philippines, and whilst the Philippines is a country considered to be a medium risk on the Global Slavery Index, our engagement with contractors are governed by a standard agreement which includes all relevant protections. In addition, MessageMedia Group completes background checks on all contractors to verify their identity, age and legal ability to work.</p> <p>Once onboarded, contractors undertake our induction training, which includes awareness of our zero-tolerance approach to modern slavery.</p> <p>We therefore consider our geographical risk to be low.</p>
Specific Entity	<p>We have not identified any entities within the MessageMedia Group or MessageMedia Group supply chain that have breached, or are at risk of breaching modern slavery practices.</p>

<sup>1</sup> Using US Department of Labour List of Goods Produced by Forced or Child Labour.

<sup>2</sup> Global Slavery Index prevalence map: <https://www.walkfree.org/global-slavery-index/2018/findings/global-map/#prevalence>

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## 4. Actions to assess and address risks

Following our first reporting periods, we are continuing to raise awareness of modern slavery requirements within the MessageMedia Group and its supply chain. As noted above, Message4U Pty Ltd and its subsidiaries were acquired by Sinch in November 2021. During the Reporting Period, we have worked with Sinch and its subsidiaries to raise awareness of modern slavery laws in Australia, and discuss how some of the Australian practices can be embedded in the broader organisation.

### 4.1 Due diligence

We remain committed to continuously strengthening our understanding of potential modern slavery and other human rights risks relating to our operations and supply chains. In order to facilitate this understanding within our supply chain, MessageMedia Group continues to uplift its procurement process to ensure ethical practices throughout its supply chain. Due diligence remains a key part of our mitigation strategy and we continue to screen all strategic suppliers within the MessageMedia Group environment, with the vast majority engaging in supplier questionnaires to determine whether those suppliers engage in practices that could result in modern slavery risks. Those suppliers that do not agree to complete questionnaires are screened manually using publicly available information. MessageMedia Group does not engage with suppliers that are deemed an unacceptable risk of engaging in modern slavery practices.

### 4.2 Governance and accountability framework

#### 4.2.1 Policies and procedures

During the Reporting Period, we continued to iterate our policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks. These include the following:

- Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks and driving an accountability for ethical business practices across our organisation.
- Code of Conduct, applicable to the entire Sinch Group and available to employees on our intranet. Our Code of Conduct applies to all employees, consultants and to the Board of Directors. It is appended to all new employment contracts and all employees are required to sign it. Our Code of Conduct is based on the Ten Principles of the UN Global Compact and clarifies our stance on the importance of sound business relationships.
- Corresponding Code of Conduct for our suppliers set out the minimum expectations for our suppliers and third-party labour providers related to ethical practices including addressing modern slavery risks in their business. We have continued to iterate this process throughout the reporting period. We have also established an expectation with our suppliers that they will engage with their suppliers on similar terms. We wish to work in partnership with our suppliers to address

risks of modern slavery that exist in our suppliers.

- Whistleblower Policy that helps deter wrongdoing in our operations by encouraging disclosure of wrongdoing and ensuring that anyone who makes a disclosure can do so safely, securely and with confidence that they will be protected and supported.

- Anti-Bribery and Anti-Corruption Policy that outlines our commitment to



complying with laws and regulations addressing fraud, bribery and corruption in each country that we do business.

These policies and procedures complement our broader existing governance framework.

#### 4.2.2 Supply terms and conditions

Where possible, MessageMedia Group continues to implement its standard terms and conditions with suppliers. The standard terms and conditions include modern slavery safeguards, such as obligations to comply with the MessageMedia Group policies noted above, to not engage in any conduct that would amount to an offence involving modern slavery and to notify us if they become aware of (or suspect) modern slavery in their operations or supply chains. In scenarios where MessageMedia Group is unable to implement its standard supplier terms (which is the majority of situations), we endeavour to embed modern slavery obligations in the relevant clauses within the supplier contract.

#### 4.2.3 Training

We embed education and communications to build awareness amongst our staff in relation to modern slavery. During the Reporting Period, we conducted periodic targeted training for all new staff to explain our Code of Conduct and Whistleblower and modern slavery policies.

## 5. Assessing our effectiveness

We remain committed to reviewing the effectiveness of our actions, and we do this by:

- (a) consulting with senior management to ensure that they are aware of, and able to consider whether we are appropriately identifying and evaluating our modern slavery risks within the MessageMedia Group and its Supply Chain;
- (b) when commencing new operations or engaging new suppliers, assessing whether our existing risk management process remains appropriate and ensuring that modern slavery compliance is key to decision making with regards to new suppliers; and

- (c) evaluating our processes and procedures against industry practice, having regard to material published by the Attorney-General's department.

We continue to review our modern slavery compliance performance against indicators, including:

- (a) the number of suppliers who have committed to our Supplier Code of Conduct;
- (b) the number of suppliers with whom we have concerns relating to their responses to our Modern Slavery Due Diligence questionnaire; and
- (c) the number of suspected or identified modern slavery incidents within the MessageMedia Group operations or the MessageMedia supply chain.

## 6. 2023 focus

As this is our inaugural joint statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

Throughout CY23 we will focus on:

- (a) updating and consolidating our governance framework as part of integration with our parent company, Sinch;
- (b) continuing our education and awareness across our the MessageMedia Group; and
- (c) further developing and reinforcing supply chain management. We are currently evaluating which criteria we should measure and assess for new and current suppliers, for example regarding climate impact to take action and reduce our supply chain emissions. We have also identified a need to develop appropriate criteria related to human rights in response to regulatory changes that are occurring in certain countries in which we operate.

## 7. Consultation

During the Reporting Period, there was consultation and collaboration between members of the Sinch Group in the development of this Statement. As the technology, personnel and suppliers which underpins the MessageMedia Group operations are identical, there was no requirement to consult with subsidiaries.

Prior to being put to the Board for review and approval, this Statement was reviewed by the President, SMB, the Chief Financial Officer (SMB), and the Group General Counsel of Sinch AB.

This statement was approved by the Board of Sinch Communications Pty Ltd (formerly CLX Networks Pty Ltd (ACN 112 676 132)) on 21 January 2024.

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Damien Tabor

Director and President – Sinch SaaS BU