



## **Modern Slavery Statement**

### **Dataminr Inc**

**Reporting period: 1 January 2024 – 31 December 2024 (FY 24)**

**Reporting year: 4 (Fourth Reporting Period)**

**Legislation: *Modern Slavery Act 2018* (Cth) (Modern Slavery Act)**

## Opening Statement from Dataminr

Dataminr, Inc. and its subsidiaries (for the purposes of this statement “**Dataminr**”) are committed to ensuring that our business and supply chain reflects our values and respect for human rights. We are committed to improving our practices to combat modern slavery and human trafficking.

We are committed to ensuring that everyone we deal with is treated with dignity and respect, that the way we conduct our business deters any form of modern slavery which may occur in our own business or that of our suppliers and service providers, and that we are able to take appropriate action where required.

This is our Fourth Reporting Period under the Modern Slavery Act and this modern slavery statement covers all of the mandatory criteria under the Modern Slavery Act, including the key steps we have taken during the 2024 financial year (**Fourth Reporting Period**).

Notably we have implemented new vendor due diligence questionnaires as part of our procurement processes.

We are also pleased to report we have not identified a specific incident of modern slavery during this Fourth Reporting Period.

Our Anti-Modern Slavery Policy sets out our expectations and encourages staff to raise concerns about any issues or suspicion of modern slavery in our business or supply chains at the earliest opportunity. We have a number of other measures to identify modern slavery risks in our operations and supply chains, and to assess and address those risks.

We are aware that there have been a number of developments including the publication of the Australian Government’s response to the review of the Modern Slavery Act on 2 December 2024, accepting 25 of the recommendations in principle and noting a number of others. We will continue to monitor changes to the modern slavery regulatory landscape in our next reporting period and consider what implications this may have on our anti-modern slavery program.

We are aware that the inaugural Australian Anti-Slavery Commissioner Chris Evans was appointed on 7 November 2024 by the Governor-General for a five-year term and we welcome this development.

*For approval and signing see the MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE on page 8.*

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**1. Criterion 1: Identify the reporting entity**

This modern slavery statement (**Statement**) is made by Dataminr, Inc., 6 East 32nd Street, 6th Floor, New York NY 10016 (referred to as 'we', 'us', 'our', 'Dataminr' in this Statement).

Dataminr is making this Statement as a single reporting entity under the *Modern Slavery Act 2018* (Cth). This Statement covers the reporting period from 1 January 2024 – 31 December 2024.

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**2. Criterion 2: Describe the reporting entity's structure, operations and supply chains****2.1 Our structure**

- Dataminr, Inc. is the parent company of the Dataminr Group and is headquartered in New York, USA. Dataminr has affiliates located in the UK, Denmark, France, Germany, Ireland, and Australia. The Dataminr Group employs over 600 people worldwide and has offices in New York, Bozeman, Copenhagen, Denver, Dublin, London, Melbourne, Ottawa, Paris, and Arlington. A small number of employees are located in Canada.

**2.2 Our Operations**

- **Direct employment of workers:** The Dataminr Group employs over 600 people. We have 25 employees based in Australia.
- In 2024, we were named on the 'Built In's 100 Best Places to Work in Washington, DC.' This demonstrates our commitment to ensuring that Dataminr is a great place to work.
- **Services provided:** Dataminr provides event-based alerting and incident management solutions through its AI-driven software as a service ('SaaS') platforms, primarily to businesses, the public sector and newsrooms.
- Dataminr's operations include developing the SaaS platforms as well as the sale and marketing of our products and services.

**2.3 Our Supply Chains****Supply Chains for SaaS platform**

Dataminr operates a SaaS platform, meaning that our supply chains for our key products and services include hosting services for the Dataminr SaaS platforms from large, well-known hosting service providers. These hosting services are hosted in the United States and EU.

**General supply chains**

To support the development, sale and marketing of our SaaS platforms, operations and other activities, our supply chains also include the following general supply chains:

- IT equipment;

- professional services (e.g., Legal, Accounting, Insurance service providers etc);
- cleaning and facilities;
- office supplies; and
- marketing and promotion.

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**3. Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls**

As the key operational functions of Dataminr involve the employment or engagement of staff in our offices to deliver event-based alerting and incident management solutions, Dataminr has assessed the risk of modern slavery in its operations as relatively low.

In the Fourth Reporting Period, Dataminr considered the Walk Free Foundation Global Slavery Index 2023 (**Global Slavery Index**) and is pleased to report that:

- almost all Dataminr offices are located in the top 9 countries whose government response was listed by the Global Slavery Index as taking the most action against modern slavery;
- almost all Dataminr employees are located in the top 9 countries whose government response was listed by the Global Slavery Index as taking the most action against modern slavery;
- Dataminr has not identified that any of its suppliers or contractors operate in countries identified by the Global Slavery Index to have the highest prevalence of modern slavery.

Many of our key suppliers are well known and established businesses who have implemented modern slavery frameworks themselves (such as our hosting services providers).

In addition, we are not aware of any specific incident of modern slavery occurring in our operations and supply chains during the relevant reporting period. However, we have identified the following potential risks in our operations and supply chains using the Australian Government's Guidance for Reporting Entities (**Commonwealth Guidance**) and well established modern slavery indicators:

- **Electronics**, such as hardware including computers, printers and scanners, and software. However, we have limited leverage with these suppliers as Dataminr is one customer of many; and
- **Cleaning** (for example, in respect of our global offices, including Australia). We understand cleaning is a higher risk sector.

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**4. Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes**

Set out below in this section is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place that can be used to facilitate further risk assessment, prevention and mitigation.

Dataminr acknowledges that corporate responsibility is part of operating a modern business and is committed to lead with the benefits of all stakeholders in mind. Businesses now face even greater pressure to be more responsible and transparent. The more socially responsible the company, the more supportive and invested all of its stakeholders become. This approach towards social responsibility has informed our approach to all social issues, including modern slavery.

Notably, in our Fourth Reporting Period, we implemented **vendor due diligence questionnaires** related to modern slavery, as part of our procurement processes.

Existing and ongoing actions that we have continued through our Fourth Reporting Period include:

- continuing to **assess our modern slavery risk factors** including through our assessment of guidance including the Global Slavery Index against locations that we operate in;
- continuing to **raise awareness** through our global Anti-Modern Slavery and Human Trafficking Policy which is accessible to all of our employees as well as to consultants, third party representatives and business partners on an as-needed basis;
- **arranging training** for relevant personnel to help identify and manage risks of modern slavery;
- ensuring our senior management team are aware of Dataminr's obligations under the Modern Slavery Act in order to set an example to the rest of the business;
- Dataminr has in place a **whistleblowing policy**, which sets out the process for our employees to raise any concerns they may have in relation to compliance with our legal obligations, including in relation to modern slavery and human trafficking, and to ensure that there is adequate protection for employees who report concerns under the company's Whistleblowing Policy;
- **our employment policies and procedures** include comprehensive policies and procedures in place for recruitment and remuneration of staff, ensuring compliance with all applicable employment laws and regulations; and
- Dataminr **measures our employee engagement** by conducting internal surveys for employee feedback, to allow us to identify any potential concerns as soon as they arise, which has resulted in the investment to forge a more connected company culture with comprehensive diversity, equity, and inclusion initiatives. Dataminr has always made our employees a top priority—not just because it's good for our overall success, but because we believe it is the right thing to do.

**5. Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions**

In our last statement we set out a number of measures to assess the effectiveness of our actions. We have reported on these below as well as setting out indicative KPIs to assist use to measure our effectiveness in future reporting periods.

<b>Item</b>	<b>Steps taken to assess and the effectiveness of our actions</b>	<b>Outcome and indicative KPI for future reporting years</b>
<b>1.</b>	Monitor the number of issues or concerns raised with respect to the Anti-Modern Slavery Policy;	<p><i>Outcome</i></p> <p>No issues were raised during our Fourth Reporting Period.</p> <p><i>Indicative KPI for future reporting years</i></p> <p>To continue.</p>
<b>2.</b>	Monitor and address any issues which arise as a result of the vendor due diligence program	<p><i>Outcome</i></p> <p>No material issues were raised.</p> <p><i>Indicative KPI for future reporting years</i></p> <p>To continue.</p>
<b>3.</b>	Review and consider the additional resources published by the Australian Attorney Generals Department.	<p><i>Outcome</i></p> <p>We are aware that the inaugural Australian Anti-Slavery Commissioner Chris Evans was appointed on 7 November 2024 by the Governor-General for a five-year term.</p> <p>We are aware that the Australian Government published its response to the statutory review of the Modern Slavery Act on 2 December, 2024, accepting 25 of the recommendations in principle.</p> <p><i>Indicative KPI for future reporting years</i></p> <p>To consider the Government's response to the statutory review of the Modern Slavery Act.</p> <p>To monitor and consider the Anti-Slavery Commissioner's resources.</p>

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**6. Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls**

All entities in the Group are required to comply with our global policies and procedures, and relevant stakeholders of the Group entities were consulted in the development of this statement.

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**7. Criterion 7: Provide any other relevant information**

Dataminr is required to report under the UK Modern Slavery Act, and we continue to share learnings between different jurisdictions to help inform our approach.

**MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE****8. Principal Governing Body Approval**

This modern slavery statement was approved by the principal governing body, being the Board of Directors of

Dataminr, Inc.

as defined by the *Modern Slavery Act 2018* (Cth)<sup>1</sup> (“the Act”) on

June 26

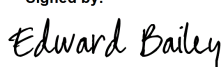
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**9. Signature of Responsible Member**

This modern slavery statement is signed by a *responsible member* of

Dataminr, Inc.

as defined by the Act<sup>2</sup>:

Signed by:  
  
 810EF37BF4F04EC...

Edward Bailey

CEO and Chairman of the Board of Directors

**10. Mandatory criteria**

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

<b>Mandatory criteria</b>	<b>Page number/s</b>
a) Identify the reporting entity.	3
b) Describe the reporting entity’s structure, operations and supply chains.	3
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5
e) Describe how the reporting entity assesses the effectiveness of these actions.	6
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	7
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	7