



## 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, and 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.

We are pleased to report we have not identified a specific incident of modern slavery during this relevant report period.

Our Anti-Modern Slavery Policy sets out our expectations and encourages staff to raise concerns about any issue 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 have set out these steps in this statement and look forward to continuing to report on how we are addressing this important issue in future statements.

*For approval and signing see the MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE on page 5.*

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## 1. Criterion 1: Identify the reporting entity

This modern slavery statement (**Statement**) is made by Dataminr, Inc., 135 Madison Avenue 9th 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 2021 – 31 December 2021.

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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 and has affiliates located in the US, UK, Denmark, France, Germany, Ireland, and Australia. The Dataminr group employs over 800 people worldwide.

### 2.2 Our Operations

- **Direct employment of workers:** The Dataminr group employs over 800 people. We have over 50 employees based in Australia.
- **Services provided:** Dataminr provides event-based alerting and incident management solutions to a variety of customers through its software as a service ("SaaS") platforms.
- 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

#### 2.3.1 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 services providers. These hosting services are hosted in the United States and EU.

#### 2.3.2 General Supply Chains

To support the development, sale and marketing of our SaaS platforms, operations and other activities, our supply chains also includes 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.

Dataminr employees work exclusively in territories that fall within the top three bands of 8 as rated by the Walk Free Foundation Global Slavery Index 2018 (Global Slavery Index 2018).

Dataminr has not identified that any of its suppliers or contractors operate in those countries that have the highest risk of modern slavery.

Many of our key supplier are well known and established businesses who have robust 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 such as 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.

- **Raising awareness** through our global Anti-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 applicable employment laws and regulations.

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

We have used this reporting period to develop an understanding of our modern slavery risks and to identify where such risks might be present in our operations and supply chains.

In order to assess the effectiveness of our actions in addressing modern slavery going forward, we intend to:

- Roll out additional modern slavery training to relevant staff members;
- Monitor the number of issues or concerns raised with respect to the Anti-Modern Slavery Policy; and
- Monitor and address any issues which arise as a result of vendor due diligence.

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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 have used this learning to help inform our approach. However, we recognise that there are key differences with the two regimes and as outlined in this Statement we are in the process of reviewing our approach to consider the Australian Government Guidance and 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* of

Dataminr, Inc.

as defined by the *Modern Slavery Act 2018 (Cth)* (“the Act”) on

27 June 2022

**9. Signature of Responsible Member**

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

Dataminr, Inc.

as defined by the Act:

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Edward Bailey

CEO and Chairman of the Board

Date of Signature: June 27, 2022

**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.	2
b) Describe the reporting entity’s structure, operations and supply chains.	2 – 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.	3
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.	3 – 4
e) Describe how the reporting entity assesses the effectiveness of these actions.	4
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).	4
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	4