

MessageMedia Modern Slavery Statement

Modern slavery statement

MessageMedia FY2020

This statement covers the activities of Message4U Pty Ltd (ACN 095 452 062) (trading as MessageMedia) (MessageMedia) and its owned and controlled entities during the period 1 July 2019 to 30 June 2020.

This is our first modern slavery statement under the Modern Slavery Act 2018 (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains. This Statement explains how MessageMedia, is committed to identifying the risks of modern slavery in our operations and supply chains and ensuring we take steps to address those risks.

This statement has been approved by the Board of MessageMedia on 11 March 2021.

About us

Our operations

MessageMedia provides innovative mobile messaging solutions that help businesses of all sizes, from SMBs to enterprise-level – better connect with customers. Our messaging solutions for alerts and notifications, billing and payments, appointment reminders, marketing, and staff scheduling are trusted by over 50,000 customers in industries such as healthcare, education, retail, and utilities. With offices across Australia, United States, United Kingdom, and New Zealand housing 270 team members, MessageMedia is the number one choice for easy and engaging business messaging.

Our supply chain

We work with suppliers from a number of countries including Australia, New Zealand, the United Kingdom, the United States. We also have a small number of employees and contractors in Vietnam and the Philippines. Our major suppliers are primarily located in Australia or the US.

The main types of goods and services that we procure are:

- (a) Telecommunications products such as SMS and MMS
- (b) ICT and digital products which support the core offering of our Services, such as web hosting and billing products
- (c) Office space and equipment
- (d) Professional services advice, such as accounting and legal
- (e) Marketing services, including digital marketing

The systems we use to procure suppliers is managed centrally and are generally uncomplicated. Most of our major suppliers are engaged on medium-long term basis on negotiated services or supply agreements.

Modern slavery risks

We recognise 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.

Risk assessment technology

We developed a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk.

Our initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks. Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
Sector /Industry	We believe 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 to businesses that provide equipment and services for our employees, including office furniture, office suppliers, promotional materials, food and beverage and maintenance and cleaning, amongst others. This risk is mitigated by the other risk profiles noted in this table.
Product / Service	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. 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 ¹
Geographic	We have reviewed the geographic location of our supply chain and 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 ² . We therefore consider our geographical risk to be low.
Specific Entity	We have not identified any specific entities in our supply chain which have breached, or are at risk of breaching modern slavery practices.

¹ Using US Department of Labour List of Goods Produced by Forced or Child Labour

² Global Slavery Index prevalence map: <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why during our first reporting period we introduced a number of steps to assess and address modern slavery in our operations and supply chains.

Due diligence

As noted above, we undertook an initial risk assessment to identify any key modern slavery risks that existed within our operations and supply chains.

We prioritised further risk assessment on those operations and direct suppliers that we identified as 'high-risk' or 'material suppliers' during our initial risk assessment. In these instances, we asked those suppliers and business partners to complete a detailed supplier questionnaire, which audited their ethical business practices and modern slavery risks. We also conducted further desk-top research to understand our supplier's business practices and key risk areas.

Policies and procedures

We have introduced a number of policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including the introduction of a:

- Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation.
- Supplier Code of Conduct that sets 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 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 in which MessageMedia does business.

These policies and procedures complement our existing governance framework.

Review of supply terms

We reviewed our supply terms with our direct suppliers and where possible, have introduced a number of safeguards for modern slavery risks. These safeguards include an obligation on the supplier to comply with MessageMedia's corporate policies related to modern slavery, 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.

We will continue to update existing supply terms throughout FY21 and ensure that where possible, modern slavery clauses are implemented with all new suppliers.

Training

We conducted targeted training for the legal and executive teams. We also make all new personnel aware of MessageMedia policies and procedures noted above.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by:

- (a) regularly reviewing our modern slavery processes, with senior management to consider whether MessageMedia is appropriately identifying and evaluating its modern slavery risks.
- (b) when commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate.
- (c) conducting an annual review of our data sources, to ensure we are appropriately identifying and evaluating our modern slavery risks.

We also monitor our performance against a number of key performance indicators. These include:

- (a) the number of our suppliers who have committed to our Supplier Code of Conduct;
- (b) the number of suppliers we have asked to complete a detailed Modern Slavery Due Diligence questionnaire; and
- (c) the number of suspected or identified modern slavery incidents.

Consultation

Prior to being put to the Board of MessageMedia for review and approval, this statement was reviewed by the Chief Executive Office, the Chief Financial Officer and the General Counsel/ Company Secretary.

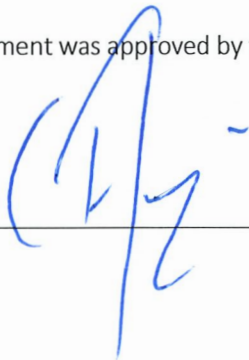
FY2021 focus

As this is our inaugural 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.

In FY2021 we will focus on increasing awareness of modern slavery risks both within MessageMedia and amongst our suppliers. We will deliver targeting training and review our current policy framework to ensure that it is up to date and appropriate, having regards to our business operations.

This statement was approved by the Board of MessageMedia on 11 March 2021.

Signed



Clark Perkins

Name printed Director and chairman, Message4U Pty Ltd