



Sinch MessageMedia

Modern Slavery Statement

2023



Statement from our EVP

On behalf of Sinch Communications Pty Ltd, I am proud to present Sinch's 2023 Australian Modern Slavery Statement. At Sinch, we've got big dreams and make great things happen – for our teams, our customers, and their customers. Driven by bold ambitions and simplicity, we're pioneering the way the world communicates, helping people and businesses build stronger connections and paving the way for what's next in cloud communications.

As part of our ongoing commitment to corporate social responsibility and ethical business practices, Sinch recognises the importance of addressing and combatting modern slavery in all its forms. This Statement sets out our progress since our 2022 Statement to identify, manage and mitigate the risks of modern slavery in our supply chains and operations.

Our values are "Dream big, Win together, Keep it simple and Make it happen". These values are the foundation for our vision of "pioneering the way the world communicates" and are integrated into our processes. At Sinch, ethical standards and accountability are highly valued, and are reflected in how we interact with our suppliers, communities, and stakeholders. We strive to make things happen and make them matter – for our customers and the world. We empower companies with the tools to address their economic, social and environmental challenges and opportunities through innovative information and communication solutions, while minimising potential negative impacts.

Modern slavery remains a significant global challenge, with millions of individuals around the world subjected to exploitation, forced labour and other forms of slavery. As a pioneering company, it is incumbent upon us to take steps to prevent and eradicate modern slavery within our operations and supply chains.

I encourage our customers, suppliers and Sinchers to familiarise themselves with our Modern Slavery Statement and to take whatever steps we can individually to increase business awareness of modern slavery and reduce the risk of it occurring in the supply chains of Australian goods and services.

DocuSigned by:

A handwritten signature in black ink that reads "Wendy Johnstone".

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Wendy Johnstone
EVP, APAC

Contents

1 Reporting entities.....	5
2 About us.....	5
2.1 Our structure.....	5
2.2 Our operations.....	6
2.2.1 Customer segments.....	7
2.2.2 Product offering.....	8
2.3 Our supply chain.....	8
3 Modern Slavery Risks.....	8
3.1 Overarching materiality analysis.....	9
3.2 Risk assessment methodology.....	9
3.3 Risk profile.....	10
4 Actions to assess and address risks.....	11
4.1 Due diligence.....	11
4.2 Governance and accountability framework.....	12
4.2.1 Global regulatory framework.....	12
4.2.2 Supply terms and conditions.....	14
4.2.3 Training.....	14
4.2.4 Memberships and certifications.....	15
4.2.5 Entity rationalisation.....	15
4.2.6 Targeted review of the Vietnamese workforce.....	15
4.2.7 Direct Employment Model for Philippines.....	16
4.2.8 Other initiatives.....	16
5 Assessing our effectiveness.....	17
5.1.1 Senior management consultation.....	17
5.1.2 Continuous improvement.....	17

5.1.3 Industry comparisons17

5.1.4 Performance indicators17

6 2024 Focus..... 18

8 Consultation..... 19

1 Reporting entities

This Modern Slavery Statement covers the activities of Sinch Communications Pty Ltd (ACN 112 676 132), and its owned and controlled entities, including Message4U Pty Ltd (ACN 095 452 062) trading as Sinch MessageMedia (collectively referred to as **Sinch MessageMedia**).

Sinch 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 and the Statement takes into account the actions collectively taken (or to be taken) by Sinch and Sinch MessageMedia to assess and address risks of modern slavery.

This Statement reports covers the period from 1 January 2023 to 31 December 2023 (**Reporting Period**).

2 About us

Sinch MessageMedia helps businesses engage with their customers through easy-to-use cloud-based messaging services. Sinch MessageMedia's operations are predominantly carried out Australia and New Zealand, but since the last reporting period, those operations have expanded more globally due internal reorganisation. Further detail on that reorganisation exercise is described later in the Statement.

2.1 Our structure

Sinch Communications Pty Ltd is a company incorporated in Australia with its registered offices at Level 24, 367 Collins Street Melbourne, Victoria, 3000. Sinch Communications wholly owns Sinch Australia Holdings Pty Ltd, which in turn owns Message4U Pty Ltd (trading as Sinch MessageMedia).

As stated in last year's Modern Slavery Statement, in November 2021, Message4U Pty Ltd and its subsidiaries were purchased by Sinch AB (publ), headquartered in Sweden and listed on the Nasdaq Stockholm: XSTO:Sinch. Since then, Message4U Pty Ltd (trading as Sinch MessageMedia) has been working with Sinch AB (publ) to harmonise, align and adopt business practices and procedures, with a view to becoming one Sinch. This is an ongoing project, and we aim to achieve continuous improvement each year.

As specified in last year's Statement, Sinch MessageMedia owns several other subsidiaries but has recently undertaken a brand consolidation and entity rationalisation project. This means that the Australian subsidiaries (other than ClickSend Pty Ltd (ACN 165 918 525)) are largely dormant and are in the process of being deregistered.

At the end of the 2023, Sinch had a workforce of 4,231. 32 percent of our employees were women. There were 12 members of Sinch's Global Leadership Team, including 3 women.

2.2 Our operations

Sinch's operations were structured in 2023 in four operating segments: Messaging, Voice, Email and SaaS.

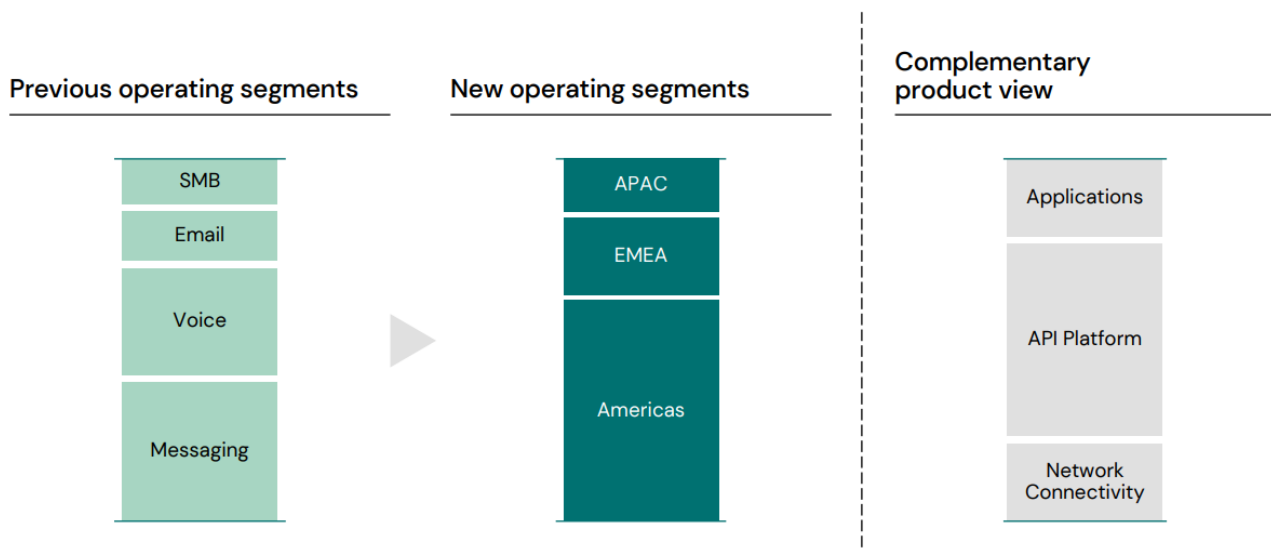
In the **Messaging**, operating segment, Sinch provided a cloud communications platform that businesses use to reach their customers directly on their phones via SMS and next-generation messaging technologies like WhatsApp and RCS.

The **Voice** operating segment offered Sinch APIs for voice communications, making it possible for business customers, service providers and telecom carriers to handle large volumes of voice calls, phone numbers and emergency calls with no need for costly investments in infrastructure.

Within the **Email** operating segment, Sinch offered industry-leading deliverability of transactional and marketing emails to more than 100,000 customers worldwide.

The **SaaS** operating segment offered a set of easy-to-use turnkey solutions that make it easy for small and medium-sized businesses to use messaging services. This is the operating segment in which Sinch MessageMedia previously sat within.

Sinch announced in October 2023 that it would implement a new operating model to accelerate growth. The new model is intended to increase customer focus, unlock cross- and upselling, and leverage Sinch's global scale in Product and R&D. Implementation of the new model implies integrating multiple acquired entities into joint organisations so that efficiency gains and cost synergies can be reinvested in initiatives that drive growth.



The new operating model groups Sinch's customer-facing functions in three strong geographical regions: **Americas, EMEA** and **APAC**. This creates a more effective sales organisation representing Sinch's entire product set to customers in key markets worldwide. In conjunction, product management and R&D were centralized to leverage Sinch's scale advantage and facilitate innovation. The new organization took effect on 1 January 2024, so details of how these new operating segments will affect Modern Slavery matters will be further set out in next year's Modern Slavery Statement.

01

Reporting changes from Q1

- Sinch announced changes to its operating model on 26 October 2023.
- New organization implemented from 1 January 2024.
- Updated external reporting matches changed internal governance and accelerated product integration.
- Proforma figures for 2023 are available at investors.sinch.com.

02

Three operating segments

- Integrated sales force now tasked to sell the full Sinch portfolio.
- Regional structure with three operating segments:
 - Americas
 - EMEA
 - APAC
- Replaces earlier segments Messaging, Voice, Email, SMB.
- Will disclose Net sales and Gross profit by segment.

03

New product categories

- Financial performance by product supplements regional segment reporting.
- Updated product categories reflect accelerated product integration and focus on cross- and upselling:
 - Applications
 - API Platform
 - Network Connectivity

Sinch's customer base can be segmented into categories, and we reach them through our own sales force and on-line sales based on self-serve.

2.2.1 Customer segments

2.2.1.1 Business to Consumer (B2C)

This customer segment is focused on customers who use Sinch's products and services directly to serve their end customers or employees. It is Sinch's largest single customer segment and spans a wide variety of industries, including financial services, IT and software, retail, healthcare, logistics, and many digital-native companies, where omnichannel digital communications drive their whole business model.

2.2.1.2 Business to Business (B2B)

This customer segment primarily integrates Sinch's solutions into a larger package or platform offering to take advantage of world-class connectivity across all communication channels and combine this with their own proprietary technology that is tailored to a specific use case, industry or geography.

2.2.1.3 Operators

Sinch has relationships with telecom operators worldwide and they also comprise a customer

segment. Sinch provides this group with a variety of products and services across all forms of communication.

2.2.1.4 Self-Serve

An important customer segment consists of customers who choose to sign up for the services online. The self-serve segment is made up of two distinct groups. The first group consists of individual developers and programmers who are often the final decision-makers for more technically oriented business customers. They want to be able to test the products independently, and they value a good user experience, self-service capabilities, and clear documentation, including sample code. The second consists of small business owners or product managers who have a simple job to do, often related to a single communications channel, and want an easy-to-use application with no need to talk to a sales or service representative. This customer segment was historically the base that Sinch MessageMedia serviced; however, as the newly introduced operating model continues to play out, different opportunities to provide cross-customer segment products may arise.

2.2.2 Product offering

Sinch's API Platform, Applications, and Network Connectivity services together form the Customer Communications Cloud. In 2023, the platform powered more than 800 billion unique customer interactions on behalf of more than 150,000 customers.



Customer Communications Cloud

Applications

- Software applications for customer engagement supporting use cases across marketing, operations and customer care.
- Targets business users.

API Platform

- APIs allow businesses to trigger mobile messaging, voice calling, and emails from their own internal or third-party IT systems.
- Targets developers and product managers.

Network Connectivity

- Primarily voice and messaging interconnect services, operator software and services.
- Target telecom operators and wholesale voice buyers.

2.3 Our supply chain

Sinch purchases products and services from many suppliers, and they vary in terms of size – some are small companies, others are multinational companies.

Sinch MessageMedia's suppliers can be broadly categorised broadly as follows:

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

Our supply chain is global, and our largest suppliers are telecommunication carriers, infrastructure service providers and professional services providers. Sinch MessageMedia's 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, Sinch 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. Responsible and secure business practices are at the core of everything we do at Sinch.

3.1 Overarching materiality analysis

Sinch's materiality analysis is the basis for our focus areas, which describe the environmental, social, and governance topics that are material to our business. We consider modern slavery risk of "moderate materiality," identified with reference to item 7 - "Human and labour rights."

Materiality analysis



3.2 Risk assessment methodology

At a more granular level, Sinch MessageMedia continues to follow the risk methodology utilised in previous years. This methodology assesses Sinch MessageMedia's modern slavery risks in four categories: sector and industry risk, product and service risk, geographic location risk, and specific entity risk.

Our risk assessment has again designated our risk profile as low. Below, we have provided further information on Sinch MessageMedia's risk profile according to our defined categories of risk.

3.3 Risk profile

Risk	Assessment
Sector / Industry	<p>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.</p>
Product / Service	<p>Our supply chain is global and our largest suppliers are operators and other suppliers of services such as Infrastructure as a Service (IaaS) and Software as a Service (SaaS). 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> <p>In addition, we do not produce or procure products for inputs such as gold, bricks, sugarcane, coffee, tobacco or cotton, which have been identified as high-risk goods.¹</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.²</p> <p>Sinch MessageMedia does have an outsourced workforce team that is based in Vietnam who undertake development work for us. According to the 2023 Global Slavery Index, an estimated 4.1 in every thousand people were in modern slavery in Vietnam at any point in 2021.³ This is 2.5 times higher than Australia's rating, and therefore higher risk. However, given various other factors, we still consider the risk low. Notwithstanding the low risk, we have undertaken some work to reduce the risk in relation to this workforce (detailed later in this Statement).</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 greater risk on the Global Slavery Index (compared to Australia)⁴, our engagement with contractors are governed by a standard agreement which includes all relevant protections. In addition, in 2024 Sinch MessageMedia will offer direct employment to its Philippines workforce through Sinch's Philippines corporation (Sinch Philippines Inc) which we believe will further reduce any modern slavery risks. Sinch MessageMedia completes background checks on all workers to verify their identity, age and legal ability to work.</p> <p>Overall, we consider our geographical risk to be low.</p>
Specific Entity	<p>We have not identified any entities within the Sinch MessageMedia supply chain that have breached or are at risk of breaching modern slavery practices.</p>

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

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

³ Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: <https://www.walkfree.org/global-slavery-index>

⁴ Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: <https://www.walkfree.org/global-slavery-index/>

4 Actions to assess and address risks

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. To facilitate this understanding within our supply chain, Sinch 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 Sinch MessageMedia 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. Sinch MessageMedia does not engage with suppliers that are deemed an unacceptable risk of engaging in modern slavery practices.

Sinch intends to further develop and reinforce supply chain management in the coming years. We are currently evaluating which criteria we should measure and assess for new and current suppliers on a group-wide basis, for example, regarding climate impact, to take action and reduce our supply chain emissions and further develop appropriate criteria related to human rights in response to regulatory changes that are occurring.

We continuously develop our processes for evaluating and selecting the suppliers with which we do business. Our Group Procurement function is responsible for Sinch's supply chain management and maintaining an ongoing dialogue with our suppliers. Procurements are coordinated by Sinch Procurement if one or more of the below conditions are met:

1. High-value procurement.
2. Where multiple countries/operations are or might be involved or can leverage from coordinated procurements and/or contract management at a group level.
3. Where the procurement or contracts are of strategic importance to Sinch.

A general principle is that only companies we see are selectable shall receive a Request for Quotation (RFQ). As a principle, an RFQ shall include Sinch agreements based on approved templates (where available).

The evaluation of received tenders is led by the appointed purchasing manager. Suppliers are evaluated based on technical, project, commercial, and legal requirements.

Validation activities are performed prior to signing a contract with a new supplier, such as background checks, financial assessment, sanctions list reviews, and environmental concerns in accordance with Sinch standards. These new suppliers must also accept our Supplier Code of Conduct or have an equivalent code of conduct that complies with our requirements.

For procurement exercises that do not go through the Group Procurement process, they remain subject to our Sinch MessageMedia procurement assessment, which includes completing our due diligence questionnaire and agreeing to the Sinch MessageMedia Supplier Code of Conduct. We are looking at how we best align and harmonise Sinch's procurement and due diligence processes with that of Sinch MessageMedia's existing processes.

4.2 Governance and accountability framework

4.2.1 Global regulatory framework

As we grow, we become more mature within the sustainability field and with the upcoming regulations in terms of the EU Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD) the global legislative demands are getting stricter. Sinch updated its materiality assessment during 2022, which sets the foundation for our focus areas based on the three pillars: environmental, social and governance. Within these pillars, sustainability topics are categorized and identified as our most material topics. The conducted materiality analysis is inspired by the principle of double materiality, identifying where Sinch has or expects to have the most material impact, risks and opportunities.

Social responsibility

Material topics:

- Diversity, equity and inclusion
- Health and wellbeing

Description of focus area

Our employees are the very core of our business and we strive to foster a diversified, inclusive working environment where employees feel secure to take on challenges and dare to dream big.

The work-life balance at Sinch is prioritized to ensure that our employees' health is maintained and by hosting various global and local initiatives we aim to enhance the wellbeing of our employees.

Events during the year

Development initiatives during 2023 had a focus on employee development. During the year recruitment processes were refined, focusing on making internal opportunities available to all employees, to foster career growth at Sinch. Furthermore, additional SinchBoost programs were launched, focusing on how to lead change.

Several global diversity initiatives were started to engage employees in maintaining a fair and inclusive workplace. Themes during the year were for example Women's International Day, Pride Month and Ethnicity.

Long-term goal

Sinch will set diversity targets and associated action plans to ensure that we are working effectively with diversity, equity and inclusion throughout the organization. Our long-term ambition is to become an even stronger and more aware employer every year.

The UN Sustainable Development Goals (SDGs)

Sinch's employees are the company's most important asset. Diversity, equity and inclusion are success factors for Sinch and the company is committed to ensuring that all employees have equal opportunities to develop to their full potential with us. Employee health and wellbeing are essential to our success.



Business responsibility

Material topics:

- Privacy and information security
- Business ethics and anti-corruption
- Supply chain management
- Product impact and innovation

Description of focus area

Our business relies on innovative products that ensure secure information management and privacy for all our customers and consumers. We operate worldwide and are committed to being a trustworthy partner, promoting ethical business, regulatory compliance and fair competition. This includes how we operate within our supply chain, and making sure that our suppliers deliver on the same standard across the globe.

Events during the year

We have continued to develop our programs for privacy compliance and information security, as well as continuously trained our employees in risk management.

Improvements have been made to ensure alignment with the Code of Conduct throughout our operations and the value chain. We also initiated a pilot to assess the climate impact of one of our products (SMS/MMS) by performing a life-cycle assessment (LCA).

Long-term goal

Sinch will develop its risk-related processes to ensure responsible business practices across the value chain. We also intend to identify opportunities to take further steps towards promoting sustainable development through our products and services.

The UN Sustainable Development Goals (SDGs)

As a global market actor, it is imperative that we act responsibly and ethically across the value chain. Our innovative solutions contribute to increasing access to information and communication technology, which enables businesses to manage economic, social and environmental challenges.



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

Code of Conduct

This Code applies to all of Sinch and is available to employees on our intranet. It also applies to all employees, consultants, and the Board of Directors. Our code is appended to all new employment contracts, and all employees are required to sign it. It is based on the Ten Principles of the UN Global Compact and clarifies our stance on the importance of sound business relationships.

Supplier Code of Conduct

This 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 the risks of modern slavery that exist in our suppliers.

SpeakUp

We introduced “SpeakUp” in 2022 for reporting of whistleblower concerns and have during 2023 made it our global reporting tool for all employees. We have worked actively to raise awareness about whistleblowing, how the process works and how employees can use SpeakUp, something that has resulted in an increase of reported issues. SpeakUp enables anonymous reporting and handling of incoming issues, communication with whistleblowers and classification and filing of issues. Sinch has zero tolerance for retaliation against individuals who report in good faith and works to ensure that everyone feels comfortable speaking up and reporting non-compliance with our Code of Conduct and other internal governing documents. Confidentiality is ensured in the process through established procedures for protecting the identity of the reporter and other involved individuals. Whistleblower concerns are reported to the Audit Committee on a quarterly basis. 26 issues were reported in 2023, of which 8 were substantiated concerns that were actioned. This 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.

SpeakUp process



Reporting

A concern is reported and the reporter receives a confirmation



Assessment

The concern is assessed for further investigation



Investigation

The concern is investigated and recommended actions are compiled



Remediation

Recommended actions are reviewed, decided and implemented



Monitoring

Decided actions are followed up



Closing

The report is closed and the reporter receives a confirmation of closure

4.2.2 Supply terms and conditions

Where possible, Sinch MessageMedia 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 Sinch MessageMedia policies, 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 Sinch MessageMedia is unable to implement its standard supplier terms, we endeavour to embed modern slavery obligations in the relevant clauses within the supplier contract. Recently, we successfully negotiated our standard modern slavery obligations within our contract renewal with one of our largest suppliers of developer services.

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 training for all new staff to explain our Code of Conduct and Whistleblower and modern slavery policies. In 2024, we plan to roll out targeted awareness training for Australian Sales teams and our Vietnamese workforce.

4.2.4 Memberships and certifications

As a member of the UN Global Compact, Sinch supports the Ten Principles for Responsible Business regarding human rights, labour, environment, and anti-corruption. We also publish an annual Communication on Progress (CoP) that describes our work to implement the Ten Principles and how we are contributing to the UN Sustainable Development Goals (SDGs).

Sinch's sustainability work is annually evaluated via EcoVadis, which assesses the quality of corporate policies, actions and outcomes in the areas of the environment, labour and human rights, ethics and sustainable procurement. In 2023, we received a "commitment" badge.

4.2.5 Entity rationalisation

We have undertaken a brand consolidation project leading to entity rationalisation. The rationalisation process is ongoing and being rolled out a company-wide level, which will continue to enhance visibility of our supply chain.

4.2.6 Targeted review of the Vietnamese workforce

Sinch MessageMedia engages a Vietnamese-based outsourced workforce model. As noted above, according to the 2023 Global Slavery Index, an estimated 4.1 in every thousand people were in modern slavery in Vietnam at any point in 2021. This is 2.5 times higher than Australia's rating and, therefore, higher risk.

We have reviewed our Vietnam workforce supplier in further detail and believe that the risk of modern slavery in our Vietnam workforce remains very low on the basis of the following factors:

Increased risk factor	Mitigating factor
Prevalence of modern slavery is 4.1 per 1,000 people.	The workers are not within the identified at-risk product category (garments). The workers are generally of high skillset technology workers.
We have a high level of spend with this supplier with a larger number of workers.	Sinch MessageMedia has worked with the supplier for more than 6 years. It is generally expected that suppliers which hold long-term relationships with customers are lower risk.
The supplier company is not publicly listed. The supplier company is incorporated in Hong Kong under the laws of Hong Kong.	The supplier is an ostensibly large and reputable company operating in 21 countries.
The employment relationship between the workers and supplier company is unclear.	We have put in place contractual protections to mitigate against this.

As a result of this targeted review, Sinch MessageMedia has determined to:

- roll out additional awareness training to its Vietnamese workforce, together with information in relation to how reports can be made to Sinch's SpeakUp reporting facility;
- require the labour supplier entity to complete our supplier questionnaire for further assessment and if needed, investigation.

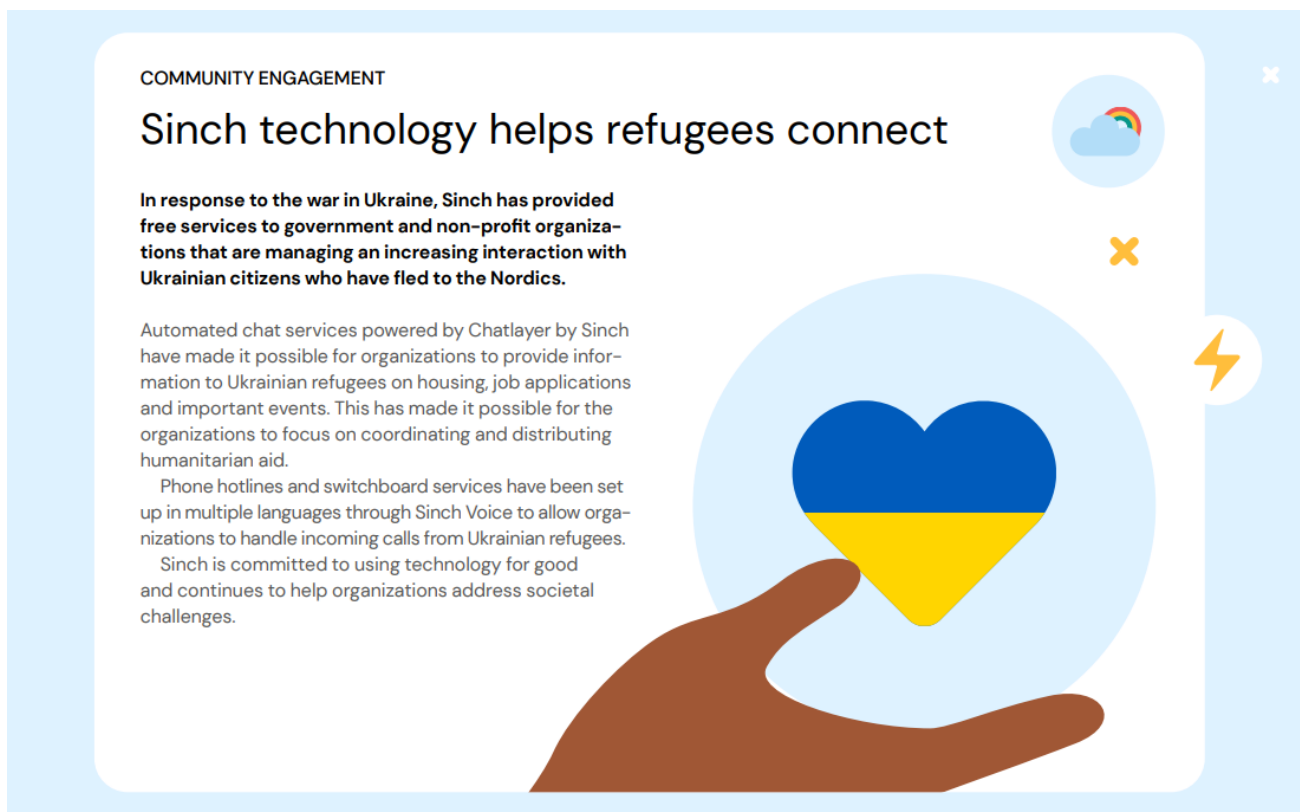
4.2.7 Direct Employment Model for Philippines

Sinch has determined that in 2024, it will commence offering direct employment to its Philippines workforce via Sinch Philippines Inc. We believe this step will reduce the potential risk of labour rights violations as Sinch will have more control over the workers' pay, hours, working conditions and other employment-related factors.

4.2.8 Other initiatives

Sinch took special measures in 2022 to ensure regulatory compliance linked to the sanctions imposed on Russia and Belarus. We decided not to engage in new business in Russia and to ban software deliveries to Russia. Further measures were agreed upon during the first quarter of 2023, when Sinch chose to suspend all customer relationships in Russia and Belarus.

Russia is placed in the top 10 countries with the highest prevalence of modern slavery.⁵ For the time being, Sinch has chosen to continue delivering services that are used for communication to and between individuals. We believe that our business can have an impact on the individual's ability to communicate and we take the consequences of shutting down our services very seriously.



COMMUNITY ENGAGEMENT

Sinch technology helps refugees connect

In response to the war in Ukraine, Sinch has provided free services to government and non-profit organizations that are managing an increasing interaction with Ukrainian citizens who have fled to the Nordics.

Automated chat services powered by Chatlayer by Sinch have made it possible for organizations to provide information to Ukrainian refugees on housing, job applications and important events. This has made it possible for the organizations to focus on coordinating and distributing humanitarian aid.

Phone hotlines and switchboard services have been set up in multiple languages through Sinch Voice to allow organizations to handle incoming calls from Ukrainian refugees.

Sinch is committed to using technology for good and continues to help organizations address societal challenges.

⁵ Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available from: <https://www.walkfree.org/global-slavery-index/>

5 Assessing our effectiveness

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

5.1.1 Senior management consultation

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 Sinch and its supply chain.

5.1.2 Continuous improvement

When commencing new operations or engaging new suppliers, we continually review whether our existing risk management process remains appropriate to ensure that modern slavery compliance is enhanced.

5.1.3 Industry comparisons

We evaluate our processes and procedures against industry practice, having regard to material published by the Attorney-General's department or the Walk Free Group.

5.1.4 Performance indicators

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

- training completion rates;
- whether documentation is in place and accessible;
- number of report made through our SpeakUp mechanism;
- the number of suppliers who have committed to our Supplier Code of Conduct;
- the number of suppliers with whom we have concerns relating to their responses to our Modern Slavery Due Diligence questionnaire; and
- the number of suspected or identified modern slavery incidents within our operations or supply chain.

6 2024 Focus

The risk of human rights violations and modern slavery within our operations and supply chain remains evaluated as low, and we are determined to minimise any potential risks that may arise. We are continuously improving our processes to strengthen the conditions for working systematically to support human rights. Throughout 2024 we will focus on:

Focus area	Detail
Training and awareness	Continuing our education and awareness across Sinch (targeted and broad training where appropriate).
OneSinch alignment	Following Sinch's recent rollout of its new operating model, we plan to expand our efforts to work with our global teams across Sinch to improve, align and leverage our processes, policies and approaches to human rights risks. For example, ensuring procurement processes are aligned and that Whistleblower Policies and Anti-Bribery and Anti-Corruption Policies align across the regions, where possible.
Promote sustainable practices	Identify opportunities to take further steps towards promoting sustainable development through our products and services.
Identify barriers	Identify any barriers to vulnerable workers accessing grievance mechanisms, such as SpeakUp. Workers who are at highest risk of modern slavery who are multiple steps removed or geographically remote. Such workers may not speak English. Such barriers necessitate additional action and efforts to reach vulnerable workers.
Direct consultation	Explore face-to-face contact with workers in medium or higher risk settings to facilitate connections between them and those attempting to uncover and address workplace problems. Consider whether we should be undertaking a deeper dive on any medium or higher risk suppliers identified, such as on-site inspection or audit of premises, workers or documentation.
Procurement prioritisation	Exploring improvements to Sinch's RFP/tendering rating system with respect to human rights, including prioritisation of suppliers who demonstrate respect for human rights. and giving such respect increased weighting in tendering processes.
Leveraging tools	Exploring whether we have the right tools in place and whether the use of Sinch's existing tools can be leveraged or expanded. By leveraging existing tools, there can be faster uptake and more consistent application of tools to identify and assess risk across Sinch.
Diversity targets	Sinch will set diversity targets and associated action plans to ensure that we are working effectively with diversity, equity and inclusion throughout the organisation. Our long-term ambition is to become an even stronger and more aware employer every year.

8 Consultation

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

Prior to being put to the Board for approval, this Statement was reviewed by the Sinch Group Sustainability Manager, the Sinch Group Head of Procurement, the Executive Vice President, APAC, the Chief Financial Officer (APAC), and the Chief Legal Officer of Sinch AB.

This Statement was approved by the Board of Sinch Communications Pty Ltd (ACN 112 676 132) on 25 June 2024.

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Roshan Saldanha

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Director of Sinch Communications Pty Ltd

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Hugh Haley

Director of Sinch Communications Pty Ltd