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**Modern Slavery Statement** 

#### Introduction

This is the Modern Slavery Statement for Thryv Australia Pty Ltd ABN 30 007 423 912 ("**Thryv Australia**") for financial year 1 July 2020 to 30 June 2021, prepared pursuant to the Modern Slavery Act 2018 (Cth).

### Our structure and operations

Thryv Australia is a provider of advertising, marketing, data and software services to Australian businesses. Thryv Australia Pty Ltd was previously known as Sensis Pty Ltd. The company changed its name and rebranded in September 2021, after it was acquired by Thryv, Inc. in March 2021, a company based in America.

Thryv Australia trades under its Yellow / Yellow Pages, White Pages, Whereis and Thryv Data (previously Sensis Data Solutions) brands. It has two subsidiaries:

- Australian Local Search Pty Ltd (trading under the True Local brand); and
- Life Events Media Pty Ltd (trading under the Thryv Agency brand (previously Found Digital)).

These companies are together referred to as the Thryv Australia Group.

Thryv Australia is the primary operating entity which manages sales and servicing (including through its call centre) as well as corporate functions for the Thryv Australia Group. Thryv Australia employs approximately 400 employees nationally, with the majority based in Melbourne. We also have a smaller number of corporate staff and face to face sales people and account managers located in other Australian states and territories. In August 2021, the company adopted a Work from Anywhere model meaning we no longer have a corporate head office.

### Our supply chains

Thryv Australia has a global supply chain consisting of over 250 contracted suppliers to support our operations and business. The sourcing and purchasing of goods and services is managed by our finance and procurement teams based in Australia.

In FY21, our suppliers were predominantly located in Australia, USA and Singapore. Our suppliers provide goods and services across these key categories:

- Print and distribution Directory printing services and associated distribution services. Predominantly purchased from suppliers located in Australia, Singapore and Finland with labour and materials mainly sourced from Finland, Singapore and Malaysia.
- Fulfilment, sales and servicing This includes outsourced business processes and functions



such as sales, contact centre and fulfilment services. Predominantly purchased from suppliers located in Australia, USA and India and labour mainly sourced from the same countries.

- IT supplies and services This includes digital services, IT equipment, software, cloud based services, Software as a Service and IT managed services to support our operations and business. Predominantly purchased from suppliers located in Australia, USA and Germany and labour mainly sourced from the same countries.
- Professional services This includes labour hire, consultancy and advisory services and specialist contractors to assist the business with IT projects, software development and IT operations. Predominantly purchased from suppliers located in Australia, with labour mainly sourced from Australia, the Philippines and India.
- Corporate services This includes property leases, facility management, general office supplies, telecommunication, human resources, legal services, travel, catering, recruitment and other employee services. Predominantly purchased from suppliers located in Australia, with labour mainly sourced from Australia.
- Marketing and public relations This includes advertising, corporate events, signage and merchandise, social media services, public relations and communication services. Predominantly purchased from suppliers located in Australia, with labour mainly sourced from Australia.

# Potential risks in our operations and supply chains

As a marketing, advertising, data and software services firm located in Australia with a largely professional workforce, we consider the risk of modern slavery in our own operations to be low.

However, to ensure that we minimise the risk of modern slavery across our supply chain, we developed a risk assessment matrix which factors geographic location, industry, types of goods or services supplied, reputation and past conduct, and business models when assessing the level of risk in our broader supply chain.

We have assessed all of the products and services that we procure using our risk assessment matrix, and identified that those within the categories of IT supplies and services, outsourced sales, call centre and fulfilment services have a higher innate risk of modern slavery.

We have not identified any instances of modern slavery in our operations or supply chain.

# Our approach

The Thryv Australia Group does not tolerate modern slavery in any part of our business and we are committed to ensuring it does not take place in our supply chain. We have implemented a robust framework to mitigate the risk of modern slavery occurring, alongside our existing systems and controls.

We have formal policies in place that reflect our aim to act transparently, respectfully and with integrity in all our business relationships. These include our Code of Conduct, our Whistleblower Protection Policy and our independent and confidential reporting service, STOPline which is available to our employees and contractors.



Our Modern Slavery Working Group (comprised of our Legal, Procurement and Compliance teams) was responsible for the development and implementation of the Thryv Australia Group's modern slavery policies and procedures.

Our policies and procedures to combat modern slavery include:

- Modern Slavery Procurement Plan: Introduction of a due diligence process which includes a modern slavery risk assessment framework and requirement for suppliers assessed as higher risk to undertake a modern slavery questionnaire. We also communicate our expectations to suppliers through our Supplier Code of Conduct and include a requirement to comply in our standard contractual terms.
- Modern Slavery Remediation Plan: Introduction of a remediation process under which our Compliance team is responsible for managing any modern slavery risks identified in completed modern slavery questionnaires, reported by suppliers or is otherwise brought to our attention. This includes assessing reported instances of modern slavery, working with suppliers to ensure the adequacy and/or appropriateness of remediation plans and restoration plans (to assist victims of modern slavery practices) and monitoring corrective actions in accordance with our internal guidelines.
- Modern Slavery Policy: Introduction of a Modern Slavery Policy to reflect our commitment to tackling modern slavery and encourage our personnel (both employees and external workers) to raise any concerns they may have about modern slavery practices occurring within our organisation or our supply chain. Our personnel can report their concerns to their manager, the Compliance team or in accordance with our Whistleblower Protection Policy. We are committed to supporting our personnel who raise genuine concerns under our Modern Slavery Policy.

### Measuring effectiveness

Our Modern Slavery Working Group continues to review, develop and modify our approach to combating modern slavery to ensure we meet our aims and the highest ethical standards. Our policies and processes are designed to help us track their effectiveness, including to identify and remediate instances of modern slavery and to assist victims as well as assessing the effectiveness of these actions.

### **Consultation across the Thryv Australia Group**

All companies within the Thryv Australia Group operate under the same management structure reporting to the Thryv Australia Chief Executive Officer who has reviewed and approved this Modern Slavery Statement.

### Improvements in FY21

In addition to performing assessments on new suppliers under our Modern Slavery – Procurement Plan, we have performed a review of new and existing suppliers for Thryv Australia. No instances of modern



slavery practice were found with those suppliers. In one case we have requested that a supplier include language in their Code of Conduct relating to modern slavery practices.

## Our goals for FY22

We plan to improve our documentation by explicitly requiring adherence to our Modern Slavery Policy in the Supplier Code of Conduct. This will ensure that supplier compliance is directly linked to contractual agreements.

This statement has been approved by the Board of Thryv Australia Pty Ltd on 16 December 2021.

DocuSigned by: John Allan -91CC5270BD29482...

John Allan Chief Executive Officer, Thryv Australia Pty Ltd

16 December 2021.