



TWITTER ASIA PACIFIC PTE. LTD. AUSTRALIA BRANCH TWITTER AUSTRALIA HOLDINGS PTY LIMITED

JOINT MODERN SLAVERY STATEMENT

(Financial Year Ended December 31, 2021)

This Joint Modern Slavery Statement of Twitter Asia Pacific Pte. Ltd. Australia Branch and Twitter Australia Holdings Pty Limited (together, '**Twitter Australia**', "**us**", "**we**", "**our**") reflects Twitter Australia's approach to addressing Modern Slavery risk within our business operations and supply chain, to support those who work with us being treated with the respect that they deserve. As both entities share the same policies and systems, operate in the same sector and have shared suppliers, Twitter Australia can set out a single, consolidated Modern Slavery Statement.

Twitter Australia is committed to promoting ethical business practices and policies that protect from such abuse and exploitation globally. Twitter Australia's values of transparency, honesty, trust and integrity guide the way that we work with all our stakeholders. Twitter Australia is opposed to all forms of exploitation, including human trafficking, child labour, forced labour, debt bondage, forced marriage, slavery and servitude (together, '**Modern Slavery**').

In line with the United Nations Guiding Principles on Business and Human Rights, Twitter Australia recognises the responsibility of business to respect human rights and is committed to working to mitigate the risks of Modern Slavery throughout our business operations and supply chain in Australia.

This commitment is set out in our Code of Business Conduct and Ethics and in our Supplier Code of Conduct. We repeat this commitment in this Australian Modern Slavery Statement.

This is Twitter Australia's first Australian Modern Slavery Statement and it has been prepared in consultation with each reporting entity. This Modern Slavery Statement is published in relation to Financial Year 2021.

OUR BUSINESS STRUCTURE

Twitter, Inc. operates the services of a social networking and micro-blogging platform, www.twitter.com (hereafter, “**Twitter**”) that allows hundreds of millions of people around the world to share views and follow current events. Twitter is the best and fastest place to see what is happening and what people are talking about all around the world. Twitter is where, every day, instances of breaking news, entertainment, sports, politics, big events and everyday interests unfold. Twitter’s purpose is to serve the public conversation through offering a free and safe place to talk. Twitter also provides opportunities for businesses to grow and have global reach, and to stay connected with customers everywhere. Twitter’s approach to human rights is integral to its purpose and values.

Twitter Australia is comprised of the following separate legal entities which are distinct from Twitter, Inc:

- Twitter Asia Pacific Pte Ltd, Australia Branch, a branch office of Twitter Asia Pacific Pte. Ltd, a Singapore incorporated company under UEN 201226794E (“**TAP**”). TAP’s role in relation to the Twitter platform is limited to reselling advertising services available on the Twitter platform throughout the Asia Pacific region, including Australia; and
- Twitter Australia Holdings Pty Limited, an Australian proprietary company, limited by shares, with ABN 45 162 121 824, which provides marketing, business planning and support services to TAP in building, maintaining and expanding potential advertisers in Australia.

Regional cross-functional teams, including our Ethics & Compliance, Corporate Security, Legal, Finance and Real Estate & Workplace, support Twitter Australia. Twitter Australia works with inclusive and diverse suppliers across our business operations and is proud to publish this Modern Slavery Statement on the basis of its global policies and processes in relation to our business operations and supply chains.

TWITTER'S SUPPLY CHAIN AND THE RISKS OF MODERN SLAVERY IN ITS BUSINESS OPERATIONS AND SUPPLY CHAIN

Twitter Australia is committed to ensuring that Modern Slavery risks throughout its business operations and supply chain are identified and mitigated. Twitter Australia's business is office and home based and its business operations are supported by a network of suppliers providing goods and services. Twitter Australia considers that the risks of Modern Slavery are very low throughout our direct business operations, due to the nature of the services that it provided, the technical nature of its operations and its highly skilled employees.

We are, however, conscious of the potential risks of Modern Slavery throughout our supply chain in Australia. There are differences in the Modern Slavery risk profile across Twitter's global business locations and we work to understand that of our vendor workforce in Australia. Through our annual global risk assessment analysis, we identify and assess potential risks which could be present in our supply chain, including in that of our business in Australia. We also identify risk mitigants and work to implement them in our business practices and those of Twitter Australia's suppliers.

In this Modern Slavery Statement, we set out the actions taken to assess and address Modern Slavery risks in our business operations and supply chain in Australia.

OUR CODES & POLICIES

Twitter Australia has a number of codes and policies which address how we conduct our Australian business in a manner that is ethical and in compliance with applicable laws and regulations.

These include:

- Our [Code of Business Conduct & Ethics](#) (the **Code**). The Code sets out our core values and expectations of employee conduct; including acting fairly and honestly, never through illegal or unethical business practices. Each employee, officer and director of Twitter Australia must never take unfair advantage of anyone through manipulation or any other unfair dealing practices.
- As reflected in our [Inclusion and Diversity Reports](#) (Q4 2020 report linked here) and [Global Impact 2020 report](#), we work to advance a culture of inclusion and diversity -

something fundamental to our collective voice and our values. We are committed to fostering an inclusive and diverse workplace free of any coercive practices, where people can feel comfortable, be themselves, and do their best work. We are likewise committed to equal pay for equal work. As part of this commitment, every year Twitter Australia reviews employee's pay following the Q1 compensation planning cycle, to make sure we're living these values.

- Our [Supplier Code of Conduct](#) sets out the conduct required from suppliers and specifically addresses issues of forced labour, underage workers, human trafficking and the promotion of workers rights. We share this information and ask that suppliers acknowledge it as part of their onboarding process.
- We have a Whistleblowing Policy and Ethics Helpline. Questions and concerns can be raised about our business practices and supply chain by employees or business partners, without fear of reprisal.

Twitter Australia encourages speaking up and for employees to report concerns via the Ethics Helpline or any of our reporting avenues, via frequent training, policy reminders and internal communications. Twitter Australia prohibits retaliation against any person who, in good faith, reports a suspected violation, seeks guidance on an ethics or compliance concern or otherwise assists in an investigation or proceeding regarding a suspected violation. All reported violations are taken seriously. If a Modern Slavery concern is raised, our Compliance team will coordinate with appropriate stakeholders to investigate and address the issue.

- Twitter's [Adult Sexual Content Policy](#) prohibits the promotion of adult sexual content. This includes paid advertising for prostitution / escort services/ mail order bride services. Twitter Australia also rejects any dating advertisers whose websites indicate that money, goods or services are exchanged in return for a date and dating advertisers which we believe to be fake or misleading. The policy is designed to ensure advertisers promote age-appropriate content, are mindful about cultural sensitivities and are compliant with market restrictions for certain types of adult content. In support of this, Twitter, Inc.'s [Illegal Products and Services Policy](#) prohibits the advertising or promotion of products, services or activities considered illegal in a particular jurisdiction. Our tools and communication channels help our users and others [report](#) illegal or abusive content in advertisements on the Twitter platform.

Doing business the right way is everyone's responsibility at Twitter Australia. This includes prohibiting any form of Modern Slavery or coercive working conditions. We are committed to ensuring that all of our interactions at Twitter Australia, as well as with our customers, business partners and suppliers are conducted in an ethical and respectful manner and in compliance with our Code, policies, and applicable law. Twitter Australia periodically reviews its policies and makes changes as and when required. All employees are expected to comply with the spirit as well as the strict requirements of our Code and other policies in place.

SUPPLIERS & DUE DILIGENCE

Twitter Australia deals with suppliers based largely in Australia, although we may engage suppliers in other jurisdictions.

Twitter Australia lives by its principles of transparency, integrity and trust and we strive to attain the highest ethical standards across all of our supply chain. We expect suppliers that we work with to share these standards and we work with them to ensure that they do so.

Supplier relationships are managed through our internal Sourcing Department. As part of our initiative to identify and mitigate risk, we vet new suppliers against global sanctions and other watch lists prior to onboarding and work to mitigate any risks (including Modern Slavery risks) involved with their supply of goods or services to Twitter Australia.

Twitter Australia requires that all onboarded suppliers acknowledge compliance with its [Supplier Code of Conduct](#), which sets out the required standards on ethical behaviour, labour, inclusion and diversity, health and safety and the environment. Our [Supplier Code of Conduct](#) explicitly prohibits Modern Slavery. We require that all suppliers hold their own suppliers and subcontractors to the same high standards set out in our Supplier Code of Conduct.

Our supplier agreements contain contractual provisions that require suppliers to adhere to and respect all applicable laws and regulations. Any violation of the terms of our Supplier Code could lead to the termination of the business relationship. Our dedicated Sourcing, Legal and Ethics & Compliance teams work closely together in collaboration with our wider business to review and improve our supplier compliance oversight processes on an ongoing basis.

RISK ASSESSMENT & REPORTING ON EFFECTIVENESS

If a Modern Slavery question or concern were to arise, our dedicated Ethics & Compliance team would oversee an independent investigation and address the issue with appropriate stakeholders.

In 2021, we completed an internal cross functional check-in process and review. We recently enhanced our internal intelligence sharing exercise between our Ethics & Compliance and Legal teams. Further, our Human Rights team, sitting within Legal, considers the risk of human trafficking in Australia as part of impact assessments focused on the expansion of our operations in Australia.

TRAINING & AWARENESS

To ensure a high level of understanding of Twitter Australia's core values and legal obligations, we provide regular live and system based training to all our staff on our Code and other policies.

Ethics & Compliance, Legal and other internal stakeholder teams take a collaborative approach to training and awareness sharing on emerging best practices, guidance and external advisory offerings available to support our *#OneTeam* approach.

PLANS FOR CONTINUOUS IMPROVEMENT

Twitter Australia seeks to continue and improve its approach to addressing Modern Slavery risks within its business operations and supply chain.

Twitter Australia has recently updated its [Supplier Code of Conduct](#) and ensures that its key suppliers in Australia acknowledge Twitter's expectations in relation to Modern Slavery.

Our Sourcing and Ethics & Compliance teams plan to review the Twitter Australia supplier list annually to assess potential Modern Slavery risks areas of our business and supply chain, as well as the effectiveness of our efforts to address these risks.

Our Ethics & Compliance and Real Estate and Workplace teams plan to specifically review the Modern Slavery and Human Trafficking Policies of our Twitter Australia soft services facilities

management service providers to ensure they are aligned with our own core codes, policies and principles.

Twitter Australia will continue to enhance supplier assessments, taking a risk-based approach, and will continue to work as a partner to identify and remediate any actual or potential Modern Slavery risk areas in the supply arrangement. This could include training, supplier surveys, and corrective action plans.

This Statement is approved by the board of directors of both Twitter Asia Pacific Pte Ltd and Twitter Australia Holdings Pty Ltd and is signed for and on behalf of both boards of directors by Foo Sei Seng Winston, Director of Twitter Asia Pacific Pte Ltd and Twitter Australia Holdings Pty Limited.



Foo Sei Seng Winston

Director

Twitter Asia Pacific Pte Ltd and Twitter Australia Holding Pty Limited financial year end: 31 December 2021