

MessageMedia Modern Slavery Statement

FY21

Modern slavery statement

MessageMedia

FY2021

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 2020 to 30 June 2021.

This modern slavery statement is made 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.

Since our first modern slavery statement last year, we have focused on increasing awareness of modern slavery risks both within MessageMedia and amongst our suppliers. We have delivered targeted training and further reviewed our policy framework to ensure that it is up to date and appropriate, having regards to our business operations and supply chains.

This statement has been approved by the Board of MessageMedia on 26 October 2021.

About us

Our operations

MessageMedia provides innovative messaging solutions that help businesses to better connect with customers. Our messaging solutions for alerts and notifications, billing and payments, appointment reminders, marketing, and staff scheduling are trusted by over 60,000 customers in industries such as healthcare, education, retail, and utilities. In FY21, MessageMedia expanded its global reach, acquiring a majority stake in US business, SimpleTexting LLC. This acquisition, along with historical acquisitions has resulted in MessageMedia owning 12 subsidiary companies and their related messaging brands across Australia, United States, United Kingdom, and New Zealand. With more than 400 personnel working to bring seamless, effective messaging 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 contractors in Vietnam and the Philippines who provide professional services to us such as customer support, development and finance administration. 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 utilise 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.

Using this methodology, we undertook risk assessments of modern slavery risks in our operations and supply chains over the reporting period to consider the extent to which MessageMedia is causing, contributing to, or directly linked to modern slavery practice. These risk assessments have confirmed that our operations and supply chains continue to have a low potential for modern slavery risks.

Since our previous reporting period, we have increased the number of contractors engaged in the Philippines and continue to expand this team, with an expected increase to more than 100 personnel by the end of FY22. Our key area of vulnerability remains our exposure to a narrow set of higher risk industries such as technology companies and the use of outsourced service providers.

Our broader 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 (such as those in the Philippines described above) 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

¹ [Using US Department of Labour List of Goods Produced by Forced or Child Labour](#)

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 . As noted above, we are increasing the number of contractors we have in the Philippines. Whilst the Philippines is a country considered to be a medium risk on the Global Slavery Index, we engage each MessageMedia contractor directly using a standard agreement which includes all relevant protections for the contractors. In addition, contractors undertake MessageMedia induction training, which includes awareness of MessageMedia’s zero-tolerance approach to modern slavery. 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.

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. Over this reporting period, we have made significant progress in implementing further steps to assess and address modern slavery in our operations and supply chains. These additional steps include a more rigorous procurement process and due diligence as well as increased awareness and training for all MessageMedia personnel.

Due diligence

As noted above, we undertook risk assessments 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 a number of policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including:

- 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.

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

- 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 broader governance framework.

Implementing our updated supply terms

During the reporting period where possible, we have engaged new suppliers on our updated supply terms, which include 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.

Training

We conducted targeted training for the legal and executive teams. We also extended modern slavery training to all employees and have introduced modern slavery awareness into our onboarding processes.

Assessing our effectiveness

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

- regularly reviewing our modern slavery processes with senior management to consider whether MessageMedia is appropriately identifying and evaluating its modern slavery risks.
- when commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate.
- 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:

- the number of our 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.

Consultation

During the reporting period this statement covers, MessageMedia actively engaged and consulted with all owned and controlled entities in the development of this statement. As all but one of MessageMedia's subsidiaries is wholly owned and operated, consultation with those subsidiaries is ongoing throughout the reporting period and carried out in accordance with the group's broader governance framework.

SimpleTexting Inc is a subsidiary we do not wholly own. Therefore, our consultation has focused on providing training and awareness of MessageMedia’s modern slavery obligations and continually increasing our awareness and integration with SimpleTexting’s operations. We also have broad oversight of SimpleTexting via monthly board reports and discussion.

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 of MessageMedia.

FY2022 focus

MessageMedia is in the process of being acquired by global messaging company, Sinch AB (publ). In FY2022 we will focus on ensuring that all relevant Sinch entities and businesses are aware of their obligations under Australian modern slavery laws and have access to training and resources. We are also going to focus on embedding modern slavery obligations within our key supplier contracts, as many of these contracts are being renewed in FY22.

This statement was approved by the Board of MessageMedia in their capacity as principal governing body of MessageMedia on 26 October 2021. This statement is signed by Clark Perkins, in their role as Chairman of the Board of MessageMedia.



Signed

Clark Perkins, Chairman, Message4U Pty Ltd

Name printed

Dated: 26/10/21