

Modern Slavery Statement

A. Introduction

This Modern Slavery Statement (this “Statement”) is made by Constant Contact, Ltd. and Moosend, Ltd., both private limited companies registered in England and Wales, and Vision 6 Pty Limited, a private limited company registered in Queensland, Australia (collectively, the “Reporting Entities”), in compliance with applicable global modern slavery legislation, including the UK Modern Slavery Act 2015, and the Australian Modern Slavery Act 2018. This Statement sets out the steps the Group has taken in the fiscal year that ended on December 31, 2024 in an effort to ensure that its supply chain and operations are free from modern slavery and human trafficking. For purposes of this Statement, “Group” means Constant Contact, Inc. and its subsidiaries, including the Reporting Entities.

B. Business and Structure

The Group provides cloud-based digital marketing services, including customer support and professional services, to a broad range of customers that are predominantly small and medium sized businesses. The Group has a global customer base.

Constant Contact, Inc. is a Delaware corporation that was founded in 1995 and is headquartered in Waltham, MA. The Reporting Entities are wholly owned subsidiaries of Constant Contact, Inc.

C. Supply Chain

The Group’s supply chain includes cloud and SaaS services providers, hardware, office equipment and cleaning services, and professional services, including accounting, marketing and legal services. Most of its suppliers are based in the United States.

D. Risk of Modern Slavery and Human Trafficking

Modern slavery poses a risk within the operations of a company and in any supply chain, particularly in certain high-risk industries or geographical regions. However, the Group is confident that the risk of modern slavery and human trafficking in its operations and supply chain is relatively low. The Group’s workforce primarily consists of educated professionals residing in countries with lower risk of modern slavery and who are less vulnerable to modern slavery. The Group’s hiring process includes verification of the right to work in the relevant jurisdiction, mitigating the risk of modern slavery in its operations.

The majority of the Group’s suppliers are located in countries with lower prevalence of modern slavery. In general, the Group’s suppliers operate in industries with lower risk of modern slavery, including technology and business solutions, software, digital marketing and professional services.

E. Approach to Mitigating Modern Slavery Risks

The Group’s commitment to maintaining a work environment and a supply chain free from modern slavery is unwavering. In line with this commitment, the Group is implementing the following measures in an effort to proactively prevent modern slavery within its operations and across its supply chain:

- *Employees* - Continue to mitigate the risk of modern slavery in our workforce by verifying a prospective employee’s right to work in the relevant jurisdiction.
- *Suppliers* – When engaging with suppliers, perform due diligence, e.g., screening the supplier against global sanctions lists, and conducting adverse media searches.

- *Contractual Commitments* – Seek to include contractual commitments in the Group’s supplier agreements that specifically mandate compliance with modern slavery laws, ensuring that the suppliers are held to high ethical standards.
- *Training* – Offer specialized training to key Group personnel to recognize potential risks, adhere to relevant legislation, and work to prevent modern slavery across the Group’s operations and supply chain.

The Group’s commitment to ethical business practices and accountability is underpinned by a set of policies and procedures, which include, among others:

- Code of Business Conduct and Ethics;
- Procurement Policy; and
- Whistleblower Hotline.

The Group prohibits retaliation against anyone who reports a concern. In the event we become aware of any matters related to modern slavery, the Group’s Legal and Compliance team would investigate the report and determine any necessary actions.

F. Assessing Effectiveness of Actions and Further Steps


The Group recognizes that its review and assessment of its actions to identify and address its modern slavery risks in its operations and across its supply chain will be an ongoing and evolving process that the Group is committed to continue to build upon. To this end, the Group has set annual goals to reach so it can look back and assess the effectiveness of its approach and inform its path forward.

G. Approval and Signature

The Reporting Entities do not have any owned or controlled entities to consult as part of the development of this Statement.

This Statement was approved by the Board of Directors of Constant Contact, Inc. on September 30, 2025.

This Statement is signed by Michael Pellegrino, in his role/capacity as Director of Constant Contact, Inc.

Signed by:

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Michael Pellegrino
Director
Constant Contact, Inc.