

MODERN SLAVERY ACT 2015: ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction from Richard Hanscott, Chief Executive Officer

The Commify Group of Companies, which includes the Esendex, TextMarketer, TextAnywhere and 2sms brands in the UK, is committed to improving business practices to combat slavery and human trafficking across the business and its supply chain.

The Organisation's structure

We are a provider of global business communications services in the messaging sector. Our head office is 20 Wollaton Street Nottingham, NG1 5FW. We employ circa 300 people globally and trade through business units in nine countries; the UK, France, Italy, Germany, Spain, Romania, Australia, the Netherlands and the USA. With over 47,000 customers we are one of the largest providers in our market.

The Commify Group of Companies to which this statement applies includes Commify Limited, Commify UK Limited, Commify Topco Limited, Falcon Equityco 1 Limited, Falcon Equityco 2 Limited, Collstream Limited, Mobile Messaging Group Ltd, Bulk SMS Ltd and trading subsidiaries in each of the aforementioned countries.

Our policies and values on slavery and human trafficking

As part of our commitment to combating modern slavery, we have implemented the following policies:

1. Anti-Slavery Policy – which sets out the responsibilities of our management and employees, the risks within our business and our procedures for combating slavery together with information on how to identify and report slavery.
2. Hiring Policy – which demonstrates our commitment to acting ethically and with integrity in all our recruitment activities and following procedures to minimise any risk of slavery.

Commify takes pride in our high ethical standards and strong values which are embedded in the organisation and articulated within our Employee Code of Conduct and Statement of Values.

Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we employ dedicated resources and procedures which include conducting in depth supplier due diligence exercises that encompass a focus on modern slavery. Our Human Resources team also follow a number of procedures and checks to reduce risks of modern slavery in the course of recruitment.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistle blowers.

Risk and compliance

As a service-based business, in the technology space, our supply chain is neither people intensive, nor does it use raw materials as we primarily purchase services from global telecommunications providers. Our primary suppliers are the large Mobile Network Operators in each of the countries where we operate. These include some of Europe's largest companies such as Vodafone, Telecom Italia and EE.

In light of the above, we have assessed the risk of slavery and human trafficking in our organisation and in our ongoing supply chain to be low.

Where we have identified a potential risk we have mitigated this through our aforementioned due diligence and supplier on-boarding processes.

All employees are employed under a written contract that sets out their benefits and obligations; all UK members of staff are paid in excess of the UK national minimum wage and we expect the same to be true in our supply chain.

We do not tolerate slavery and human trafficking within our supply chains and if we found evidence of any related activity we would seek to terminate our relationship with the relevant supplier.

Effectiveness and key performance indicators

We will use key performance indicators to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. These are as follows:

1. Ensure annual training for employees engaged in supply chain and recruitment activity; and
2. Conduct external screening searches on all Tier 1 suppliers and other suppliers deemed higher risk.

Training

We educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programme, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. The most recent training session was completed in December 2022.

Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, to further tackle slavery and human trafficking we plan on auditing our existing supplier contracts to assess the relevant modern slavery obligations included.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2022.

This statement was approved by the Commify board on 25th May 2023.