

Modern Slavery and Human Trafficking Statement

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Messagepoint Inc.'s ("Messagepoint"), including Messagepoint Europe Ltd., slavery and human trafficking statement in respect of the financial year ending 31 October 2021.

Group Structure

Messagepoint is a privately-owned, PE-funded software company. We enable large enterprises to deliver enhanced customer experiences and achieve a better bottom line by optimizing their omni-channel customer communications.

Our award-winning platform gives non-technical business users such as marketers, CX teams and product owners intelligent control over the content in customer communications to achieve unparalleled personalization, relevancy, brand consistency, and compliance.

Our Business

Founded in 1998 as Prinova, Messagepoint has grown from its beginnings as a top global Customer Communications Management (CCM) integrator, to become a leader in the space due to our unique ability to intelligently manage content.

Our Supply Chain

The Company uses a rigorous procurement process operated by Messagepoint's head office team which trades with carefully vetted suppliers in a number of different countries.

As a computer software company, Messagepoint does not operate in an industry where modern slavery or human trafficking is prevalent but nevertheless is committed to taking steps to uncover any potential risks within its supply chain.

Our Policies

Messagepoint has various policies in place which aim to minimise the risk of modern slavery or human trafficking, and encourage reporting of any related concerns, including:

- **A Robust Procurement Policy.** In addition to the rigorous supplier assessment processes, the Company implemented an additional questionnaire focused on modern slavery activities/signals. The questionnaire is deployed on a risk basis, according to the nature of services provided. The Board reviews the level of responses received.
- Suppliers are required to report what steps they are taking regarding identifying the risk of modern slavery within their particular supply chain which will allow the Company to better

assess the potential risks of modern slavery or human trafficking in its own supply chain.

The Company includes a specific requirement for compliance with modern slavery legislation in its standard terms and conditions and contracting agreements.

- **Vendor Management Program and Policy** defining managing Vendor Risk, including:
 - How to identify vendor risk
 - How to mitigate vendor risk
 - How to monitor vendor risk
 - Who to contact for assistance
- **Code of Conduct.** Messagepoint is committed to conducting business in an open and ethical manner. We accomplish this by creating a workplace built on the strength of trust, accountability, and integrity in all our business practices. It is the responsibility of every employee to build and maintain this code of conduct by supporting, and actively participating in the process
- **Whistleblowing Policy.** Respect and a culture of openness in the workplace is a key aspect of the Messagepoint Code of Conduct. Messagepoint encourages colleagues and other business partners to report any concerns, including any concerns relating to modern slavery or human trafficking.

The **Company's whistleblowing procedure**, utilises a Whistleblower Hot Line (a service monitored by the Board Chairman) which makes reporting easy and confidential.

Training

The Company's Modern Slavery and Human Trafficking Policy has been rolled out to all staff and incorporated into induction training. It includes information on who staff should contact should they have any concerns.

There is additional training for those staff most likely to interact with supply chains with a potentially higher risk of encountering modern slavery.

Company staff are encouraged to report any concerns or suspicions regarding the presence of modern slavery or human trafficking within the supply chain.

Going Forward

Messagepoint recognises that tackling modern slavery and human trafficking requires a continuing year-on-year commitment and will continue to undertake due diligence in our supply chain and review and improve procedures to help identify and prevent the risks of modern slavery or human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Directors on 17 February 2022.



Steve Biancaniello
CEO
Messagepoint Inc.