

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction from the Executive Chairman

Modern slavery is a crime and a violation of fundamental human rights that can manifest itself in various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We will not tolerate any form of deprivation of a person's fundamental rights and freedoms and we are therefore committed to taking appropriate steps to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Organisation's structure

We are a cloud-based Communications Platform as a Service (CPaaS) provider of mobile messaging technology for Mobile Network Operators (MNO's) and enterprise customers worldwide. We are a part of the Soprano Design Group ("Group"), and our ultimate parent company is **Soprano Design Limited**, located in Australia with head office at Level 15, 132 Arthur St North Sydney NSW 2060. The Group is headquartered in Australia, has over 140 employees worldwide and operates in Australasia, Europe, North America, Latin America and Southeast Asia.

The Group has a global annual turnover of more than AUD \$70m (£38m), and it adopts this Modern Slavery and Human Trafficking Statement in the name and on behalf of its Australian parent company and its subsidiaries including **Soprano Design (UK) Limited**.

Our business and supply chains

Soprano Design is a trusted communication software and services company that provides enterprises with the mobile messaging technology they need to maintain and build relationships or deliver mission-critical information. The supply chain we use as part of what we sell to our customers is mainly made up of large and highly regulated companies operating in the telecom sector (MNOs and aggregators) and global IT and cloud providers, such as Hosting Service providers or Service Desk Ticketing providers, which are not in high risk industries. Other than hardware suppliers providing the equipment necessary to conduct our own activity (like computers for our employees), we have no other direct suppliers of materials and goods. Based on this, we believe that the risk of modern slavery in our supply chain is low.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Group's policies listed below reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains:

- **Whistleblowing Policy:** we strive to ensure the highest standards of integrity and promoting a culture of honest and ethical behaviour, corporate compliance and good corporate governance. As part of this commitment we've put procedures in place to ensure that our employees, contractors and suppliers can report any unethical or illegal conduct involving our business.
- **Health and Safety Policy:** we are committed to providing and promoting a safe and hygienic working environment, that minimizes health and safety risks and supports accident prevention for the people we employ or who may be affected by our work.
- **Code of Conduct:** we strive to maintain the highest standards of employee conduct and ethical behaviour when conducting business or managing our supply chain. The Code requires every individual working for or on our behalf to act ethically, conduct business with integrity and comply with legal requirements. It also includes guidance on reporting any questions or concerns relating to ethical issues or legal compliance. We encourage our personnel to disclose any behaviour that could represent a violation of our Code.
- **Anti-Bribery and Corruption Policy:** we are committed to acting ethically and have zero tolerance for bribery and corruption. In accordance with these commitments, and to support ethical behaviours, we have also developed a detailed policy for countering bribery and corruption.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to monitor potential risk areas in our supply chains, including through our standard contract clauses which requires compliance with the law and reserve the right to audits. We encourage and support all employees, contractors and customers to report any suspicion of potential violation or ethical issue without fear of retaliation and through confidential channels that protect whistle blowers.

We have an **Audit and Risk Committee**, who regularly evaluate the adequacy and effectiveness of the Group's legal, regulatory and ethical compliance programs, among other things.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Our Senior Leadership Team shall also take responsibility for implementing this statement and its objectives, and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organization and within the supply chains.

Training

This year we've launched a compliance training program across our business to ensure a high level of understanding of our policies aimed at supporting our employee's understanding of human rights and our ethical behaviour standards, and therefore mitigating the risks of modern slavery and human trafficking in our supply chains and our business.

Everyone who joins our company or is currently working for us must complete training courses on our Code of Conduct and other key company policies, which must be repeated on annual cycles. Our training platform allows us to monitor the number who've completed it and we send training reminders to those employees overdue to complete their training.

Measuring our effectiveness

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Our People and Culture department monitors, at least twice a year, the number of people that completes their mandatory training.
- We encourage our employees' feedback at any time. All of our staff has the chance to use our biannual Global Employee Survey available in multiple languages and completely confidential, to tell us about their experience of working at Soprano Design and help us build a better place to work.
- Our employees are also encouraged to speak up about any ethical issue they're worried about. They can raise concerns if they see something that breaches our policies or the law to their manager, the Company Secretary or our Board members. To date, we have received no reports of modern slavery within our own business or supply chain.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Further steps

We'll continue to improve the work we've taken this year and we intend to take the following further steps to prevent slavery and human trafficking during financial year 2021:

- improve awareness through staff communications; and
- improving the monitoring of suppliers for compliance.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31 June 2020 and has been reviewed and was approved by the Board of Directors of our parent company Soprano Design Limited on 1 July 2020.

DocuSigned by:

Richard Favero

589BC48477274F2...

Richard Favero, Executive Chairman

Soprano Design Group

Date of signature: 02-Jul-20

VERSION CONTROL		
Date	Version	Document
01.07.2020	V1.0	Modern Slavery and Human Trafficking Statement