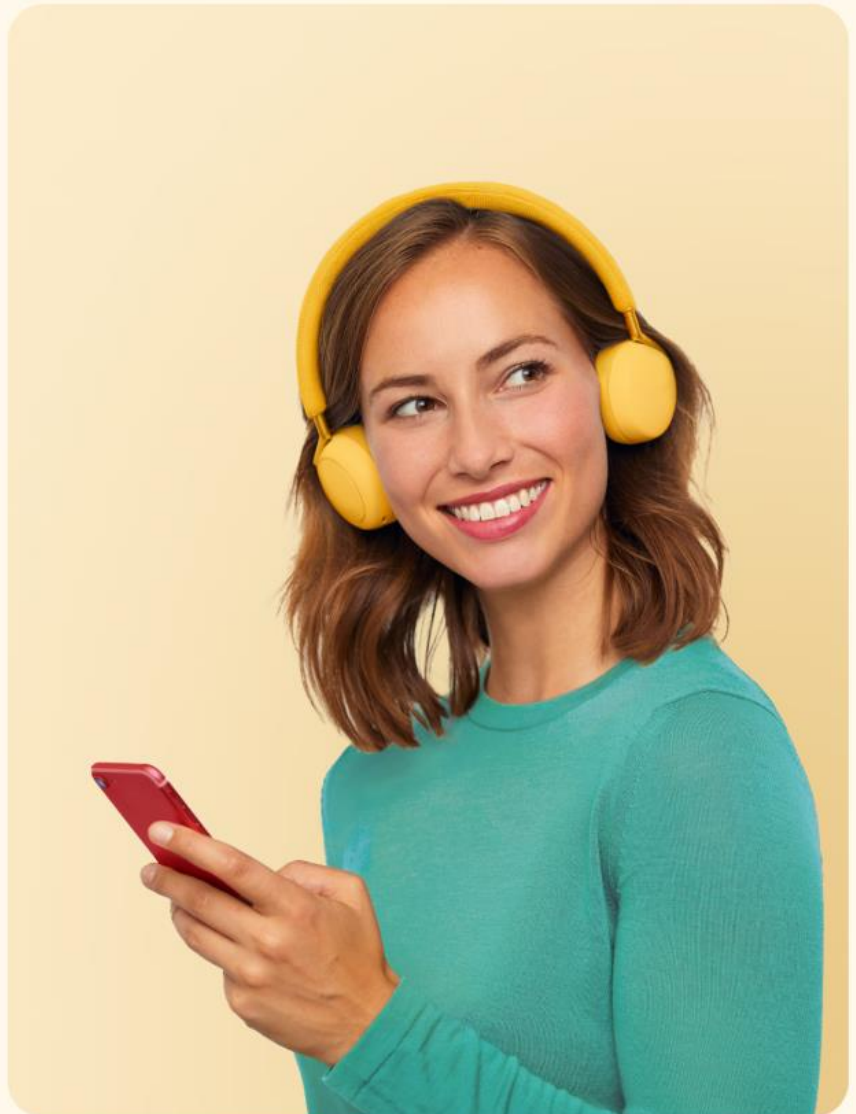




2024/25

# Modern Slavery Statement

Sinch AB. (publ.)



# Contents

<b>Introduction</b>	3
Modern Slavery Statement 2024 – Sinch AB (publ.)	3
Company structure	4
<b>1 Business and organization</b>	5
1.1 Operating segments	5
1.2 Products	5
<b>2 Supply chain</b>	6
<b>3 Modern slavery risks</b>	7
<b>4 Risk assessment</b>	7
4.1 Double materiality assessment	7
4.2 Other types of risk assessment	8
<b>5 Actions to assess and address risks</b>	9
5.1 Due diligence	9
<b>6 Governance and accountability framework</b>	10
6.1 Global regulatory framework	10
6.2 Governing policies	11
<b>7 Assessing our effectiveness</b>	12
<b>8 2025 Focus</b>	12
<b>9 Consultation</b>	12

# Introduction

## Modern Slavery Statement 2024 – Sinch AB (publ.)

Sinch AB (publ), together with its subsidiaries (hereinafter collectively referred to as “Sinch” or the “Group”), does not tolerate any form of modern slavery, forced labour, child labour, or human trafficking. The company is committed to respecting human rights and upholding ethical business practices across its global operations and value chain. This commitment is grounded in Sinch’s core values—Dream Big, Win Together, Keep it Simple, and Make it Happen—which guide its approach to conducting business responsibly and sustainability.

Operating with integrity, transparency, and accountability is essential to maintaining trust with customers, suppliers, employees, investors, and other stakeholders. Sinch recognises that addressing modern slavery risks is an ongoing responsibility and continuously works to assess, strengthen, and embed human rights due diligence in its operations and supply chain.

Sinch communicates its commitment to human rights, ethical sourcing, and stakeholder engagement through its annual Sustainability Report, which is published as a part of the Annual Report. Click [here](#) to read more on the Sinch website.

Sinch acknowledges that, while the risk of modern slavery within its own operations is considered low, risks may exist within complex global supply chains. Efforts to address these risks include engaging with suppliers, enhancing due diligence processes, and strengthening internal controls to uphold internationally recognised human rights standards.

This statement covers the reporting period from 1 January 2024 to 31 December 2024 and outlines the steps taken by Sinch to identify, mitigate, and prevent modern slavery and related risks. It also highlights planned activities for 2025 and reflects Sinch’s long-term ambition to promote fair and ethical business practices globally.

This statement is made on behalf of Sinch AB, in accordance with the reporting requirements of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. Specifically, the following Sinch subsidiaries required to report under the UK Modern Slavery Act 2015:

1. Sinch UK Limited,
2. MessageMedia Europe Limited, and
3. Mailjet SaaS Limited

and the following reporting entities as defined under the Australian Modern Slavery Act 2018:

1. Sinch Communications Pty Ltd (ACN 112 676 132), and
2. its owned and controlled entities including Message4U Pty Ltd (ACN 095 452 062), trading as Sinch MessageMedia.

## Company structure

Sinch UK Limited is a company incorporated in the United Kingdom with its registered offices at Viking House, John Roberts Business Park, Pean Hill, Blean, Kent, England, CT5 3BJ. Sinch UK Limited is wholly owned by Sinch AB (publ.).

Mailjet SaaS Limited (“Mailjet”) is a company incorporated in the United Kingdom with its registered offices at 23 Copenhagen Street, London, England, N1 0JB. Mailjet was acquired by Sinch AB (publ.) in 2021.

Sinch Communications Pty Ltd is a company incorporated in Australia with its registered offices at Suite 8.3, Level 8, 150 Lonsdale Street, Melbourne, Victoria, 3000. Sinch Communications Pty Ltd wholly owns Sinch Australia Holdings Pty Ltd, which in turn owns Message4U Pty Ltd (trading as Sinch MessageMedia).

Since the acquisition of Message4U Pty Ltd (trading as Sinch MessageMedia) and its subsidiaries by Sinch AB (publ.) in 2021, Sinch MessageMedia has continued working with Sinch AB (publ.) to harmonise, align, and adopt business practices and procedures, with a view to become one Sinch. This includes the entity rationalization of dormant entities in the Sinch MessageMedia group as outlined in last year’s Statement.

# 1 Business and organization

Sinch develops cloud-based digital tools that enable businesses to connect with their customers through personalized and timely communications.

Sinch's Customer Communications Cloud offers a broad range of messaging, email, and voice solutions and comprises three core components: the API Platform, Applications, and Network Connectivity services. With 4,077 employees globally, Sinch supports over 175,000 customers across the globe. The business is structured into three operating segments: Americas, EMEA, and APAC.



## 1.1 Operating segments

Americas is Sinch's largest operating segment and contributes to more than 60 percent of consolidated net sales and gross profit. The region includes both North and South America with the US and Brazil being the largest contributing countries. The region employs approximately 1,600 people in total, most of whom are part of Sinch's global organization. Around 450 employees are directly involved in roles focused on serving local and regional customers.

The EMEA operating segment serves Sinch customers across Europe, the Middle East, and Africa with the largest contributing countries being the United Kingdom and France. Sinch has about 1,300 employees in the EMEA region, most of whom are part of the company's global organization. Around 130 employees are directly involved in roles focused on serving local and regional customers.

The APAC operating segment serves Sinch customers throughout the Asia-Pacific region, with India and Australia as the largest contributing countries. The region employs approximately 1,200 people.

## 1.2 Products

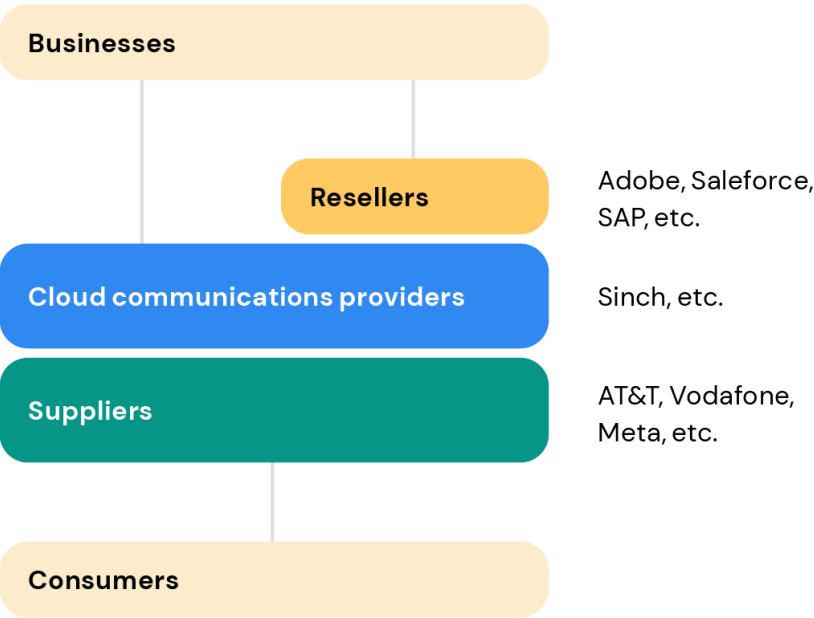
As a complement to the operating segments, Sinch's products are divided into three product categories assessed as being related in terms of sales channels and platforms, similar technology, and a common organizational structure: Applications, API Platform, and Network Connectivity.

Applications is a category of products that target business users and consists of software applications for customer engagement that support use cases across marketing, operations, and customer care.

Products in the API Platform category target developers and product managers. APIs allow businesses to generate mobile messaging, voice calling, and emails, from their own internal or third-party IT systems.

Network Connectivity products target telecom operators and wholesale voice buyers. The portfolio primarily includes voice and messaging interconnect services, operator software, and services.

## 2 Supply chain



Sinch operates within the global market for digital customer communications and assists businesses in their communications with their own customers. In order to reach end users, Sinch relies on suppliers to transmit communication content. The largest category of suppliers is mobile network operators. This supplier category also includes alternative ecosystems, such as messaging apps like WhatsApp operated by Meta. The suppliers charge a fee to terminate the traffic and these fees are essentially the cost of services sold for Sinch. In addition to servicing businesses directly, Sinch also has a significant indirect go-to-market channel where we help and serve businesses through resellers and intermediaries.

Sinch estimates that about 45 percent of the total market for digital consumer communications goes through this indirect channel. These indirect resellers and intermediaries, including large tech platforms such as Customer Relationship Management platforms and marketing software developers as well as more niched service providers, cater for a specific need. These resellers provide digital customer communication to businesses as part of a wider set of services, and Sinch powers these software vendors who serve businesses.

## 3 Modern slavery risks

As a growing company with a diverse global footprint, Sinch recognises that modern slavery risks may arise within its business activities. Sinch is committed to taking responsibility for identifying and reducing any risk of contributing to modern slavery through our operations and supply chains. At Sinch, responsible and ethical business practices are fundamental to how we operate.

## 4 Risk assessment

Sinch takes a structured approach to identifying and managing sustainability-related risks and opportunities, both within its operations and across its value chain. This year, the company conducted its first double materiality assessment to identify sustainability-related impacts and risks across the Group.

### 4.1 Double materiality assessment

In 2024, Sinch conducted a double materiality assessment. Double materiality is defined as the process of identifying and assessing sustainability matters from two perspectives: the external impacts of the company's activities on the environment and society (impact materiality), and the financial risks and opportunities that environmental, social, and governance (ESG) factors may pose to the company (financial materiality). The findings from this assessment were used to inform the further development and refinement of Sinch's human rights and responsible sourcing policies. The assessment encompassed Sinch's own operations, as well as upstream suppliers and downstream business partners across the value chain. Modern slavery risks, including those related to child and forced labour, were evaluated as low.

Outcome of double materiality assessment

	Material topic	Subtopic	Impact, risk or opportunity
E	Climate change	Climate change mitigation	Impact Risk
		Energy	Impact Risk
S	Own workforce	Working conditions	Impact
		Equal treatment and opportunity for all	Impact Risk Opportunity
		Other work-related rights	Impact Risk
	Consumers and end-users	Information-related impacts for consumers	Risk
G	Business conduct	Corporate culture	Impact
		Management of relationships with suppliers	Impact Risk
		Anti-corruption and bribery	Impact Risk
	Information security	Security-related impacts on employees, customers and end-users	Impact Risk

Read more about Sinch’s 2024 double materiality assessment in Sinch’s Annual Report 2024.

4.2 Other types of risk assessment

Sinch’s Procurement function is responsible for the company’s supply chain management with the aim of optimizing costs, mitigating risks, and securing compliance with applicable laws and internal governing documents. The function manages relationships with suppliers and assesses risk factors related to the supply chain. In alignment with Sinch’s Procurement Policy, new suppliers are reviewed based on key criteria.



## 5 Actions to assess and address risks

Sinch carries out due diligence to promote responsible business practices and reduce risks in its supply chain.

### 5.1 Due diligence

Sinch continues to uplift its procurement process to ensure ethical practices throughout the supply chain. Sinch continuously develops and refines its processes for evaluating and selecting the suppliers with which it does business. The Group Procurement function is responsible for Sinch's overall supply chain management and for maintaining an ongoing dialogue with suppliers to ensure alignment with Sinch's standards and strategic priorities.

Procurement activities are coordinated, in line with the Group Procurement Policy, when one or more of the following conditions are met:

1. Monetary threshold
2. Where multiple countries/operations are or could be involved or can leverage from coordinated procurement and/or contract management at a group level; or
3. Where the procurement or contracts are of strategic importance to Sinch

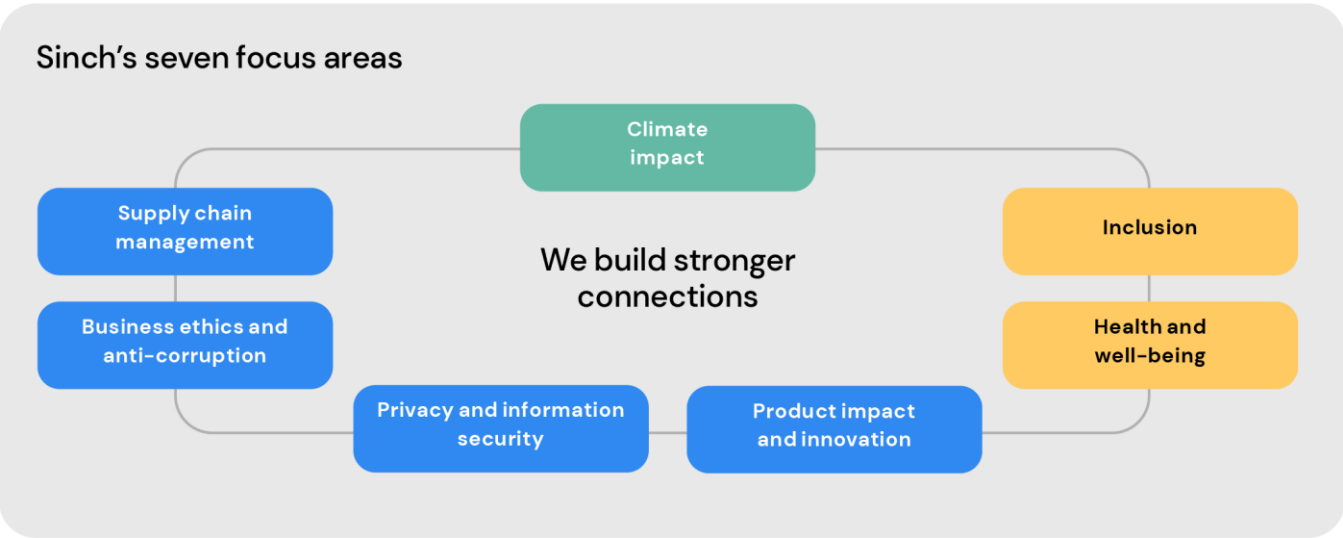
As a general principle, only suppliers deemed selectable—i.e., those meeting Sinch's baseline requirements—are invited to participate in a Request for Quotation (RFQ). RFQs are issued using Sinch standard agreements, based on approved templates where available. The evaluation of submitted tenders is led by an appointed purchasing manager, with suppliers assessed based on technical, project-specific, commercial, and legal criteria.

Prior to signing any contract, due diligence is completed. This may include background checks, financial assessments, sanctions screenings, and reviews of environmental responsibility, in line with Sinch standards.

Where the thresholds of the Group Procurement Policy are not met, Sinch still adheres to the basic purchasing principles outlined in Group Procurement Policy. All related documents—such as RFQs, contracts, evaluations, and reports—must be properly stored and made accessible to the Sinch Group Procurement department upon request.

## 6 Governance and accountability framework

Sinch’s approach to sustainability is supported by a governance framework. This includes alignment with global standards, internal policies, supplier requirements, and ongoing training to ensure responsible and ethical business practices across the organization.



### 6.1 Global regulatory framework

In 2024, Sinch published its sustainability report inspired by the Corporate Sustainability Reporting Directive (CSRD), informed by the outcomes of its double materiality assessment conducted in the same year. This assessment formed the basis for Sinch’s sustainability framework, which identifies seven key focus areas structured under three strategic pillars: *Our Planet*, *Our People*, and *Our Business*. The framework is embedded into company operations and aligns sustainability efforts with broader business objectives to create both short- and long-term value for stakeholders.

As a member of the UN Global Compact (“UNGC”), Sinch supports the Ten Principles for responsible business with regards to human rights, labour, environment, and anti-corruption. An annual Communication on Progress (CoP) is published, which describes the implementation of the Ten Principles and how Sinch is working to contribute to the UN Sustainable Development Goals (SDGs). Sinch’s sustainability work is annually evaluated via EcoVadis, which assesses the quality of corporate policies, actions, and outcomes in the areas of the environment, labour and human rights, ethics, and sustainable procurement. In 2024, Sinch participated in Sustainalytics, MSCI ESG and ISS ESG ratings.

## 6.2 Governing policies

All governing documents are applicable to the entire Group and are available to all employees via Sinch's intranet.

**The Code of Business Ethics and Conduct** applies to all employees, consultants and the board of directors. The Code of Business Ethics and Conduct, renewed in April 2025, is required to be read and acknowledged by all employees, directors, and consultants working with, for, or on behalf of any Sinch legal entity. The Code of Business Ethics and Conduct is re-acknowledged annually and all employees, directors, and consultants are required to complete training related to the same. Prior to April 2025, Sinch had a Code of Conduct which served a similar purpose with required signing upon beginning with the company. The Code of Business Ethics and Conduct is based on the ten principles of the United Nation's Global Compact (UNGC) and clarifies Sinch's position on the importance of sound business practices.

**Supplier and Partner Codes of Conduct** are appended to contracts above relevant thresholds between Sinch entities and suppliers and partners, respectively. The Supplier and Partner Codes of Conduct clarify Sinch's ethical business principles, which are required for Sinch's suppliers and partners, ensuring alignment with Sinch's ethical and sustainability commitments.

### Speak up

Sinch's whistleblower reporting line, SpeakUp, is managed by a third-party vendor and is available to all employees and individuals working on behalf of Sinch. The system allows for anonymous reporting, where permitted by local law. All concerns and reports are sent directly to the Vice President of Group Ethics and Compliance, who independently assesses each case to determine if the reported issue may constitute a violation of Sinch's Code of Business Ethics and Conduct or local law and oversees all internal investigations.

Whistleblower concerns are reported to the Audit Committee on a quarterly basis. 21 issues were reported in 2024, of which 6 were substantiated concerns that were actioned. This helps deter wrongdoing in operations by encouraging disclosures and ensuring that anyone who makes a disclosure can do so safely, securely, and with confidence that they will be protected and supported.

## 7 Assessing our effectiveness

Sinch remains committed to assessing the effectiveness of its efforts through a range of internal and external practices. These include engaging relevant leadership, reflecting on approaches as the company's operations evolve, considering broader industry perspectives, and monitoring general indicators that support understanding of progress in managing modern slavery risks across the business and supply chain.

## 8 2025 Focus

As discussed previously, risk assessments performed indicated that modern slavery risks, including those related to child and forced labour, were low. Despite this, Sinch will continue to assess such risks and implement measures designed to mitigate any theoretical risks moving forward. Additionally, Sinch plans to develop and refine the screening and assessment process for both new and existing suppliers and partners, complementing existing financial, risk, sustainability and compliance screenings.

In 2025, Sinch will introduce an updated Business Partner Code of Conduct that reinforces upholding human rights and actively combating modern slavery.

As part of Sinch's ongoing efforts to improve Global Procurement, Sinch is updating the Procurement Policy and Purchasing Principles to clarify roles and responsibilities and make the procurement process more accessible and easier to follow.

In addition, Sinch aims to introduce a Pre-Procurement Form including ESG criteria to be completed before initiating any procurement process. The purpose of this form is to support a clear, well-defined, and fit-for-purpose procurement process by ensuring the appropriate support functions are involved at the right time using a risk-based approach.

## 9 Consultation

During the Reporting Period, there was active consultation and collaboration between the reporting entities under both the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018, in the development of this Modern Slavery Statement.

Sinch subsidiaries required to report under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018, as previously defined, were involved in the consultation process.

Prior to being put to the Board for approval, this Statement was reviewed by Sinch's Chief Executive Officer, Executive Vice President APAC, Executive Vice President EMEA, Chief Legal Officer, Chief Financial Officer, Vice President Group Ethics & Compliance, Head of Sustainability and Head of Procurement.

This Statement was approved by the Board of Sinch AB (publ) on 26 June 2025.

This statement is signed by Björn Zethraeus as Director of Sinch AB (publ).

Signature

DocuSigned by:  
  
BB90E960C6194E3...

Name: Björn Zethraeus

Title: Director of Sinch AB (publ).