

Campaign Monitor (Holdings) UK Limited  
UK Modern Slavery Act Transparency Statement

This Statement is published in accordance with section 54(1) of the United Kingdom Modern Slavery Act 2015 (the “**Act**”) on behalf of Campaign Monitor (Holdings) UK Ltd [(“**Campaign Monitor**”)], and its subsidiaries, including Delivra, Inc., Emma, Inc., Sailthru, Inc., Liveclicker, Inc., and GetFeedback, Inc. (together the “**CM Group**” or “**we**”) for the current financial year.

The CM Group was created to offer web-based marketing solutions to marketers, and has offices in the United Kingdom, United States, Australia, New Zealand, and Uruguay.

The CM Group is committed to acting responsibly, ethically and with integrity in all aspects of our business. This includes, in particular, ensuring that the CM Group does not act in a way that might give rise to the furtherance of servitude or modern slavery.

We have considered the risks of modern slavery arising out of our business activities and have concluded that this risk is low based on the nature of our business and our supply chain.

CM Group’s supply chains comprise service providers of other web based technologies which are incorporated into our core products. Other aspects of CM Group’s supply chains comprise professional services, information technology, office suppliers, facilities maintenance, catering and hospitality services.

CM Group will engage with its suppliers in an effort to eliminate modern slavery in our business and supply chains and promote the positive behaviours outlined in the Act. CM Group already has a variety of policies and procedures designed to promote its commitment to corporate governance and ethical behaviour included in the CM Group employee handbooks. Further, the CM Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

We will consider appropriate targeted training on modern slavery for certain employees where necessary. This will enable us to better understand our role in mitigating the risks of modern slavery. We will also update our existing policies to specifically address the risks of modern slavery.

CM Group’s General Counsel takes responsibility for overseeing our modern slavery efforts. This Statement will be reviewed annually and updated as necessary.

The CM Group leadership team and Board of Directors approved this Statement on 25 March 2019.

This Statement has been authorised by:

Signature:



Name:

Adam Berger

Position:

Chairman of the Board of Directors

Date:

25 March 2019