



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT<sup>1</sup>

### INTRODUCTION

INFOBIP Ltd (“Infobip”, “Company”) is a global cloud communications platform that enables businesses to build connected customer experiences across all stages of the customer journey at scale, with easy and contextualized interactions over customers’ preferred channels.

Accessed through a single platform, Infobip’s omnichannel engagement, identity, user authentication, security and contact center solutions help clients and partners overcome the complexity of consumer communications, grow their business, and increase loyalty– all in a fast, secure, and reliable way.

With over a decade of industry experience, Infobip has a team of more than 2600 employees in 65+ offices on six continents offering natively built technology with the capacity to reach over seven billion mobile devices and ‘things’ in 190+ countries connected to over 800 telecom networks.

The company serves and partners with leading mobile operators, messaging apps, banks, social networks, tech companies, and aggregators.

### OUR COMMITMENT<sup>2</sup>

Infobip seeks to operate respectfully, legally, fairly, ethically and with integrity in all business relationships. We maintain a commitment to respecting and promoting human rights and recognize the importance of eliminating slavery and human trafficking and are fully dedicated to a work environment that is free from modern slavery or human trafficking in our business operations. We endeavor to engage with companies that embrace similar values and respect for human rights.

Infobip supports the protection of human rights and is guided by fundamental principles such as the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions.

We are committed to monitoring our practices to ensure that slavery and human trafficking are not taking place in our supply chain or any other part of our operations. This statement is our public commitment that no slavery or human trafficking will knowingly be permitted, supported, or endorsed through our operations.

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<sup>1</sup> This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and Constitutes INFOBIP Ltd’s Slavery and Human trafficking statement for the financial year ending on 31st December 2020

<sup>2</sup> For the purposes of this statement, references to slavery and human trafficking are based upon the definition in the UK Modern Slavery Act 2015



## ENGAGING WITH SUPPLIERS

Infobip interacts with various suppliers across a wide range of sectors, including partnering with many of the global leaders in telecommunications, IT network and equipment, information technology, marketing, insurance, facilities management, travel cost and services etc. Infobip also works with a number of professionals, consultants, and contractors.

Infobip understands that the risk of slavery and human trafficking in our business and direct supply chain is low. Part of our Code of Conduct is the respect for human rights, support of our environmental sustainability and diversity and inclusion. This year we are committed to ensuring that our suppliers operate in compliance with the laws of their respective country.

We will encourage our suppliers to obey to standards set by international human rights, especially when it comes to workers' rights. These behaviours and practices consider specifically:

- **Health and Safety** – provision of a safe and hygienic working environment that minimizes health and safety risks and supports accident prevention for all personnel.
- **Freely Chosen Employment** – ensuring that all work is completed voluntarily. Personnel should not be forced, bonded, indentured or subject to threat or involuntary prison labour.
- **Avoidance of Child Labour** – child labour should not be employed. The term “child” refers to any person less than 15 (or 14 where the law of the country permits) years of age unless the minimum age for work or mandatory schooling is stipulated as being higher by local law.
- **Working Hours** – ensuring that all workers are entitled to work and be paid for a minimum level of working hours; that working hours are not excessive; and that maximum working hours comply with national laws.
- **Wages and Benefits** – being responsible for employee compensation and payment of fair wages. All employees should be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher. Any overtime should be voluntary and compensated appropriately.
- **Employee Freedom of Association** – respecting the rights of workers in relation to freedom of association.

We ensure our business practices are continuously reviewed and we will apply a robust approach to the management of existing suppliers as well as the identification and selection processes for all new suppliers to mitigate and manage any potential risks.

This year we are committed to ensuring that Infobip global procurement professionals are aware of and reinforcing with suppliers our commitment to the UK Slavery Act 2015.



## EDUCATION AND TRAINING

Our approach for respecting human rights and the UK Modern Slavery Act, aligns with our global policies which include but are not limited to;

Code of Conduct, Health and Safety policy, Anti-Discrimination and Harassment policy, Disciplinary Code, Social Media Policy, Global Anti-Bribery and Corruption Policy. These policies and more govern our day- to-day activities and are hosted on our intranet.

Our Code of Conduct is communicated to all our employees via the intranet and all our employees are required to read and acknowledge the code. We encourage our employees to take appropriate action by reporting and disclosing any behaviour which would represent the violation of our Code.

As part of our training, the Employer's Staff Handbook contains the employment policies and practices prepared to comply with all relevant legislation in the UK, including, but not limited to Equal Opportunity Policy, Bullying and Harassment Policy, Health and Safety, Maternity Leave Policy, Paternity Leave policy, Shared Parental Leave Policy, Parental Leave Policy, Dependant Leave Policy, Health and Safety Policy, Retirement Policy, Whistleblowing policy, Disciplinary rules and procedures and other.

## DUE DILLIGENCE

As part of our commitment to identify and mitigate risk our due diligence includes the following:

- **CODE OF CONDUCT** – includes requirements on ensuring that our suppliers mirror our values in relation to those topics. We reserve the right not to do business with suppliers if we find any violations of this policy.
- **CONTRACTS** – our standard contract templates include a condition that suppliers will comply with all applicable laws. This ensures that any commitments made at the due diligence stage are underpinned by a contractual requirement and legally enforceable. Furthermore, in our contracts, we include clauses specifically relating to anti-bribery. These clauses include, amongst other things mutual commitments to comply with applicable laws relating to bribery and corruption.
- **RECRUITMENT/EMPLOYMENT CONTRACTS** – robust recruitment processes in line with applicable laws and regulations of the respective countries in which we operate and employ, always in perspective of protecting fundamental human rights. Infobip prohibits forced labour, including child labour. The Company does not use children in any economic activities and does not allow minors to engage in any work contrary to the child employment regulations, but does offer them consideration and support, including the opportunity to receive education.
- **WHISTLE-BLOWING** – in line with our Whistleblowing policy we require our employees to report any violation of our Code and of other our policies, and we encourage them to speak up about any concerns, which could include concerns relating to human rights or modern slavery.



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- **HUMAN RESOURCES** – the Human Resources department sends periodical surveys to all our employees worldwide to measure the degree of their satisfaction with their work conditions and overall work environment. All the answers obtained are strictly anonymous.

## TRAINING

Upon commencement of the employment, all employees are made aware of the Infobip's policies relating to standards of behavior that Infobip requires from them via email and through The Infobip Academy, a two-week training session that is mandatory for all employees to complete. This year we are committed to providing focused training on our expectation with regards to modern Slavery and Human Trafficking to relevant staff.

## FURTHER STEPS

We acknowledge that the risks of modern slavery are dynamic and change quickly. Therefore, despite our low risk of slavery and human trafficking assessment (in our business and supply chains as well), we aim to periodically review the effectiveness of the relevant policies and procedures that we have in place and we will continue with implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our business or supply chains. We will monitor and take a continuous improvement approach to doing this and we will aim to prioritize improvement processes that will prevent our direct or indirect support for any act of modern slavery.

## APPROVAL

This statement, which will be reviewed annually, has been approved by the Board of Directors of INFOBIP Ltd and is published on the INFOBIP website.

  
Izabel Jelenic, director  
INFOBIP



1.04.2021.