Introduction
This statement has been produced in accordance with section 54(1) of the United Kingdom Modern Slavery Act 2015. It sets out the actions that Platinum Topco Limited and subsidiaries will take, to understand potential modern slavery risks related to its business activities and supply chain. This statement relates to actions and activities during the financial year ending 31 December 2023.

Platinum Topco Limited with the trading name Smart Communications™ is the leading cloud-based platform for enterprise customer communications.

Smart Communications™ is committed to preventing modern slavery in its business activities and its supply chain and detailed below are actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

We have a zero-tolerance approach to slavery and human trafficking. We are committed to ensuring our supply chain and our business is free of slavery and/or human trafficking. Our modern slavery statement is delivered through a range of associated policies and procedures, namely:

- Code of business Conduct and Ethics policy;
- Vendor Management Policy;
- Fair Treatment policy;
- Health and Safety at work policy;
- Learning and Development policy; and
- Whistleblowing policy.

Smart Communications™ has around 400 staff, based in the United Kingdom, USA, Australia, Germany, Switzerland, Austria and Singapore. Our staff are largely directly employed and are not in any category which is seen to be vulnerable to modern slavery in these countries.

Our supply chains and supplier adherence to our value
The relationship with a majority of our suppliers has been established over several years. When we acquire goods or services from new contractors or suppliers, we pre-qualify them through our due diligence process. Amongst other things, we look at a supplier's company performance, compliance with applicable rules and regulations, modern slavery statement.

To date, we have not discovered or been made aware of any human trafficking or slavery activities within our supply chain. However, if any were to be highlighted to us, we would act immediately in accordance with our legal and moral obligations.

Due diligence process
We have systems in place to ensure:

- individuals have the right to work in the country of employment;
- as a minimum, a living wage is paid;
- that working hour restrictions are complied with;
- that bullying, discrimination and harassment is not permitted or tolerated in any form;
- working environment conditions are safe;
- we identify and assess potential risk areas when considering new suppliers;
- we regularly review our existing supply chains;
- we mitigate the risk of slavery and human trafficking occurring in our supply chains;
- we monitor potential risk areas in our supply chains; and
- we protect whistleblowers.

With regards to our supply chain, we issue supplier questionnaires to our key suppliers to enable us to undertake compliance checks in accordance with our internal requirements and legal requirements including but not limited to modern slavery, fraud.

Adherence to our values
To ensure all business activity and those in our supply chain comply with our values, we have in place a rigorous compliance programme. We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal
- Information Security and Compliance
- Human Resources
- Finance

Training
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all our staff.

For and on behalf of the Board

James Brown
Executive Chairman
Platinum Topco Limited

Date: 23 / 04 / 2024