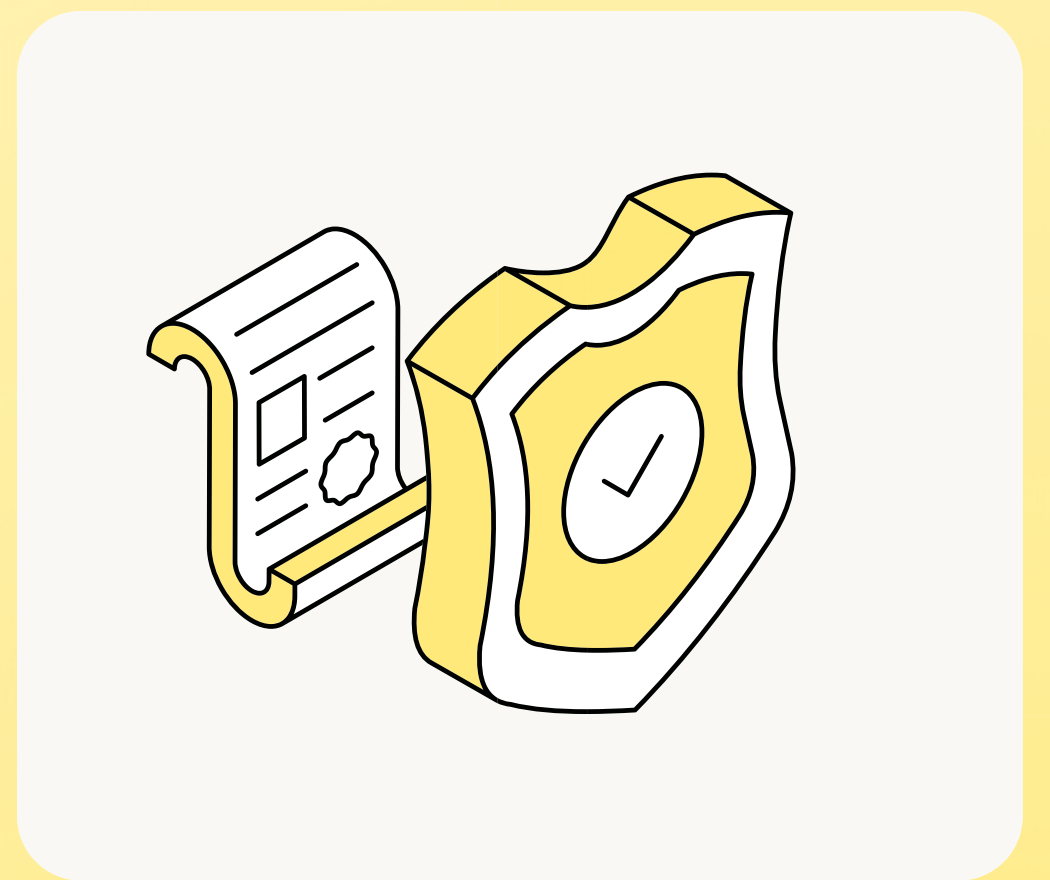


2025

# Modern Slavery Statement

Sinch AB (publ)





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# Introduction

## Modern Slavery Statement 2025 – 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 labor, child labor 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, which guide its approach to conducting business responsibly:



**Dream big**



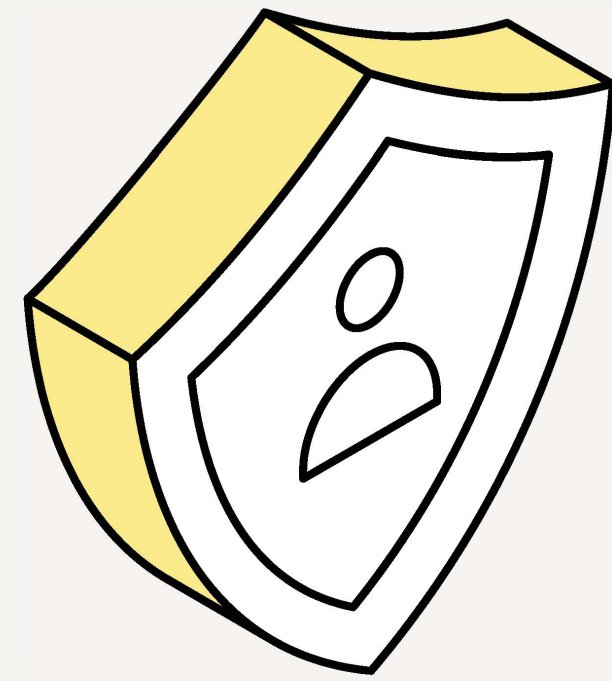
**Keep it simple**



**Win together**



**Make it happen**



Operating with integrity, transparency and accountability is essential to maintaining trust with customers, suppliers, employees, investors and other stakeholders. Sinch recognizes 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 part of the Annual Report. The report is available for download from [investors.sinch.com](https://investors.sinch.com).

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 recognized human rights standards.

This statement covers the reporting period from January 1, 2025, to December 31, 2025, and outlines the steps taken by Sinch to identify, mitigate and prevent modern slavery and related risks. It also highlights planned activities for 2026 and reflects Sinch’s long-term ambition to promote fair and ethical business practices globally.

This statement is made on behalf of Sinch AB (publ), 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 are 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 its owned and controlled entities,
2. Including Message4U Pty Ltd (ACN 095 453 062), 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 Holding Pty Ltd, a company incorporated in Australia, which in turn owns Message4U Pty Ltd (trading as Sinch MessageMedia), a company incorporated in Australia.

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 harmonize, align and adopt business practices and procedures, with a view to becoming one Sinch. This includes the entity rationalization of dormant entities in the Sinch MessageMedia group as outlined in the previous year's statement. Message4U Pty Ltd owns seven companies as of the date of this statement.



## Business and organization

Sinch powers over 900 billion interactions annually for more than 200,000 customers across the globe. Leading global companies, including AI innovators, rely on Sinch to strengthen customer relationships and deliver seamless experiences across messaging, voice and email. Profitable since its founding in 2008, Sinch generated net sales of SEK 27.1 billion in 2025 and has over 4,000 employees in 59 countries, with headquarters in Stockholm.

The business is structured in three geographical regions, which make up Sinch's operating segments: Americas, EMEA and APAC. As a complement to the operating segments, Sinch's products are divided into three product categories that are related in terms of sales channels, platforms, technology and organizational structure: Applications, API Platform and Network Connectivity.

## Operating segments

Americas is Sinch's largest operating segment and contributes to approximately 63 percent of consolidated net sales and gross profit. The region includes both North and Latin America with the US and Brazil being the largest contributing countries. The region employs 1,582 people in total, most of whom are part of Sinch's global organization.

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 1,230 employees in the EMEA region. The APAC operating segment serves Sinch customers throughout the Asia-Pacific region, with India and Australia as the largest contributing countries. The region employs 1,228 people.

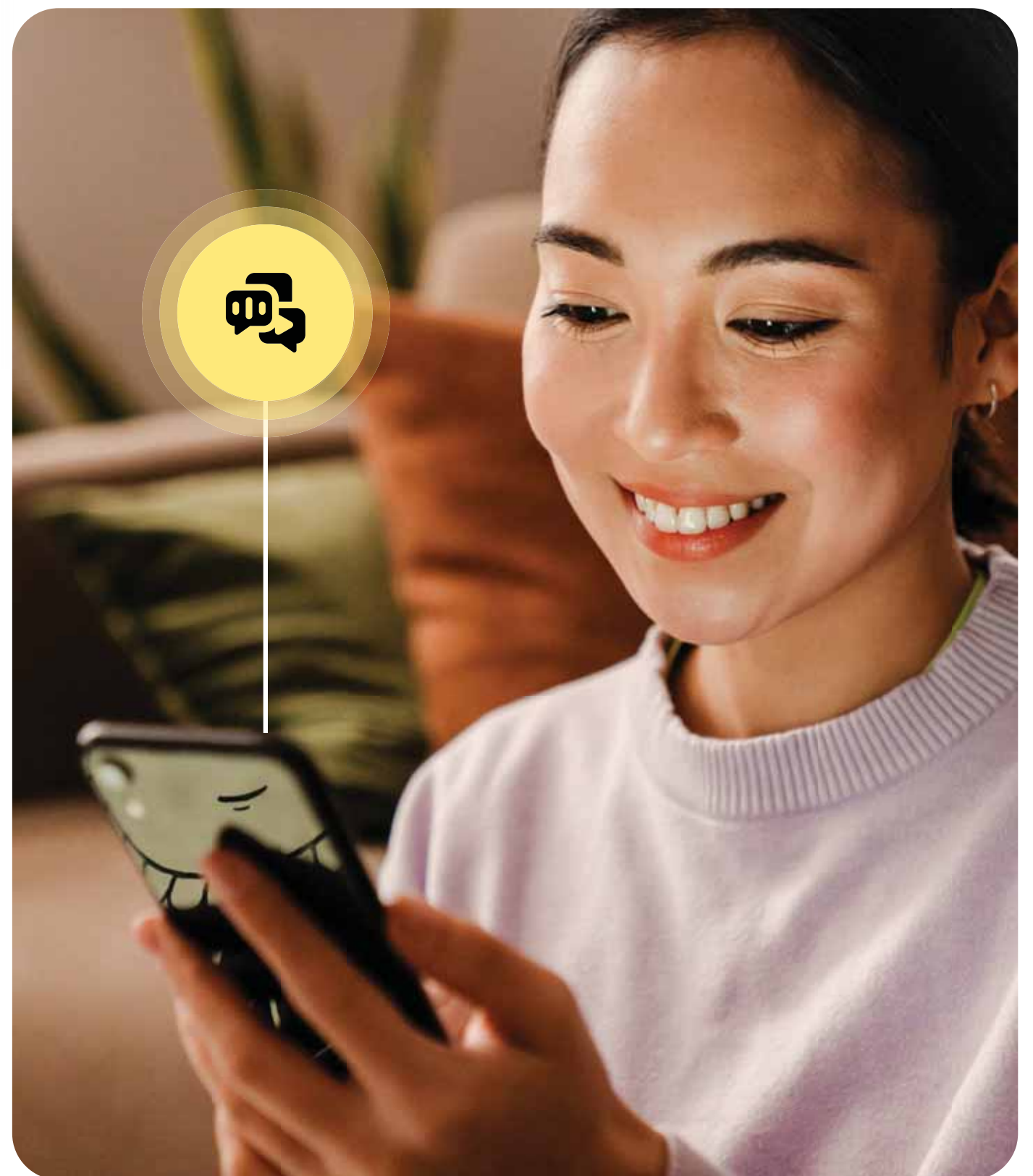
## Products

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 targets business and users and consists of software application for customer interaction, such as email and SMS-based marketing campaigns. Products in the API Platform category target developers and businesses with high IT maturity. APIs enable businesses to generate mobile messaging, voice calls and email using Sinch cloud services. Network Connectivity mainly targets telecom carriers. The portfolio includes services to manage carrier-to-carrier voice calls, emergency calls and SMS-related software.

# Supply chain

Depending on the type of product, Sinch can either connect directly with the end user or work with suppliers that manage the final stage of the content delivery through their own infrastructure. For email services, Sinch connects directly with the end user, while messaging is delivered through suppliers. The largest supplier group is the telecom operators, but this category also includes ecosystems such as messaging apps like WhatsApp, operated by Meta. Suppliers charge a fee to terminate the traffic, and these fees constitute our cost of services sold.

Overall, suppliers can be categorized as Tier 1 or Tier 2. Tier 1 suppliers include telecom operators, cloud services and data center providers, software and application vendors and professional service firms such as IT, legal, financial and HR consultants. These suppliers support Sinch's global platform operations and corporate functions. Tier 2 suppliers provide IT hardware and equipment underpinning data centers, offices and telecom operations, including servers, networking components and employee devices. Sinch expects all suppliers to apply responsible sourcing practices and energy-efficient technologies.



# Risk assessment

As a growing company with a diverse global footprint, Sinch recognizes 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 its operations and supply chains. At Sinch, responsible and ethical business practices are fundamental to how the company operates.

Sinch assesses modern slavery-related risks as part of its double materiality assessment process, as well as through other relevant risk reviews.



## Double materiality assessment

In 2025, Sinch updated its double materiality assessment. A double materiality assessment 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 labor, were assessed as low.

Read more about Sinch's 2025 double materiality assessment in Sinch's Annual Report 2025.

## Other risk assessments

During 2025, Sustainability and Procurement functions jointly conducted a human rights risk assessment of suppliers exceeding the defined monetary threshold, to identify those presenting a higher risk of modern slavery. The assessment considered key risk factors, including country risk (such as governance, corruption, human rights conditions and labor rights enforcement) and sector-specific exposure to labor rights risks. The assessment identified no material modern slavery risks within the upstream supply chain.



# Due diligence and remediation process

## Supply chain management

Sinch continues to enhance its procurement process to ensure ethical practices throughout the supply chain, including addressing risks related to modern slavery. Sinch's global supply chain includes key partnerships with telecom operators and providers of services such as Infrastructure as a Service (IaaS) and Software as a Service (SaaS). Sinch views supplier relationships as long-term partnerships built on transparency, accountability and shared progress.

The Procurement function, together with relevant group functions, oversees all supply chain activities to optimize value, mitigate risk and align with sustainability goals. Procurement activities are coordinated in line with the Group Procurement Policy when one or more of the following conditions are met: a monetary threshold is exceeded; where multiple countries or operations are or could be involved or can leverage from coordinated procurement and/or contract management at a group level; or where the procurement or contracts are of strategic importance to Sinch.

As a general principle, only suppliers deemed selectable such as, those meeting Sinch’s baseline requirements such as compliance with applicable laws and regulations and alignment with Sinch’s standards, including the Supplier Code of Conduct, 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.

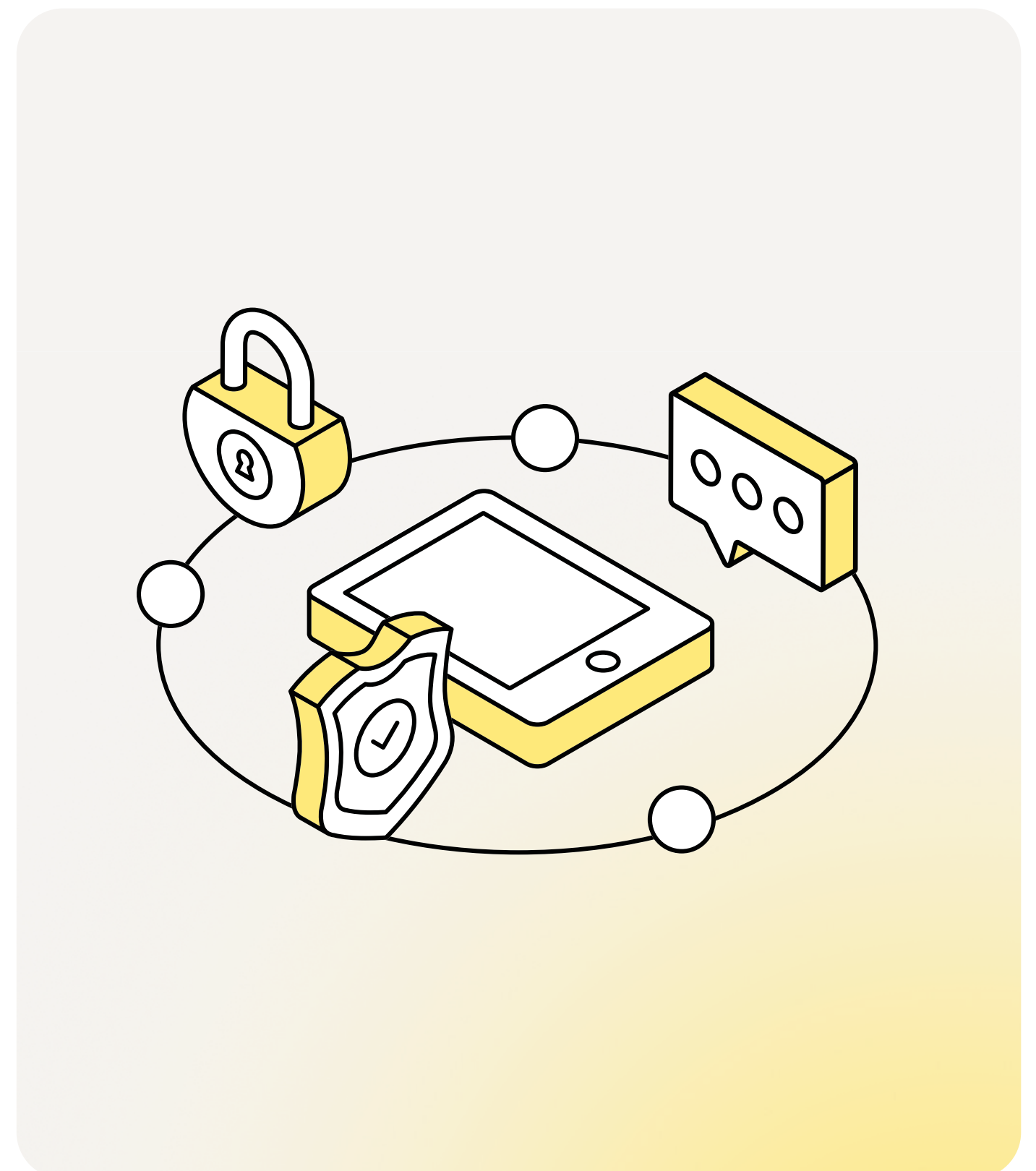
Prior to signing any contract, due diligence is completed. This may include background checks, financial assessments, sanctions screenings and reviews of environmental responsibility, in line with Sinch standards. Sustainability is embedded in Sinch’s supplier selection and management processes, guided by the Group Procurement Policy and Supplier Code of Conduct. Additionally, in 2025, Sinch developed a methodology for pre-assessing all new suppliers above a specific monetary threshold based on ESG risks, including modern slavery related risks, as a step to enhance the integration of ESG risk assessment into the overall supply chain due diligence process. This work fulfills the commitment made in our 2024 statement to introduce a pre-procurement assessment process for suppliers.

Where the thresholds of the Group Procurement Policy are not met, Sinch still adheres to the basic purchasing principles outlined in the 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.

## Supplier engagement

Continuous engagement reinforces expectations, drives improvement and ensures compliance with sustainability standards. Sinch screens new suppliers, partners and operators for sanctions, embargoes and potential reputational concerns when onboarding and on an ongoing basis. These efforts prioritize higher-risk third parties, ensuring that the scope and depth of reviews are aligned with the level of risk. Engagement decisions for higher-risk parties are escalated to senior management. Nonconformities are addressed through corrective action plans, which are closely monitored for effectiveness. In cases of persistent non-compliance, Sinch is prepared to terminate the partnership to protect corporate values and uphold the integrity of the supply chain. This approach ensures that Sinch’s sustainability practices are embedded in every stage of the procurement lifecycle.

During 2025, Sinch further strengthened and formalized sustainability criteria in the due diligence process for new and existing suppliers. This work is aligned with the updated Code of Business Ethics and Conduct, the Supplier Code of Conduct and the Procurement Policy. ESG risks and pre-assessments were mapped for current suppliers during the year. This used a risk-based approach and a materiality threshold of annual contract values exceeding SEK 10 million (Swedish Krona), in line with Procurement Policy.



# Governance

Sinch's sustainability strategy provides the strategic direction for the company's sustainability work, including responsible business conduct and human rights. The strategy is supported by a governance framework.

## Global regulatory framework

Sinch published its 2025 Sustainability Report in accordance with the Corporate Sustainability Reporting Directive (CSRD). The report was subject to limited assurance by an external auditor. The company's sustainability performance is evaluated annually by EcoVadis, which assesses the quality of corporate policies, actions and outcomes across environmental impact, labor and human rights, ethics, and sustainable procurement. In 2025, Sinch also participated in ESG ratings conducted by Sustainalytics, MSCI ESG and ISS ESG. In addition, Sinch reports to CDP and publishes disclosures aligned with its framework as part of its ongoing commitment to transparency and accountability in sustainability reporting.

## Policies

Governing documents stated below are applicable to the entire company and are available to all stakeholders via Sinch's internal portal, with selected documents also accessible to external stakeholders through Sinch's external website.

### Code of Business Ethics and Conduct

The Code of Business Ethics and Conduct translates Sinch's mission and values into principles for ethical and responsible business conduct. The Code of Business Ethics and Conduct applies to all individuals working for or on behalf of Sinch. It aligns with internationally recognized standards, including the:

- UN Universal Declaration of Human Rights
- Core conventions of the ILO
- OECD Guidelines for Multinational Enterprises
- Ten Principles of the UN Global Compact.

In 2025, Sinch updated its Code of Business Ethics and Conduct to further strengthen its commitment to responsible business practices. The updated policy includes explicit principles on human rights, stating that across all operations worldwide, Sinch works diligently to avoid causing or contributing to human rights abuses, including slavery and human trafficking, and to address such issues promptly and transparently.

To support the implementation of the updated policy, Sinch launched a workforce training program in 2025. The program is conducted annually and is designed to reinforce the company's values and its commitment to ethical behavior and accountability across the organization.

### Supplier Code of Conduct

The Sinch Supplier Code of Conduct ensures that all suppliers meet Sinch's standards for responsible, ethical and sustainable business practices. It applies to all companies providing goods or services to Sinch and its subsidiaries. It also applies to those acting on behalf of these companies, including board members, employees, consultants and other staff. The policy was reviewed in 2025, with the updated Business Partner Code of Conduct scheduled for formal approval in 2026.

### Procurement Policy

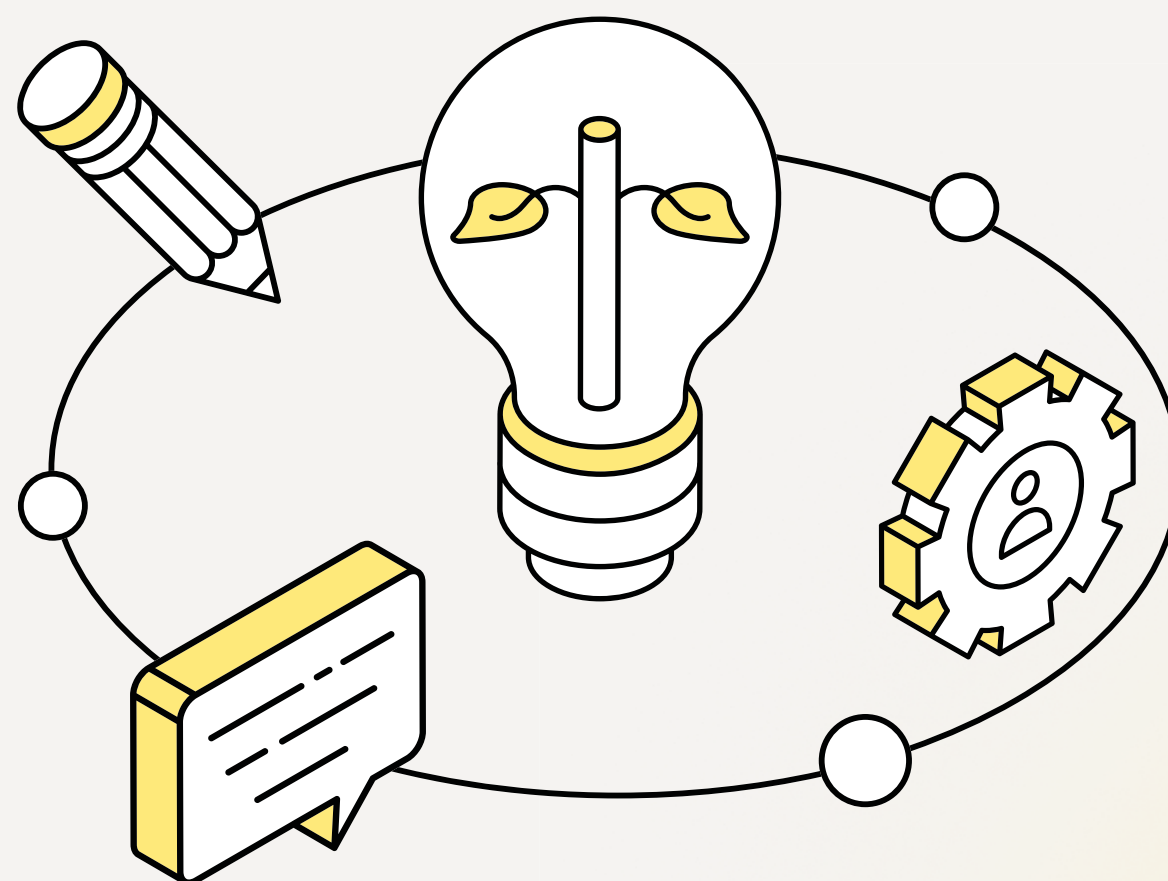
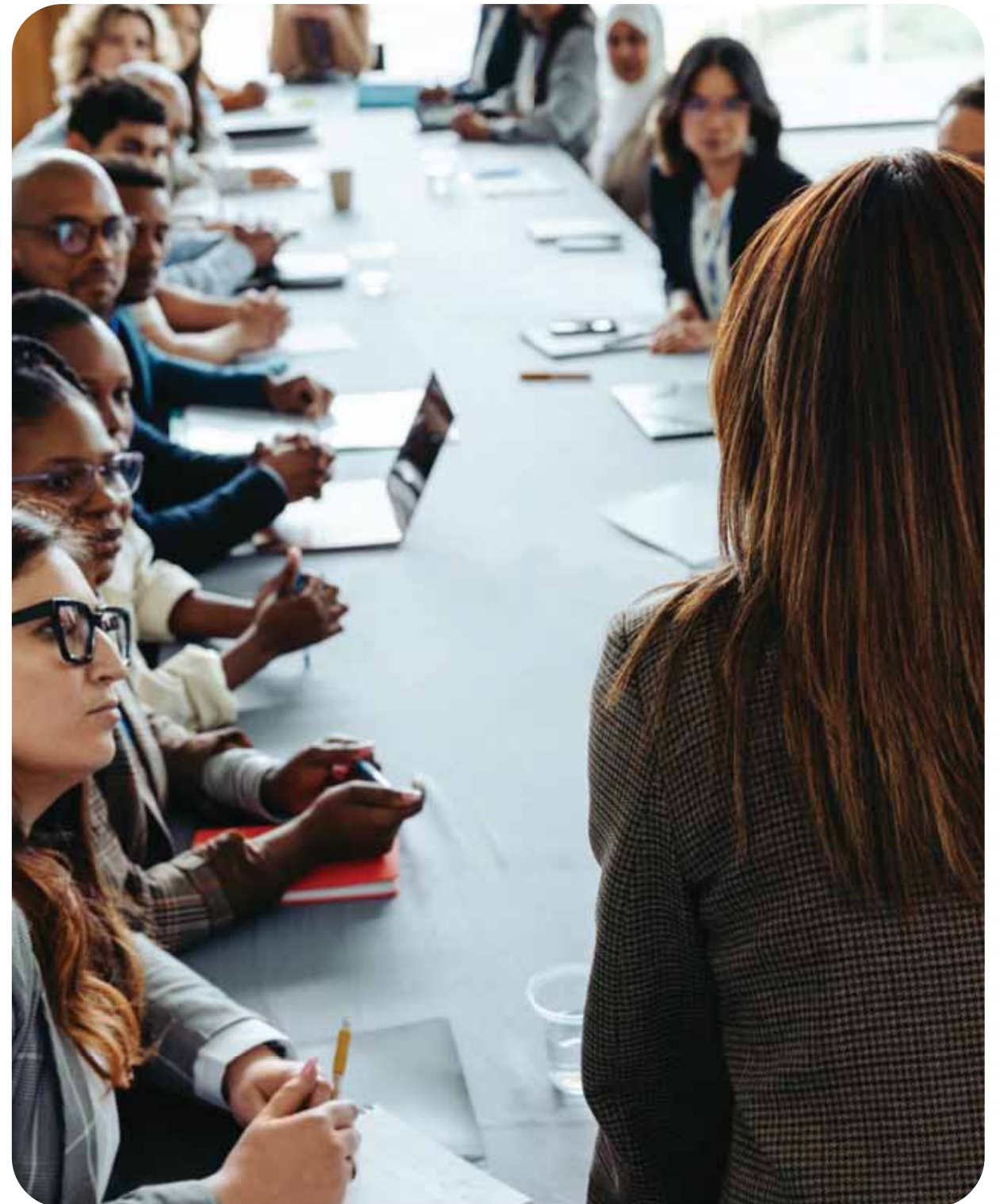
Sinch Procurement Policy was updated in 2025 to clarify roles and responsibilities and make the procurement process more accessible and easier to follow. The Procurement Policy is the document guiding supply chain management at Sinch and applies to all Sinch employees and consultants and is owned by the Chief Financial Officer (CFO). It outlines the requirements for procurement and defines when Sinch Group Procurement must be involved. In 2025, Sinch updated its global Procurement Policy to integrate ESG management with supplier evaluation and relationship management. The due diligence process is risk based, so the company can focus on suppliers that present higher potential risks to people, the environment or business integrity.



# Assessing 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.

In 2025, Sinch continued to strengthen its commitment to integrity and ethical business practices through its whistleblower reporting channel. The channel allows employees and external stakeholders to make anonymous reports of misconduct, where permitted by local law, through both internal and external channels. All concerns and reports are sent directly to the Ethics and Compliance function, which independently assesses whether each case may constitute a violation of Sinch's Code of Business Ethics and Conduct or applicable laws.



## Focus for 2026

Risk assessments indicate that the likelihood of modern slavery risks, including child and forced labor, is low. Despite this, Sinch will continue to assess such risks and implement measures designed to mitigate any theoretical risks. Going forward, Sinch will continue to strengthen its supplier assessment methods and further integrate ESG evaluations into its procurement processes and systems as part of implementing the updated Procurement Policy. This will support the development of a more robust and structured framework for sustainability due diligence. Additionally, the company's focus will be on implementing and formalizing this due diligence process in alignment with OECD guidelines.



## 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 and Internal Audit, Senior Vice President Investor Relations and Sustainability, Senior Director Sustainability and Director Procurement.

This Statement was approved by the Board of Directors of Sinch AB (publ) on 23 June 2026.

This Statement has been signed by Björn Zethraeus as a director of Sinch AB (publ).

Signed by:  
  
4046423359A34C2...

Björn Zethraeus  
Director of Sinch AB (publ)