



Syniverse Technologies – Modern Slavery Statement

Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Syniverse Technologies S.à r.l., and its subsidiaries (“Syniverse”) have taken in the financial year ending 31 December 2021 and will continue to take to address the risks of modern slavery and human trafficking occurring in its business and supply chains.

Syniverse is a values-driven organization, and we aspire to meet the highest professional, legal, and ethical standards.

Syniverse supports the protection of internationally proclaimed human rights, the elimination of all forms of forced and compulsory labor and the effective abolition of child labor.

Syniverse is committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

This statement sets out our approach to modern slavery. For more information on Syniverse’s approach to Environmental, Social and Governance topics, please visit: <https://www.syniverse.com/corporate-responsibility>.

Our business and risks

Syniverse’s ultimate parent company is Syniverse Technologies LLC which has its head office in Tampa, Florida and is incorporated under the laws of Delaware. As of July 31, 2022, the global group of companies had 1,524 full time equivalent employees and provide services in nearly 200 countries worldwide.

Syniverse is incorporated under the laws of Luxembourg and is the immediate parent company of Syniverse Technologies Solutions Limited, its principal UK operating entity.

Syniverse is an integral part of the mobile ecosystem and its proprietary software, protocols and orchestration capabilities power mobile experiences for almost every person and device on earth. Given the nature of the services we provide, the industry in which we operate and the professional workforce we employ, we assess the risk of modern slavery or human trafficking in our own organization to be low.

Our supply chain

Our supply chain comprises primarily services, including professional advisory services, travel services and IT services, as well as office supplies. We have reviewed our supply chain and believe the overall risk of modern slavery or human trafficking is low owing to:

- The nature of the goods and services which we procure (mostly services, mostly skilled professions).
- The locations from which we procure them (mostly in developed markets).
- Our procurement practices (for example, we agree to reasonable terms and standard payment).

While the overall level of risk is low, these criteria also enable us to identify where the risk may be higher.

Our policies on slavery and human trafficking

Our internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Due diligence processes for slavery and human trafficking

We have embedded checks for modern slavery in our routine supplier due diligence process and have raised awareness of these issues with colleagues who manage this supplier vetting process.

The due diligence process reflects the relative risk for potential suppliers and includes:

- Checks against global sanctions and enforcement databases (for example, OFAC, World Bank Debarment List) and subject to adverse media review to identify risks including human rights abuses, human trafficking, and labor violations.
- Those potential suppliers identified as medium or high risk are subject to further vetting and evaluation based on the specific supplier's circumstances. This includes higher risk and higher spend suppliers, who will be asked as part of a questionnaire about their policies and procedures in place regarding human rights, modern slavery, forced labor, child labor or human trafficking.
- A Supplier Code of Conduct and related supplier questionnaire which are being rolled out on a phased basis. As part of our Supplier Code of Conduct, Syniverse requires suppliers to fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws (including the UK Modern Slavery Act 2015) and expects suppliers to enact practices to ensure compliance with such laws.

Ongoing steps

Syniverse does not tolerate slavery, forced labor or human trafficking in any form and expects its suppliers to adhere to the same standards. We:

- Plan to embed in our risk assessment of suppliers an evaluation of modern slavery based on criteria such as the country of operation and government response, as assessed by the Global Slavery Index.
- Intend to update our standard contracts for use at a global firm level with all supply chain partners to confirm their compliance with the Modern Slavery Act 2015 as well as other applicable global laws relating to modern slavery; to warrant that they have not been convicted of any offences relating to slavery or human trafficking; and to ensure they implement due diligence procedures in their own supply chains.
- Published our Human Rights Statement within our ESG Report which expresses our commitment to human rights and our commitment against contributing to, participating in, or enabling the use of child, forced, or exploited labor or forced or exploitative conditions and against assisting our clients in doing so in any way.
- Support our human rights-related policies with regular awareness and training. Every Syniverse employee has the right to raise concerns about values, ethics and professional conduct without fear of retribution. In addition to clearly defined internal channels, we have a global hotline that allows colleagues to raise concerns relating to potential violations of laws and the firm's policies, professional standards, and values in a confidential manner and, where legally permissible, anonymously.

Syniverse remains committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This slavery and human trafficking statement has been approved by the board of Syniverse Technologies S.à r.l and is published pursuant to S.54 of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2021.

Andrew M. Davies, CEO