

Modern Slavery Statement

November 2021

1. Introduction

Melissa Data Corporation (Melissa) is committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking, or any other form of exploitation, as contemplated by the UK's Modern Slavery Act 2015, in any part of the organisation.

As a business, we recognise we have a key role to play in preventing all types of modern slavery—not only within our company, but also in our supply chains—through the promotion of ethical business practices and policies.

2. Organisation Structure and Supply Chains

Since 1985, Melissa has specialised in global intelligence solutions to help organisations unlock accurate data for a more compelling customer view. More than 20,000 clients worldwide rely on Melissa for a full spectrum of data quality and ID verification software, including data matching, validation, and enhancement services. This enables our customers to gain critical insight and drive meaningful customer relationships.

Melissa is a privately owned, US company with its headquarters in Rancho Santa Margarita, California. Melissa has four additional offices in the United States, which are located in North Carolina, Oregon, Washington, and Massachusetts. Two additional North American offices are located in Canada and Mexico. Melissa's European offices are located in the United Kingdom, Germany, and Italy. Finally, four offices are located in the Asia Pacific region: Australia, India, Philippines, and Singapore.

Melissa's key supply chains are comprised of:

- **Data Suppliers** – including Data Products and Services from third parties, delivered via API or flat file.
- **Technology Service Providers** – including Managed Hosting Services, Cloud Solutions, Software Licenses, and Hardware Supply.
- **People Services** – including Recruitment Agencies, People Management Systems, Professional Service Advisors and Benefits Providers. Facilities Management – including building maintenance, refreshment providers, and office consumable suppliers.

3. Policies in Relation to Slavery and Human Trafficking

We recruit employees and suppliers in a lawful and professional manner, using effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our business or supply chains. As part of this approach, we use our market leading ID and address verification products and services for additional checks.

We are committed to creating and ensuring an open and transparent working environment for our staff so they can express workplace and supply chain concerns without any risk of retaliation. Melissa's professional and ethical philosophies are demonstrated in our company's Code of Business Conduct and Ethics; Whistleblower Policy; and Diversity, Equity, and Inclusion Policy.

Code of Conduct

Upon hire, all Melissa employees are required to review and acknowledge the company's Code of Business Conduct and Ethics, which sets forth four fundamental obligations:

1. To become familiar with, and conduct business in compliance with, applicable laws, rules and regulations and Company policies;
2. To treat all other persons in an honest and fair manner;
3. To avoid situations in which the employee's personal interests are, or may appear to be, in conflict with Melissa's interests; and
4. To safeguard and use properly all Company information, assets, and resources, as well as those of our customers and business partners.

Should any employee become aware of suspected misconduct or illegal activities, they are expected to report such matters. Melissa prohibits any director, officer, or employee from retaliating or taking adverse action against anyone for raising suspected conduct violations or cooperating with any investigation of such allegations.

Whistleblower Policy

Melissa encourages employees to report to management an activity that they consider to be illegal or dishonest. Examples of illegal or dishonest activities include violations of federal, state, or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. Supply chain concerns, including issues relating to human trafficking and modern slavery, may also be the subject of a whistleblower's report. If an employee has concern or knowledge of illegal, dishonest, or fraudulent activity, the employee is expected to contact a manager or the Human Resources Department.

Whistleblower protections are provided to employees in two important areas: to protect the whistleblower's confidentiality and to guard against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is the subject of retaliation must contact the Human Resources Department immediately.

Diversity, Equity, and Inclusion Policy

Melissa is committed to fostering, cultivating and preserving a culture of diversity, equity, and inclusion. We embrace and encourage our employees' differences in age, colour, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

Melissa's diversity initiatives are applicable to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity.

All Melissa employees have a responsibility to treat others with dignity and respect at all times. Any employee found to have exhibited any inappropriate conduct or behaviour against others may be subject to disciplinary action.

4. Due Diligence Processes

Melissa will not support or deal with any business knowingly involved in slavery or human trafficking.

As part of the due diligence processes built into Melissa's Vendor Management Policy, we review many aspects of each of our vendors prior to establishing a contract. This due diligence review includes the vendor's business reputation, finances, corporate history, insurance, and compliance with applicable laws. To the extent necessary, we collect background checks of the company principals, audited financial records, and compliance certifications.

Further, we make sure all suppliers with over £36 million in annual turnover that carry out all or part of their business in the UK have a publicly available Modern Slavery Statement that is updated annually.

5. Employee Education on Modern Slavery and Trafficking

Our Modern Slavery Statement is available at all times to employees through Melissa's intranet, Sharepoint, and through our company Human Resource Information System (HRIS), ADP, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and business. New employees will be required to review and confirm their understanding of our Modern Slavery Statement as part of the onboarding process.