

UK Modern Slavery Statement

Twilio UK Limited Fiscal Year 2022





This statement is made by Twilio UK Limited in accordance with its obligations under s. 54 of the UK Modern Slavery Act of 2015 (the “Modern Slavery Act”). It sets out the steps taken by Twilio UK Limited during the financial year ended 31 December 2022 to prevent modern slavery and human trafficking in its business and supply chain. For the purposes of this statement, any reference to “Twilio” is a reference to each and every company within the Twilio group of companies (including Twilio UK Limited), as we uphold the values set out in this statement, regardless of geographic location.

Twilio is a software and communications company that offers a leading customer engagement platform comprised of flexible software and communications solutions. Twilio’s platform allows businesses to deliver seamless, trusted and engaging customer experiences at scale.

We also believe we can create greater social good through better communications. Through Twilio.org, which is a part of Twilio Inc., we donate and discount our products to non-profit organizations, who use our products to engage their audience, expand their reach and focus on making a meaningful change in the world. For example, non-profits have used our products to create a 24/7 SMS hotline to fight human trafficking, use programmable SMS to proactively reach out in offer of support to potential victims of human trafficking posted in online ads, and develop AI-powered SMS bots to disrupt child sex trafficking by preventing buyers from connecting with victims.

Twilio is committed to upholding the highest ethical standards and to complying with all applicable laws and regulations (including the Modern Slavery Act). We are also committed to ensuring transparency in how we conduct our business in order to prevent modern slavery and forced labor in our supply chain.

Twilio's Organisation Structure and Supply Chain

Twilio Inc. (the group parent company) is headquartered in the United States and has subsidiaries in many countries throughout the world. In the UK, Twilio Inc. has one subsidiary, Twilio UK Limited. Twilio UK Limited provides sales and marketing and research and development services to Twilio group companies.

Twilio's global procurement team is based in our headquarters in the United States. The majority of our contractors, partners, resellers, vendors and other suppliers are based in the United States, and most of our procurement is from U.S.- based contractors, partners, resellers, vendors and other suppliers. Twilio's global procurement team sources suppliers for all Twilio group entities, including Twilio UK Limited.

The Twilio Values

Twilio has developed [our four core values](#) that set out how we act as a business, and what we expect of all of our employees, whether they are dealing with other members of the business, customers or suppliers. In order for an organisation to help prevent modern slavery and human trafficking, Twilio believes that its personnel must follow a set of principles.

One of our core values is "We are Positrons." Among the principles underpinning this core value are: "No Shenanigans," and the commitment to always dealing in an honest, direct and transparent way; and "Empower Others," and the commitment to unleashing human potential in others as the key to our success. To further support Twilio's efforts to encourage these principles in our business practices, all employees are required to comply with all applicable laws, including the Modern Slavery Act. By being honest and transparent about our supply chain and empowering our employees with mechanisms to enforce our values (e.g., Twilio's online ethics and whistleblower reporting option or hotline number), Twilio's employees are well-positioned to help fight human trafficking. We have strived to act in accordance with these values throughout the last financial year and will continue to do so in the future.



The Twilio Compliance Policies

Twilio's "[Code of Business Conduct and Ethics](#)" (the "**Code of Conduct**"), which requires, among other things, that our directors, officers and employees must not (nor instruct others to) engage in any unlawful activity in conducting the company's business or in performing their day-to-day company duties. This Code of Conduct has been in force during the last financial year and applies to all Twilio group companies, including Twilio UK Limited and its personnel.

All of Twilio UK Limited's directors, officers and employees are supplied with a copy of the Code of Conduct and receive training on the Code of Conduct. If a Twilio UK Limited employee becomes aware of an actual or imminent breach of the Code of Conduct, they are required to escalate the issue.

In addition, Twilio has adopted and implemented a "[Supplier Code of Conduct](#)" (the "Supplier Code"). In relevant part, the Supplier Code sets out Twilio's expectations for its business partners in the areas of labor practices and business integrity. The Supplier Code specifically states that we expect suppliers to adhere to all applicable anti-modern slavery and human trafficking laws, including the Modern Slavery Act. To ensure that members of our supply chain comply with our values, including our zero tolerance for slavery and human trafficking issues in our supply chain, whenever possible we enter into agreements with our contractors, partners, vendors and other suppliers. As part of this process, we expect all such third parties to comply with our Supplier Code as well as all applicable laws and regulations, and depending on the nature of the transaction, the agreement specifically includes the Supplier Code.



Twilio's Modern Slavery Risks, and the Steps Taken to Address Those Risks

Twilio UK Limited considers its modern slavery risk to be low because of the sector in which it operates, the nature of its supply chains, and the values, policies and the Code of Business Conduct and Ethics which its employees, directors and officers are required to adhere to. Twilio does not have intricate supply chains, multiple contractor or subcontractor levels, or vendor relationships with large manufacturing businesses where modern slavery has been found to be an issue.

However, to the extent that a potential incident involving or relating to modern slavery or human trafficking were to arise within Twilio's business or supply chain, we would investigate and deal with that incident in accordance with our Code of Business Conduct and Ethics.

This statement was approved by the Board of Directors of Twilio UK Limited on 31 May 2024.

Juliana Chen

Juliana Chen
Director, Twilio UK Limited

