



## **TWITTER UK LTD.**

### **MODERN ANTI-SLAVERY STATEMENT**

*(Financial Year Ended December 31, 2020)*

Pursuant to Section 54 of the UK Modern Slavery Act 2015, Twitter UK Ltd. (TUK) describes the measures taken to address human trafficking and slavery. Twitter is committed to promoting ethical business practices and policies that protect from such abuse and exploitation.

#### **OUR BUSINESS**

Twitter is the best and fastest place to see what is happening and what people are talking about all around the world. Twitter is where, every day, instances of breaking news, entertainment, sports, politics, big events and everyday interests unfold.

Twitter, Inc., our ultimate parent company, operates Twitter's primary service, which can be accessed on a variety of mobile devices, at [Twitter.com](https://twitter.com) and via SMS.

Twitter UK's main activities consist of advertising sales and product development.

#### **OUR CODES & POLICIES**

Twitter has a number of codes and policies which apply to Twitter UK's business and address how we conduct our business in a manner that is ethical and in compliance with applicable laws and regulations.

These include:

- Twitter's [Code of Business Conduct & Ethics](#) (the **Code**). The Code sets out our core values and expectations of employee conduct; including acting fairly and honestly, never through illegal or unethical business practices. Each employee, officer and director of Twitter must never take unfair advantage of anyone through manipulation or any other unfair dealing practices.
- As reflected in our [Inclusion and Diversity Reports](#) (Q4 2020 report linked here) and [Global Impact 2020 report](#) we work to advance a culture of inclusion and diversity - something fundamental to our collective voice and our values. We are committed to fostering an inclusive and diverse workplace free of any coercive practices - where people can feel comfortable, be themselves, and do their best work. We are likewise committed to equal pay for equal work. As part of this commitment, every year Twitter reviews Tweep's pay following the Q1 compensation planning cycle to make sure we're living these values.
- Twitter's [Supplier Code of Conduct](#) sets out the conduct required from suppliers and specifically addresses issues of forced labour, underage workers, human trafficking and the promotion of workers rights. Twitter shares this information and asks that suppliers accept them as part of its onboarding process.
- Twitter has a Whistleblowing Policy and Ethics Helpline. Questions and concerns can be raised about our business practices and supply chain, without fear of reprisal. Doing business the right way is everyone's responsibility at Twitter. This includes prohibiting any form of modern slavery / coercive working conditions. We are committed to ensuring that all of our interactions at Twitter, as well as with our customers, business partners and suppliers are conducted in an ethical and respectful manner and in compliance with our Code, Twitter policies, and applicable law.

Twitter encourages speaking up to report concerns via the Ethics Helpline or any of our reporting avenues, via frequent training, policy reminders, internal communications and training. Twitter prohibits retaliation against any person who, in good faith, reports a suspected violation, seeks guidance on an ethics or compliance concern or otherwise assists in an investigation or proceeding regarding a suspected violation. All reported violations are taken seriously. If a modern slavery concern is raised, Twitter Compliance will coordinate with appropriate stakeholders to investigate and address the issue.

- Twitter's global [Adult Sexual Content Policy](#) prohibits paid advertising for prostitution /

escort / mail order bride services. We also reject any dating advertisers whose websites indicate that money, goods or services are exchanged in return for a date and dating advertisers which we believe to be fake or misleading. In support of this, our [Illegal Products and Services Policy](#) prohibits the advertising or promotion of illegal services or activities. Our tools and communication channels help our users and others report illegal or abusive content in our services.

## **SUPPLIERS & OUR DUE DILIGENCE**

Twitter UK deals with suppliers based largely in the UK and the rest of Europe, although we may engage suppliers in other jurisdictions.

Supplier relationships are managed through our internal Sourcing Department. As part of our initiative to identify and mitigate risk, we vet all our new suppliers against global sanctions and other watch lists.

Our supplier agreements contain contractual provisions that require suppliers to adhere to and respect all applicable laws and regulations. Any violation of the terms of our Supplier Code could lead to the termination of the business relationship. Our dedicated Sourcing, Legal and Compliance teams work closely together in collaboration with our wider business to review and improve our supplier compliance oversight processes on an ongoing basis. Building on the development of anti-modern slavery compliance language for our UK supplier agreement template in 2019; legal, compliance and sourcing collaborated to identify appropriate TUK suppliers for incorporation of this language throughout 2020.

## **RISK ASSESSMENT & EFFECTIVENESS**

Sourcing and Compliance teams continue to annually review the Twitter UK supplier payment list to assess potential modern slavery risks areas of our business and supply chain.

Our Real Estate and Workplace team specifically review the Modern Slavery and Human Trafficking Policies of our Twitter UK soft services facilities management service providers to ensure they are at a minimum aligned with our own core codes, policies and principles.

If a modern slavery question or concern were to arise, our dedicated Compliance team would oversee an independent investigation and address the issue with appropriate stakeholders.

In 2020, we continued our internal cross functional check-in process and review, including for the purpose of assessing relevant updates for our report. We also enhanced our internal intelligence sharing exercise between Compliance and Legal and conducted another report content benchmarking exercise via internal and external engagement in support of our overall review cycle. Our Human Rights team, situated within Legal, also considers the risk of human trafficking as part of impact assessments focused in expanding our operations in key markets.

### TRAINING & AWARENESS

To ensure a high level of understanding of Twitter's core values and legal obligations, we provide regular live and system based training to all our staff on our above codes and policies.

During 2020, this included Compliance team led live training and awareness sharing for EMEA Source to Pay team regarding key UK laws, that included the Modern Slavery Act 2015, how modern slavery risks arise in a business and TUK's annual statement. Additionally, Compliance and Legal enhanced its collaborative approach to tracking and awareness sharing on emerging best practices, guidance and external advisory offerings available to support our *#OneTeam* approach.

The Twitter UK Ltd Board of Directors has approved this Statement.

A handwritten signature in black ink, appearing to read 'Laurence O'Brien', with a large, sweeping flourish extending to the right.

**Laurence O'Brien, Director, Twitter UK Ltd**

Twitter UK financial year end: 31 December 2020