

Modern Slavery Act Disclosure Statement

*Statement for financial year ending March 31,
2024*



Disclosure Statement

This Statement is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018, and constitutes our, Mimecast Limited (and its affiliates) (collectively, “Mimecast”), Modern Slavery Act Disclosure Statement for Mimecast’s fiscal year ending March 31, 2024.

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, and for the purposes of this Statement, the term “modern slavery” is used to encompass slavery, forced and compulsory labour and human trafficking.

The steps Mimecast has taken to address Modern Slavery in our global operations is listed below. We are committed to the ongoing evaluation of the steps taken, assessing their effectiveness, and identifying any additional measures required. We intend to regularly assess the results of our processes to ensure that modern slavery risks are addressed in a manner consistent with the applicable law. Based on our current actions to address these risks, we are not aware of any modern slavery in our operations or those of our Suppliers.

Organisation’s Structure

Mimecast is committed to responsible sourcing, ethical and lawful business relationships, and the eradication of modern slavery in our supply chain.

Mimecast is a SaaS-based, unified, enterprise email management provider. We operate a global business with over 2000 employees in entities/branches located in the United Kingdom, the United States, South Africa, Canada, the Netherlands, Germany, France, Poland, the United Arab Emirates, Israel, Singapore, and Australia. Mimecast has an annual global turnover in excess of £36m.

PROCESS OF CONSULTATION WITH OWNED ENTITIES

In compiling this Modern Slavery Statement, Mimecast’s wholly owned entities have been consulted and their feedback solicited.

Risk Assessments

We assess, evaluate, and monitor the risk of modern slavery in our supply chain. We take steps to mitigate any risks identified, which include but are not limited to:

- Consideration of high-risk countries where modern slavery is more prevalent;
- A third party risk management process, which includes restricted party screening; and
- Cross-departmental review and approval of new suppliers, vendors, and service providers with whom Mimecast has contractual relationships (collectively “Suppliers”).

Mimecast is not aware of any situations in which modern slavery exists within its own operations, or in the operations of its Suppliers. As such, Mimecast believes the risk of modern slavery is low in its operations and those of its Suppliers. Nonetheless, as part of its due diligence, Mimecast takes the following actions to mitigate any potential modern slavery risks.

Supplier Contracts

Mimecast takes steps in its Supplier contracts to require that services to be performed are done in accordance with relevant laws, regulations and guidelines, and any locally applicable anti-slavery and human trafficking laws, statutes and regulations.

Suppliers undergo a risk assessment at inception and periodic reviews for evaluation of security and compliance implications as necessary. The due diligence undertaken in respect of Suppliers is adapted dependent on the type of Supplier and any areas of risk identified. As a provider of cloud-based services, our supply chains are in any event small.

Code of Business Conduct and Ethics

Mimecast maintains a Code of Business Conduct and Ethics (“the Code”) which articulates fair dealing with customers and Suppliers. These standards are a part of the foundation for Mimecast’s long-term success.

All Mimecast directors, officers, employees, consultants and contractors are required to comply with the Code, and must deal ethically and lawfully with customers, suppliers, competitors and employees in all business dealings on Mimecast’s behalf.

In the event of a reported violation of its Code, Mimecast will evaluate the matter(s) set forth in such report and, if appropriate, commence and conduct an appropriate investigation. Any violation of the Code and the actions taken with respect to such violations shall be reported to the Board of Directors or a committee thereof.

Any Supplier, employee, consultant or contractor who condones or permits noncompliance or a violation of the Code may be subject to negative consequences, up to and including termination of the relationship.

Audits

Mimecast may rely on audit provisions in its Supplier contracts, where applicable, to permit it to verify its Suppliers compliance with contractual representations.

Mimecast may conduct such audits through its own personnel or through a third party independent auditor.

Processes

As part of executive risk management, Mimecast has identified the need to align privacy and security compliance with applicable regulations.

Mimecast is committed to strict adherence to all export laws and regulations relating to international dealings in the countries in which it conducts business.

Mimecast communicates its expectations of fair, ethical, and lawful business relationships to its Suppliers both during the procurement process and through our contracts with Suppliers.

Mimecast has established processes to encourage seeking guidance, asking questions and reporting concerns, including Mimecast's Whistleblower Hotline, which is open to both internal and external stakeholders. These processes ensure the protection of the confidentiality of any individual making a report subject to applicable law, rule or regulation or to any applicable legal proceedings. They also ensure that the reporting individual will not be subject to retaliation for any reports made in good faith.

Training

To ensure a high-level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we provide training to relevant members of staff.

Training needs will be evaluated by the Legal and Finance Departments and Mimecast's Compliance Officer and may be revised as necessary.

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Approval, Communication and Review

This Modern Slavery Act Disclosure Statement is subject to annual review and approval by the Mimecast Board of Directors, or sooner in response to significant changes in Mimecast's business practices or applicable law and regulations. The Modern Slavery Statement for financial year ending March 31, 2024 is approved by Mimecast's Board of Directors as of April 1, 2024.