Iris Holdings L.P.
UK Modern Slavery Act Transparency Statement

This Statement is published in accordance with section 54(1) of the United Kingdom Modern Slavery Act 2015 (the “Act”) on behalf of Iris Holdings L.P. and its subsidiaries, including but not limited to the operating entities listed on Exhibit A (together the “CM Group” or “we”) for the 2022-23 financial year (July 1, 2022- June 30, 2023).

CM Group was created to offer web-based marketing solutions to marketers, and has offices globally, including but not limited to, in the United Kingdom, Belgium, United States, Australia, New Zealand, and Uruguay.

CM Group is committed to acting responsibly, ethically and with integrity in all aspects of our business. This includes, in particular, ensuring that CM Group does not act in a way that might give rise to the furtherance of servitude or modern slavery.

We have considered the risks of modern slavery arising out of our business activities and have concluded that this risk is low based on the nature of our business and our supply chain.

CM Group’s supply chains comprise service providers of other web based technologies which are incorporated into our core products. Other aspects of CM Group’s supply chains comprise professional services, information technology, office suppliers, facilities maintenance, catering and hospitality services.

CM Group will engage with its suppliers in an effort to eliminate modern slavery in our business and supply chains and promote the positive behaviours outlined in the Act. CM Group already has a variety of policies and procedures designed to promote its commitment to corporate governance and ethical behaviour included in CM Group employee handbooks. Further, CM Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

We will consider appropriate targeted training on modern slavery for certain employees where necessary. This will enable us to better understand our role in mitigating the risks of modern slavery. We will also update our existing policies to specifically address the risks of modern slavery.

CM Group’s General Counsel takes responsibility for overseeing our modern slavery efforts. This Statement will be reviewed annually and updated as necessary.

CM Group financial year end is June 30, 2022 and the leadership team and Board of Directors approved this Statement on June 30, 2022 for the CM Group Fiscal Year beginning on July 1, 2022 through June 30, 2023.

This Statement has been authorised by:

Signature:  

Name: Wellford Dillard

Position: Board Member

Date: June 30, 2022
EXHIBIT A
CM GROUP SUBSIDIARIES

CM

UK Entities:
1. Campaign Monitor Holdings (UK) Limited
2. CM 2019 (UK) Limited
3. Campaign Monitor (UK) Limited
4. Campaign Monitor Europe UK Ltd
5. Selligent Holdings Limited (company number 09672696)
6. Selligent Intermediate Holdings Limited (company number 11628026)
7. Selligent Group Limited (company number 11628138)
8. Selligent Ltd (company number 06398867)
9. PublicBeta Limited
10. Sailthru UK Limited
11. Vuture Group Limited
12. Vuture Limited

Operating Entities:
1. Campaign Monitor Pty Ltd.
2. Sailthru NZ Limited
3. Selligent, Inc. (registered number 3742821)
4. LiveClicker, Inc.
5. Emma, Inc.
6. Sailthru, Inc.
7. Vuture US, Inc.

Cheetah

UK Entities:
1. Cheetah Holdings Limited
2. Marketing Technology Partners UK Limited
3. Wayin Limited

Operating Entities:
1. Cheetah Marketing Technology Pty Ltd
2. Cheetah Digital, Inc.
3. Wayin Inc.
4. Stellar Loyalty, Inc.