



**UK Modern Slavery and Human Trafficking Statement**  
**Twilio UK Limited and SendGrid UK Limited**  
**Fiscal Year 2019**

This statement is made by Twilio UK Limited and SendGrid UK Limited (collectively, the “**Twilio UK Entities**” and each a “**Twilio UK Entity**”) in accordance with its obligations under s. 54 Modern Slavery Act 2015 (the “**Modern Slavery Act**”). It sets out the steps taken by the Twilio UK Entities during the financial year ended 31 December 2018 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 the Twilio UK Entities), as we uphold the values set out in this statement, regardless of geographic location.

We are committed to upholding the highest ethical standards, and complying with all relevant laws and regulations (including the Modern Slavery Act). We are also committed to ensuring transparency in how we conduct our business, and the prevention of modern slavery in our supply chain.

**Twilio’s Organisation Structure and its Business**

Each Twilio UK Entity is an indirect subsidiary of Twilio Inc. (the group parent company), which is headquartered in the United States in San Francisco, California, and has a presence in a number of other markets around the world. In the UK, Twilio operates via its two UK subsidiaries, Twilio UK Limited and SendGrid UK Limited.

Twilio has democratized communications channels like voice, text, chat, video and email by virtualizing the world’s communications infrastructure through APIs that are simple enough for any developer to use, yet robust enough to power the world’s most demanding applications. We believe we can create greater social good through better communications.

Through Twilio.org, which is a part of Twilio Inc. and not a separate legal entity, we donate and discount our products to non-profits, who use our products to engage their audience, expand their reach and focus on making a meaningful change in the world. For example, creating a 24/7 SMS hotline to fight human trafficking, using programmable SMS to proactively reach out in offer of support to potential victims of human trafficking posted in online ads, and developing AI-powered SMS bots to disrupt child sex trafficking by preventing buyers from connecting with victims.

**The Twilio Values**

Across the Twilio group [our ten core values](#) 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 human trafficking, its people need to follow a set of principles that encourages behaviour that aligns with such an initiative.

One of our core values is to always act in an honest, direct and transparent way (“No Shenanigans”) and to unleash the power of human potential both inside and outside of the company (“Empower Others”), and we hope to demonstrate these values in all aspects of our business. To further support Twilio’s efforts to encourage these principles in all of its business practices, each of our employees is expected 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.

## **The Twilio Policies in Relation to Slavery and Human Trafficking**

Each Twilio UK Entity adheres to the Twilio Inc. "[Code of Business Conduct and Ethics](#)" (the "**Code**"), 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 has been in force during the last financial year and applies to all of the companies within the Twilio group, including the Twilio UK Entities. We have continued to act, and require each of our directors, officers and employees to act in accordance with this Code throughout the last financial year.

In addition, directors, officers and employees are obliged not only to deal with our customers, suppliers, competitors and other employees lawfully, but also ethically in all business dealings on the Company's behalf. This includes acting in compliance with the Modern Slavery Act.

All of the Twilio UK Entities' directors, officers and employees are supplied with a copy of the Code. If an employee becomes aware of an actual or imminent breach of the Code, they are obliged to escalate the issue.

With respect to the conduct of our suppliers, we expect our suppliers to comply with applicable laws, including the Modern Slavery Act. Should Twilio become aware of any policy violations or issues related to slavery or human trafficking, we will consult with our legal team to ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with any supplier conducting its business in such a manner.

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

Each Twilio UK Entity considers its modern slavery risk to be generally low, particularly 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. However, to the extent that a risk of modern slavery, or a potential modern slavery incident was identified within our 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 and SendGrid UK Limited on 25 July 2019.



Christopher Douglas Andrews  
Director, Twilio UK Limited



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Director, SendGrid UK Limited