

Modern Slavery Act Transparency Statement

Statement from Senior Management

ClickDimensions LLC ("ClickDimensions") is committed to ensuring that our business and supply chain reflects our values and respect for human rights. We are committed to improving our practices to combat modern slavery and human trafficking.

Organizational structure, our business, and our supply chains

ClickDimensions provides a Software-as-a-Service cloud- based marketing automation platform natively integrated with Dynamics 365. Our platform includes tools for email marketing, campaign automation, web intelligence, surveys, web forms, landing pages, and social marketing. We provide our services to customers primarily in the United States, the European Union, the United Kingdom, and Australia.

The business operating model is as follows:

ClickDimensions is a limited liability company organized under the laws of Georgia, USA, with its headquarters located at Atlanta, Georgia. We have offices in Ireland, Israel, the Netherlands and New Zealand. We utilize full time employees and contractors to develop and maintain our software application. All of our personnel are subject to background checks prior to beginning work for us.

We recognize that slavery and human trafficking are prevalent in the world today and we have processes in place to ensure that slavery and human trafficking are not taking place in our supply chain by confirming that our service providers have appropriate policies and procedures in place. Our personnel are required to undergo annual training which, among other things, emphasizes our position in this area.

We are in the process of implementing a hotline so that our personnel may report any concerns they have without fear of retaliation. We will update this statement when the hotline is 'live'.

Our process gives us confidence that we are at a very low risk for exposure to slavery, unlawful child labor or human trafficking within our day to day operations.

Policies in relation to slavery and human trafficking

The following policies support ClickDimensions' commitment to combating modern slavery and human trafficking:

1.1 Third-Party Management Program

ClickDimensions is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. ClickDimensions' relationships with suppliers are based on ethical, lawful, socially responsible, fair practices. We expect our suppliers to obey the laws and regulations that require them to treat workers fairly, provide a safe and healthy work environment.

1.2 Human Resources Management Program

ClickDimensions' recruitment policies are socially fair and legally compliant. We carry out right to work checks on all of our employees. All candidates are required to evidence their legal right to work. We are alert to potential modern slavery issues, such as a delay in providing a passport, and we are very committed to ensuring that our recruitment processes are free of prejudice and involuntary labor.

1.3 ClickDimensions Employee Reporting (All GRCS policies)

ClickDimensions is in the process of contracting with a third-party to provide and manage an 'Anonymous Ethics Hotline' Whistle blowing - ClickDimensions provides a whistleblowing process for our employees to raise any concerns they may have in relation to compliance with our legal obligations, including in relation to modern slavery and human trafficking, and to ensure that there is adequate protection for employees who make protected disclosures or "blow the whistle".

Due Diligence

ClickDimensions encourages its suppliers to comply with the UK Modern Slavery Act.

Assessing and managing risk

ClickDimensions regularly takes steps to identify the area of its business and its supply chains that are most at risk in relation to modern slavery and human trafficking by conducting ongoing risk assessments.

Training

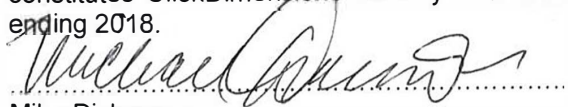
To maintain internal accountability, all relevant personnel are trained to recognize environment, health, safety, and labor/worker concerns, including issues relating to slavery, human trafficking and forced labor, and to report and investigate all suspicions of improper conduct at all suppliers globally. For example, we provide annual training on Information Security Awareness and our Employee Handbook contains provisions on ethics and appropriate business conduct.

Effectiveness in combating slavery and human trafficking

- 100% of ClickDimensions employees have been verified for their immigration status and right-to-work in their territory.
- All new employees receive training on our procedures in relation to identifying and avoiding modern slavery.

We are implementing a process to require our suppliers to acknowledge compliance with our Code of Conduct to the extent applicable to the services they provide. The Code of Conduct includes access to our hotline for reporting issues or seeking guidance on these and other topics. As of the date of this statement, we have not received any complaints for any matters related to modern slavery.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes ClickDimensions' slavery and human trafficking statement for the financial year ending 2018.



Mike Dickerson
Chief Executive Officer