

## **ANTI-SLAVERY STATEMENT**

### **Introduction**

This statement is made on behalf of Return Path Inc. and its subsidiary Return Path UK Limited (collectively, “Return Path”) pursuant to the Modern Slavery Act 2015. At Return Path, we believe that people come first and, and so we naturally have no tolerance for any kind of slavery, servitude and forced or compulsory labour within any part of our business.

### **Our Business**

Return Path is the expert in email deliverability. Every day, our customers trust our data and insights to help them optimize their email marketing. Partnered with best-in-class email service providers, we help marketers take their email programs to the next level by driving more response and increasing revenue. Through the Return Path Data Exchange, we’ve brought together the world’s most comprehensive source of data from the email ecosystem. We partner with more than 70 providers of mailbox and security solutions, covering 2.5 billion inboxes—approximately 70 percent of the worldwide total. Also feeding into this data platform is our consumer network of more than 2 million consumers, delivering unparalleled insight into user behavior, brand affinity, and consumer preferences.

Return Path’s principal offices are located in New, New York (USA) and we are present across the globe, including the UK where we have employees working out of our London office.

### **Our Core Values**

At Return Path, we believe that people come first and we have a strong commitment to treating everyone, whether working at or working with Return Path with respect. We further believe that every company has a responsibility to create a safe work environment.

### **Our Employees; Our Policies**

Most of our workers are employed directly by our organization and are generally employed under standard contracts. Typically, our prospective hires are subject to an interview process and pre-employment checks to confirm their right to work within the country where they will be employed. In addition, together with their employment contract, our new hires receive a People Pact with information regarding their rights as employees such as benefits, salary, sick days, vacations, etc. Further we require across the organization compliance with all applicable laws; this includes labor and employment laws.

We also have implemented a “Give Feedback” system allowing our employees, at their option, to anonymously or confidentially report inappropriate behavior including harassment, discrimination or violation of any policies, or to give feedback.

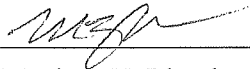
## **Management of Third Parties**

Due to the high tech nature of our business, the risk of slavery or human trafficking occurring either within the organization or our supply chain is considered very low. Yet, we have no tolerance for it and we pursue our efforts to improve our procedures in order to ensure no modern slavery of any sort is taking place in our supply chain. As part of this, we require all our suppliers, contractors and partners to comply with all applicable laws.

## **Our Further Steps**

We are continuously improving our process and will be working on raising awareness amongst our organization, our partners, and our supply chain in general. We intend to provide training and other comprehensive resources to our employees to make sure they are aware of the Modern Slavery Act and know what to do when witnessing any slavery or human trafficking.

This statement was approved by our board of directors and constitutes our slavery and human trafficking statement for the financial year ending December 31, 2017.



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Matthew Y. Blumberg  
Director and Chief Executive Officer  
Return Path, Inc.