

1. Introduction

Modern slavery is a crime and a violation of fundamental human rights, regardless of the form it takes, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Contrast is committed to acting ethically and with integrity in all its business dealings and relationships and implementing and enforcing effective systems and controls to ensure that our supply chain is free from modern slavery.

Contrast Security, Inc. is an application security software company headquartered in Pleasanton, California, United States and with subsidiaries in the United Kingdom and Japan. As of 2024, Contrast employs around 250 full time employees. Contrast uses third-party service providers for cloud computing and other purposes, as well as contractors based in such locations as India, Mexico, New Zealand and the Philippines.

2. Risk Assessment

In general, Contrast considers the potential risk of modern slavery and human trafficking in our supply chain to be low. As a software-as-a-service (SaaS) company, we do not deal directly with physical materials that are of high risk, nor does our business model require the use of unskilled labor and as such we are unlikely to encounter child labour or human trafficking in our immediate supply chain.

Where we do see some, albeit low, potential risk, is in our hardware supply chains, and in our use of contract workers in countries that have a relatively high incidence of forced labour, such as India and the Philippines. Therefore, our due diligence policies and processes focus on these key parts of our supply chain.

3. Policies and Procedures

Recruitment and employment practices

Contrast ensures that all of its employees are legally eligible to work in their country of hire and that all employees are provided with the relevant legally required notices and documents regarding their statutory rights. All employees are paid at least the living wage for their area of residence, and Contrast thoroughly vets its recruitment firms before engaging a third party to source candidates for employment.

Supplier due diligence

Contrast will assess all hardware providers and contractor firms for evidence of forced labour and modern slavery within their own businesses and general supply chain. Where evidence is found, the supplier will be referred to senior management who will determine the appropriate follow-up action.

Training and awareness-raising for employees

Once appropriate training has been identified, all approved requesters (Contrast employees who have the authority to submit procurement requests for the onboarding of new contractors and vendors) and employees at Director level and above, will be required to undertake annual training in recognizing forced

labour and modern slavery and how to report it within Contrast.

4. Due Diligence

In 2025, Contrast will start assessing each of its vendors to identify whether they provide us with: a) hardware; or (b) human resources such as contractor hours. Such vendors will be asked to provide evidence that they are not engaging in forced labour practices and may be subject to audit or termination of contract, depending on the outcome. New vendors in these categories will not be onboarded into Contrast's supply chain until and unless they can provide evidence to support that they are compliant with the Modern Slavery Act of 2015.

Additionally, for vendors who do not fall into either of these two categories, we will start assessing whether they have their own policies and processes to identify and remediate modern slavery in their supply chains. At this point in time we do not expect to end business relationships with these vendors if they are unable to provide evidence of suitable policies and processes, unless direct evidence of forced labour or other types of slavery are uncovered. However, we expect this to be a part of our vendor governance process in future years.

5. Monitoring and Evaluation

In 2025, we will start requesting documentation from our vendors, such as their own Modern Slavery Statement, to evidence their efforts to eliminate modern slavery and human trafficking from their supply chains. If vendors are unable to provide their own documentation, Contrast will provide them with a questionnaire to complete. Where the Compliance team finds that a vendor is unable to provide sufficient evidence that they are not engaging with forced labour, these cases will be referred to senior management who will decide whether the evidence is sufficient to terminate the business relationship.

6. Training and Awareness-Raising

Contrast is currently evaluating options for modern slavery training and intends to implement such training for all employees who are authorized to submit procurement requests (approved requesters) and employees at Director level and above.

7. Remediation

At this time, evidence of modern slavery and forced labour in our supply chain is remediated on a case by case basis; if the Vendor Governance team identifies that a vendor is engaged or complicit in modern slavery, they will refer their investigation to senior management, who will determine the appropriate next steps.

8. Reporting and Communication

Contrast maintains an ethics/whistleblower hotline (+1 650-567-4734) where employees and other stakeholders can report suspected or identified modern slavery concerns. Contrast also maintains an email address, compliance@contrastsecurity.com, where reports can be made, and reports can also be submitted by post to Contrast's headquarters: 6800 Koll Center Parkway, Ste. 235, Pleasanton, CA 94566 USA.

9. Continuous Improvement

Contrast is committed to continuously improving our efforts to identify and eradicate modern slavery in our supply chain. In 2025, we will introduce comprehensive assessments for our suppliers, roll out training for all employees with purchasing authority, and establish a remediation framework for instances where we have identified modern slavery in our supply chain.