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# MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2025

This statement fulfills the requirements of Section 54 of the Modern Slavery Act 2015 and covers the period 1 January 2025 to 31 December 2025 for Cyber-Ark Software (UK) Limited.

## Our Commitment

Being a sustainable leader in cybersecurity is as much about delivering the best services and solutions as it is about our people and our values that determine how we do business. We are committed to doing business with integrity, including protecting and advancing human dignity and human rights in our global business practices and throughout our supply chains, which is reflective of the UN Declaration on Human Rights.

CyberArk[1] does not tolerate or condone human trafficking, modern slavery, labor exploitation or any other human rights abuses in any part of our global organization. In any instance where such abuses are suspected, we will act swiftly to investigate and remedy the situation.

## Who We Are

CyberArk, a Palo Alto Networks company, is the global leader in identity security, trusted by organizations around the world to secure human and machine identities in the modern enterprise. CyberArk's AI-powered Identity Security Platform applies intelligent privilege controls to every identity with continuous threat prevention, detection and response across the identity lifecycle. With CyberArk, organizations can reduce operational and security risks by enabling zero trust and least privilege with complete visibility, empowering all users and identities, including workforce, IT, developers and machines, to securely access any resource, located anywhere, from everywhere.

## Our Due Diligence Processes

All business partners and critical vendors are subject to automated due diligence screening at onboarding and throughout their lifecycle. This screening is facilitated via our integrated NAVEX platform, which explicitly evaluates third-party risk profiles for human rights and modern slavery vulnerabilities. Streamlined and centralized within our internal tracking databases, this framework routes elevated risk triggers to our Compliance team for in-depth evaluation.

As our corporate integration continues, these risk assessment mechanisms and screening protocols are being systematically aligned with Palo Alto Networks' global third-party risk management architecture.

## Our Risk Assessment and Management

In general, CyberArk's human trafficking and modern slavery risks are relatively low. This is because our core business areas –the development, sale and support of software and cloud-based cybersecurity solutions – do not rely on low-wage labor or target vulnerable populations such as children or immigrants. We do not engage in any manufacturing or construction activities.

Additionally, CyberArk's vendors primarily include reputable technology vendors, technology service providers, professional service providers, and similar entities. At our offices, we purchase goods and services such as food, cleaning supplies, and marketing products from well-established local businesses. Similarly, our primary business partners are well-established distributors, resellers and technology partners, who typically do not rely on vulnerable populations or engage in manufacturing activities where human trafficking and modern slavery are most likely to occur.

[1] CyberArk Software Ltd. together with its global subsidiaries including Cyber-Ark Software (UK) Limited (CyberArk's United Kingdom incorporated trading entity for sales activities within the EMEA region), are referred to collectively in this statement as "CyberArk."

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Nevertheless, we recognize that human rights abuses can occur within any organization and its supply chain. With that in mind, we have worked to implement stronger policies and controls across our business and operations and supply chain.

## Our Key Controls

We have continued maintaining controls across our business, including the following:

- **Strong Tone from the Top**: A demonstrated commitment from our Board and Management on conducting business with integrity.
- **Training and Awareness Programs**: We are continuously enhancing our training initiatives to ensure they are practical, cohesive, and tailored to meet organizational needs. These efforts focus on streamlining requirements and aligning training with compliance and operational objectives, thereby improving effectiveness and accessibility.
- **Code of Conduct:** Our Code of Conduct is designed to align with our values and practically address the compliance risks most relevant to our operations. It serves as the foundation for managing compliance and ethics risks at CyberArk, guiding our actions and supporting sound decision making, even in challenging situations.
- **Policies**: Our policies unequivocally denounce human trafficking and modern slavery and set forth a commitment to combatting such abuses. Our policies are reviewed annually.
- **Program Management**:
  - Our Compliance team is tasked with managing, overseeing and optimizing the in-house compliance program
  - Our Internal Audit team provides third line of defense audit support
  - Our global procurement function oversees procurement activities across our business operations and vets vendors in the supply chain
- **Reporting Channels**: Our publicly available reporting hotline allows for anonymous reporting of any suspected wrongdoing. We have raised awareness of our existing reporting channels during company-wide all-hands sessions and targeted training for high-risk teams and regions, including our confidential Speak Up hotline, which migrated to **Palo Alto Networks' Ethics Hotline** post acquisition. The Ethics Hotline remains available to our employees, business partners and other third parties.
- **Due Diligence Program:** We are screening our business partners and vendors at onboarding and throughout our engagement to enhance compliance with legal obligations and ethical values, monitoring for risks related to modern slavery or unethical labor practices.
- **Contractual Controls & Consequences:**
  - A contractual commitment by our business partners to comply with our Vendor and Business Partner Code of Conduct, or for legacy agreements, a requirement to respect applicable laws
  - Potential termination of the business relationship for a violation of the Vendor and Business Partner Code of Conduct

## Our Key Performance Indicators

We are committed to continuous improvement in our ethics and compliance program, including measures to prevent modern slavery and other human rights abuses. Given our low risk profile, our primary key performance indicators (KPIs) relate to the number of incidents and reports to our Speak Up hotline, of which none were related to human rights or modern slavery in 2025. We also conduct annual employee

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certifications of our Code of Conduct and track compliance training completion rates. We will continue to monitor whether it is appropriate to add additional KPIs to increase the robustness of our control effectiveness assessments.

## Our Training

To embed our core values into our daily operations, CyberArk delivers mandatory training programs covering our Code of Conduct, anti-corruption, data privacy, and cybersecurity. Throughout 2025, employees engaged with these compliance modules during mandatory new joiner inductions and via ongoing e-learning channels. Our Speak Up training continues to provide practical guidance on raising concerns safely and confidently. Moving forward, CyberArk's training program is being integrated and absorbed into Palo Alto Networks' centralized global compliance framework, ensuring a unified, platform-wide approach to human rights and ethical labor practices across all joint operations.

## Approval

This Modern Slavery Act Statement was approved by the Board of Directors of Cyber-Ark Software (UK) Limited on November 4, 2026.

Signed by:

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