

## **Modern Anti-Slavery Statement**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that BeyondTrust Corporation (“BeyondTrust”) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. This statement relates to the financial year ending 31 December 2023.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. BeyondTrust has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

BeyondTrust is the worldwide leader in intelligent identity and access security, empowering organizations to protect identities, stop threats, and deliver dynamic access to empower and secure a work-from-anywhere world. Our integrated products and platform offer the industry's most advanced privileged access management (PAM) solution, enabling organizations to quickly shrink their attack surface across traditional, cloud and hybrid environments.

BeyondTrust is a Delaware corporation with its head office located in Atlanta, Georgia and we develop and license proprietary software for businesses internationally. We operate local subsidiaries in Australia, Canada, France, Germany, Singapore, the United Arab Emirates and the United Kingdom. The company has a limited number of suppliers which include hardware manufacturing and limited outsourced software development with highly reputable commercial organizations.

### Our high-risk areas

Due to the nature of our business, BeyondTrust has not identified any high-risk areas for its supply chain.

### Our operations and supply chain

No instances of modern slavery have been identified in our operations or supply chain during the financial year ending 31 December 2023.

### Our policies

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

- Code of Conduct. This Code establishes the foundation of BeyondTrust's ethics by communicating our philosophy and commitment to all our employees, customers, stakeholders, and the communities in which we do business. All employees must acknowledge receipt of our Code of Conduct on an annual basis. It is designed to deter wrongdoing and to promote:
  - honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
  - full, fair, accurate, timely, and understandable disclosure in reports and documents we file with regulatory agencies and in our other public communications;
  - compliance with applicable laws, rules, and regulations;
  - the prompt internal reporting of violations; and
  - accountability for adherence.
- Anti-Corruption Policy. This Policy is made available to all employees and is designed to uphold our values and assure compliance with anti-corruption and global trade laws in all of the countries where we operate.
- Whistleblowing. BeyondTrust has a dedicated Ethics and Compliance Hotline where staff are able to identify and report any concerns, including any instances of suspected modern slavery.
- Recruitment. We operate a robust recruitment procedure, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Modern Anti-Slavery Statement. This statement sets out our organization's stance on modern slavery and is published on an annual basis.

Our suppliers

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values. We conduct due diligence on all suppliers via our Third-Party Vendor Management program before allowing them to become a preferred supplier.

#### Training

We provide training to our staff involved in procurement activities so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

#### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

#### Review

This statement is reviewed and updated on an annual basis.

#### Approval for this statement

This statement was approved by the Board of Directors of BeyondTrust Corporation on 31 December 2023.

*Janine Seebeck*

**Janine Seebeck, CEO**

**1 January 2024**