Anti-Slavery & Human Trafficking Statement Effective Date: Jan 2023 Version Number: 1.2 Owner: Ethics & Compliance



Anti-Slavery & Human Trafficking Statement

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1. Purpose

Skyhigh fully supports the elimination of human trafficking and slavery from all business and supply chains. As such, Skyhigh is committed to ensuring that modern slavery and human trafficking do not take place in our business or supply chain in any part of our global organization. As part of this commitment, we strive to achieve the highest ethical, environmental, and employee-related standards within our business and supply chain, ensuring that employees, officers, partners, suppliers, independent contractors, and others are working together to eradicate modern slavery and human trafficking.

2. Scope

This statement to all personnel employed by or engaged in providing services to our company and includes, but is not limited to, employees, officers, and temporary employees, including U.S. and international subsidiaries, and independent contractors.

3. Statement

We believe that the nature of our business and the regulatory environment in which we operate mitigate the risks of human trafficking and slavery taking place within our company and our supply chain. We employ a technically skilled, professional labor force and do not frequently use labor brokers or other third parties to obtain labor. A substantial portion of our sales pertain to cybersecurity software licenses and related services, and our supply chain does not involve the purchase of a large volume of physical goods.

Despite our low risk, we conduct human trafficking and slavery due diligence on our vendors, suppliers, partners, and others and expect them to avoid complicity in any practice that constitutes any modality of modern slavery or human trafficking. We require prospective suppliers to complete a due diligence process during which we:

- 1. collect information from the supplier;
- review the supplier's reputation and background; and
- complete a risk-based assessment of the supplier's location and the proposed scope of work or products offered.

Subcontractors or suppliers that pose potentially higher risks of human trafficking and slavery are subject to more detailed risk assessments and additional oversight, if necessary, to help ensure compliance with our internal controls and applicable law. We have engaged FRDM, a third-party risk intelligence software solution, to provide continuous monitoring on onboarded suppliers. Designed to monitor risk within our supply chain, the FRDM system analyses our primary suppliers to identify any high-risk areas in our supply chain.



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4. Supplier Certifications

Our suppliers are contractually required to comply with applicable laws and regulations in the U.S. and globally to provide us with manufactured goods, products, and services. Suppliers agree to implement due diligence procedures for their own suppliers, subcontractors, and other participants. They also acknowledge that neither the supplier nor its officers, employees, or associates have been convicted of any offense involving modern slavery and human trafficking and have never been the subject of any investigation by a regulatory body regarding any offense in connection with modern slavery and human trafficking.

5. Ensuring Compliance with Age Requirements

Skyhigh prohibits child labor from being used at any stage. The term "child" refers to any person under the age of 15 years old, or under the age for completing compulsory education, or the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 shall not perform any work that could jeopardize the physical or mental health or safety of young workers. Skyhigh conducts thorough age verification processes prior to hiring to ensure compliance. Legitimate apprenticeship/internship programs that comply with applicable laws and regulations are permitted. Any violations must be reported immediately to the employee's supervisor, Human Resources, Legal or through the Company's confidential ethics helpline. Reports will be treated seriously and investigated promptly, with appropriate corrective action taken as necessary.

6. Maintenance of Ethics and Compliance Program and Accountability

We maintain a broad-based corporate ethics and compliance program that addresses values, leadership, training, audits, certifications, and accountability and is intended to ensure compliance with applicable laws and a culture committed to ethics and integrity in all we do. In keeping with this commitment, we maintain robust, global supply chain programs, practices, and procedures to support the goal of ensuring that our suppliers meet our strong ethical standards and comply with applicable laws and regulations, including those prohibiting human trafficking and modern slavery.

Moreover, we have incorporated our Anti-Slavery and Human Trafficking Statement into our Code of Conduct, which is compulsory for all Skyhigh employees. We also promote targeted awareness through various methods, including corporate communication campaigns and postings on our internal and public websites.



7. Reporting Concerns

We expect and encourage our employees and business partners to raise any concerns regarding violations of law, regulations or our standards of business conduct. The Skyhigh Skyhigh Ethics and Compliance Helpline is available 24 hours a day, 7 days a week and allows for anonymous reporting where permitted by law.

8. Revision History

VERSION	DATE PUBLISHED	CONTRIBUTORS	PREPARED BY	SUMMARY OF CHANGES
1.0	01/2023	Dir. Legal	Ethics & Compliance	Initial policy launch
1.1	05/2023	Dir. Legal	Ethics & Compliance	Skyhigh Branding updates
1.2	01/2025	Dir. Legal	Ethics & Compliance	Updated to address hiring guidelines

9. Approvals

VERSION	DATE PUBLISHED	PREPARED BY	CONTRIBU TORS	BUSINESS UNIT	APPROVERS
1.0	01/2023	Legal	Dir. Legal	Ethics & Compliance	Dir. Legal
1.1	05/2023	Legal	Dir, Legal	Ethics & Compliance	Dir. Legal
1.2	01/2025	Legal	Dir, Legal	Ethics & Compliance	Dir. Legal

