

# DARKTRACE MODERN SLAVERY STATEMENT

(FYE 30<sup>TH</sup> JUNE 2022)

DARKTRACE

## Statement

1. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Darktrace plc, on behalf of itself and its wholly-owned subsidiary Darktrace Holdings Limited (together with the subsidiaries of Darktrace plc and Darktrace Holdings Limited, the "Darktrace Group") has taken during the fiscal year ended 30th June 2022 ("FY 2021-22") and will continue to take to ensure that modern slavery or human trafficking is prevented.
2. The Darktrace Group applies a zero-tolerance approach to any form of modern slavery, servitude and forced or compulsory labour. We are committed to acting with transparency in all business dealings, preventing modern slavery taking place within our business or supply chains.

## Business & Risks

Darktrace plc is a public listed company, trading on the London Stock Exchange main market for listed securities under the ticker DARK. Darktrace plc is registered under the laws of England and Wales. Its wholly-owned subsidiary Darktrace Holdings Limited is a private limited company registered in England and Wales. Taken as a whole, the Darktrace Group is a global technology services company, and during FY 2021-22, maintained approximately 46 offices worldwide.

Given the nature of the Darktrace Group's business, the Darktrace Group believes there is a very low risk that modern slavery and human trafficking would be present in its supply chains or affect its business but the Darktrace Group takes steps to review this position and identify where there may be potential risk areas in its business.

## / Products and Services

The Darktrace Group's main business is the research, development, and sale of cybersecurity software. The Darktrace Group provides its proprietary software to thousands of customers both in the United Kingdom and around the world. Customers span enterprises of all sectors and sizes. The Darktrace Group sells its software to customers directly as well as through a robust channel of resale partners. While not part of its supply chain, the Darktrace Group nevertheless expect members of our channel to adhere to our ethical standards, as discussed more below.

The Darktrace Group primarily delivers its software to customers through two avenues: by hosting instances of our software in the cloud, which is the preferred form of delivery, or, in specific and limited circumstances, by utilizing hardware appliances, on which our software comes pre-installed. For hosting services, the Darktrace Group utilises industry-standard providers, namely Microsoft Azure, Amazon Web Services and Google Cloud Platform. The hardware is sourced from reputable suppliers in the United Kingdom and Ireland, with whom the Darktrace Group has longstanding relationships; and the hardware is manufactured in the United Kingdom or the Czech Republic. Additional details concerning our supplier relationships are provided in section 4, under Due Diligence, Assessment of Modern Slavery Risk & Supplier Commitments, below.

The development of the Darktrace Group software is conducted entirely in-house by employees. Sales activities are similarly conducted by employees, who are based out of Darktrace Group offices worldwide or by resale partners. Darktrace Group resale partners are subject to contracts that contain specific provisions to combat and prevent all forms of modern slavery.

## / Workforce

The vast majority of the Darktrace Group workforce are highly skilled full-time employees who are office-based and employed either by Darktrace Holdings Limited or one of its wholly-owned subsidiaries in the relevant territory. However, given the recent COVID-19 pandemic, most members of the workforce have performed their duties through hybrid models where they spent a few days per week in an office and work from home on the other days. The Darktrace Group guidance has varied by territory and been in compliance with local COVID-19 lockdown restrictions.

The Human Resources team managed the hiring of staff as well as taking responsibility for their well-being and the Darktrace Group's compliance with applicable labour laws wherever they were working.

## Policies and Training

The Darktrace Group maintains a number of internal policies and procedures throughout the business, reflecting its commitment to ethical standards and acting with integrity and transparency in its business relationships. These policies are made available as part of the Employee Handbook on the Darktrace Group internal intranet site to all employees, and to customers upon their request. All employees are required to sign a confirmation that they have read and understood the Employee Handbook policies. The Darktrace Group periodically reviews and updates our policies, including the enforcement of these policies, to reflect evolving industry norms and best practices.

- **Anti-Slavery Policy.** This policy sets out the Darktrace Group stance on modern slavery and ensures all relevant staff are alert to the risk of slavery and human trafficking occurring in our business or supply chains.
- **Whistleblowing Policy.** The Darktrace Group has a whistleblowing policy to provide protection to all employees who wish to fairly raise concerns either about how colleagues are being treated, or practices within our business or supply chains, without fear of retaliation. Since the end of the FY 2020-21 fiscal year, the Darktrace Group has engaged a third-party provider to implement an anonymous whistleblowing service, which is available in all Darktrace Group operating countries.
- **Code of Business Conduct.** The Darktrace Group has a Code of Business Conduct setting forth its ethical standards, ensuring that the Darktrace Group complies with all applicable laws in the territories where it operate. The Darktrace Group expects all employees, as well as suppliers and partners, to comply with the standards detailed therein.
- **Employee Handbook.** The Darktrace Group makes clear to all employees the actions and behaviour expected of them when representing the organisation. The Darktrace Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating its business. The Employee Handbooks detail the consequences for failing to meet these standards, which may include termination.
- **Recruitment Policy.** The Human Resources team operates a robust recruitment policy, ensuring that the Darktrace Group complies with all applicable laws in the territories where it operates. In order to safeguard against modern slavery, only reputable employment agencies are sourced to recruit Darktrace Group employees. The Darktrace Group has a zero-tolerance approach to the imposition of any financial burdens on prospective employees, such as requiring candidates to pay recruitment fees.

All employees are required to review and acknowledge these policies and certain topics are the subject of mandatory compliance trainings such as Preventing Workplace Harassment. During the FY2021-22 the Darktrace Group developed additional compliance training which our staff are required to complete on a regular basis. The Darktrace Groups continues to evaluate the training responsibilities it has as a business and will be reviewing its policies and training, including those relating to modern slavery, in the coming fiscal year to see where additions or improvements are desired. In particular, the Darktrace Group Modern Slavery Policy will set out the ETI Base Code or a similar internationally recognised code of labour practice. Within the Darktrace Group, a working group has recently been set up to assess, review and keep up to date the policies across the group in all territories. While at a fairly early stage, the group plans to evaluate the current processes for policy ownership, development, review, roll-out and enforcement.

As discussed below, the Darktrace Group has also implemented various controls including a country grading scheme to better assess risks in various territories around the world. Darktrace Group staff are advised and trained to take particular care with organisations that provide services from higher risk territories. All employees and contractors are also advised to notify the Darktrace Group Legal and HR teams immediately if they have any concerns that modern slavery is taking place within the business or supply chain, so that appropriate action can be taken.

## Suppliers

The Darktrace Group process for contracting with suppliers includes checks to remain vigilant to any risk of modern slavery and human trafficking. These may include (but are not limited to):

- Due Diligence, Assessment of Modern Slavery Risk & Supplier Commitments. It is a requirement that staff engaged in the process of selecting suppliers or resale or other partners conduct reasonable checks to ensure that suppliers or partners are held to account over modern slavery, as well as other due diligence risks. In this fiscal year the Darktrace Group has reviewed its due diligence process and intends to implement a due diligence questionnaire that specifically considers the risk of modern slavery in its supplier contracting process. The Darktrace Group may also require the suppliers/partners to provide a copy of relevant policies and their employee handbook, both to confirm their policies require onward obligations on the part of their suppliers and to confirm their policies are at least equivalent to the Darktrace Group's policies.
- Contractual Commitments. The Darktrace Group believes it has appropriate protections in our agreements with suppliers. We will never knowingly enter into a supplier agreement with an organisation which supports or is involved in modern slavery. Where necessary, there is a written requirement for suppliers to implement effective systems and controls to prevent slavery from affecting any part of the business/supply chain. The Darktrace Group can also, where appropriate, require its suppliers to provide a summary of the steps they take to prevent modern slavery, including details of any relevant policies applicable to their staff and their suppliers.
- Termination. The Darktrace Group also reserves the right to terminate a contract at any time should any instances of modern slavery come to light, however the Darktrace Group would always consider whether a remediation programme would be more appropriate in the effort to eradicate modern slavery and support the victims of modern slavery.

## Compliance with Section 54 of the Modern Slavery Act 2015

To date there have been no reports from any source, whether employees, suppliers, partners, the public, or law enforcement agencies to indicate that modern slavery practices are taking place within the Darktrace Group or supply chains. The Darktrace Group is continually committed to

keeping this policy current and relevant. This Statement will be monitored and reviewed annually. Responsibility for this Modern Slavery Statement sits with the Board of Darktrace plc, who delegate the day-to-day implementation of the policy to the General Counsel and Company Secretary, James Sporle. James Sporle has the direct support of the Legal and Risk teams, who are best placed to spot and prevent modern slavery risks in the supply chain and in managing compliance and risk reviews, and the Human Resources team and the Executive Team,

## Approval

This Statement was approved by the Board on 18 November 2022

Signed

**Gordon Hurst, Chair**

18 November 2022

## About Darktrace

Darktrace (DARK.L), a global leader in cyber security artificial intelligence, delivers complete AI-powered solutions in its mission to free the world of cyber disruption. Its technology continuously learns and updates its knowledge of 'you' for an organization and applies that understanding to achieve an optimal state of cyber security. It is delivering the first ever Cyber AI Loop, fueling a continuous end-to-end security capability that can autonomously prevent, detect, and respond to novel, in-progress threats in real time. Darktrace employs over 2,100 people around the world and protects over 7,700 organizations globally from advanced cyber-threats.



Scan to  
LEARN MORE