

COFENSE MODERN SLAVERY ACT TRANSPARENCY STATEMENT

As Cofense Inc. (together with its affiliates and subsidiaries, “Cofense”) continues to expand globally, we are committed to complying with all applicable U.S. and International laws. In accordance with this mission, we make this Modern Slavery Act Transparency Statement (this “Statement”) pursuant to our obligations under the U.K. Modern Slavery Act 2015.

Cofense does not tolerate any forced labor, human trafficking, or slavery (“modern slavery”) in our operations and global supply chain. Our Compliance team is dedicated to addressing the risks of modern slavery within our organization and global supply chain, and this Statement outlines the steps we are taking to assess and minimize such risks.

Business Overview

Cofense is the leading provider of human-focused anti-phishing solutions and phishing threat intelligence to clients across the globe. We are headquartered in Leesburg, Virginia, USA, however we are a global company and have offices in several countries around the world.

We sell our software and professional services to other businesses who are looking to strengthen their defenses against persistent cybersecurity threats. Our products are designed to enable our customer’s employees and incident response teams to better identify, report, and respond to targeted phishing attacks.

Cofense’s workforce is made up of technically skilled and knowledgeable people, and employment with us is entirely voluntary. Our Human Resources team conducts a rigorous selection process, and the individuals we hire are compensated with a competitive salary.

Our Supply Chain and Risk Assessment

As a cybersecurity company, our suppliers are generally involved in professional services, sales and marketing, office procurement, and other typical business functions. We are not involved in manufacturing or sourcing raw materials and do not operate in a retail capacity.

Considering the products and services Cofense sells, and the types of goods we normally procure to run our business, we believe that we pose a low risk of participating in modern slavery. We are not aware of, nor have any reason to suspect, any actual or alleged occurrences of modern slavery existing in our operations or our supply chain.

Should we become aware of allegations regarding modern slavery in our business, or that of our suppliers, we will review the situation promptly and take appropriate action, including reporting the matter to the proper authorities where required.

Our Measures Against Modern Slavery

Cofense is committed to doing all we can to make sure there is no human trafficking and modern slavery in our supply chains. Our standard vendor agreements include language conveying the ethical standards we demand of our vendors, including a representation by our vendors that they will take reasonable steps to ensure there is no modern slavery or human trafficking in their supply chains.

We have incorporated a Supplier Code of Conduct into our vendor due diligence process, which highlights the conduct requirements we expect from our Vendors. The Code of Conduct also provides for resolution should a vendor or their vendor(s) be found to be engaged in forced labor, modern slavery, or human trafficking. We require vendors to reaffirm their commitment to these principles in our annual due diligence review.

Modern slavery and human trafficking are also covered in our internal Cofense Global Code of Conduct. Our employees are required to review and acknowledge our Code during our annual compliance training.

Cofense understands that our business operations and vendor relationships are dynamic and will change over time as we grow. Pursuant to the U.K. Modern Slavery Act 2015, we will evaluate and make any necessary changes to this Statement as soon as reasonably possible at the end of each financial year.

This Statement has been reviewed and approved by Cofense Inc. Board of Directors and covers the financial year ending 2023.

A handwritten signature in black ink, appearing to be "Reena Paraguya".

Reena Paraguya
General Counsel, Chief Compliance and Privacy Officer
June 7, 2024