

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 in our operations and global supply chain. We have dedicated our Compliance team to address the risks of modern slavery within our organization and global supply chain, and this Statement outlines the steps we will be taking to assess and minimize such risks.

Business Overview

Our headquarters is located in Leesburg, Virginia, USA, however we are a global company and have offices in several countries around the world. Cofense is the leading provider of human-focused anti-phishing solutions and phishing threat intelligence to clients across the globe. Our products are designed to enable employees and incident response teams to better identify, report, and respond to targeted phishing attacks. Employees of our clients become security informants armed with the knowledge to assist incident responders in the expedient resolution of phishing threats.

Supply Chains

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

Due Diligence

We are committed to ensuring 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. Internally, we will be implementing a modern slavery and human trafficking statement into our Code of Conduct. Further, we are also developing a Vendor Code of Conduct that will highlight requirements and provide for resolution should a vendor or their vendor(s) be found to be engaged in forced labor, modern slavery or human trafficking. This will take place by the end of the fiscal year.

Cofense understands that our 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 2018.



Shane McGee, General Counsel, Secretary
March 22, 2018