



ANTI-SLAVERY, TRAFFICKING, AND CHILD LABOR POLICY

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Venafi, Inc. and its group companies (together, “Venafi” or “We”) are committed to conducting business in accordance with the highest ethical standards and complying with all applicable laws and regulations regarding any form of slavery, human trafficking, and child labor. This policy demonstrates Venafi’s position against any form of slavery, human trafficking, and child labor. Venafi is the inventor and world leader of machine identity management. Venafi Parent, LP, a Delaware limited partnership, is the ultimate parent entity of the Venafi group. The Venafi group operates companies in the United States, United Kingdom, France, Australia, and Bulgaria.

1. Venafi Stands Against Slavery and Human Trafficking

Slavery and human trafficking are a fundamental violation of basic human rights. They are crimes in which a person is deprived of their liberty through exploitation for another's personal or economic gain. We believe slavery, and human trafficking, in any form, violate the principles of individual freedom and dignity.

As an industry leader, Venafi is committed to combatting modern slavery and human trafficking. We have the responsibility, both individually and collectively, to practice and enforce mechanisms by which modern slavery and human trafficking can be stopped.

We have appropriate practices in place demonstrating our commitment to ensure there is no modern slavery or human trafficking in any part of our business, as shown below:

- **We screen external vendors and those providing outsourced services**, meaning we expect our consultants, vendors and business partners (“Suppliers”) to stand against modern day human slavery and human trafficking aligning with the UK [Modern Slavery Act of 2015](#) and the US [TVPA](#).
- **We take a zero-tolerance approach against slavery and human trafficking within our spheres of influence, including our suppliers**, as outlined in the United Nations’ [Protect, Respect and Remedy Framework for Business and Human Rights](#).

- **We stay current on industry and legal standards ensuring alignment with our policies and procedures.** In turn, this means this policy may change over time in accordance with industry and legal standards.
- **We educate and train** team members on ways to identify and prevent modern slavery and human trafficking.
- **We expect team members to promptly report any violating circumstances.** We ensure no team member suffers detrimental treatment as a result of good faith reporting.

2. Venafi Stands Against Child Labor

We are committed to combatting child labor by ensuring there is no use of it in any part of our business, as shown below:

- **We only employ those of a legal age to work.** The legal age of employment is based on ILO Conventions and local laws of the jurisdictions in which we operate. We apply the same standards to our independent contractors.
- **We consider the nature and hours of work.** Even if local law would otherwise allow, our team members do not perform services where the nature of work or hours required would make it inappropriate for their age.
- **We expect our vendors and business partners to uphold the same standards in complying with child labor laws and regulations.** We do not tolerate inappropriate services by minors anywhere in our supply chain or ecosystem.
- **We expect team members to promptly report any violating circumstances.** We continue to ensure no team member suffers detrimental treatment from good faith reporting.

3. Compliance and Reporting

The prevention, detection and reporting of modern slavery and human trafficking in any part of our business, including with suppliers and partners, is a responsibility shared by all Venafi team members and ecosystem partners.

To implement this policy effectively, it is important that team members, partners, customers, and suppliers respond to and report good faith concerns if they have reason to believe this policy has been violated. If Venafi team members have any reason to believe modern slavery or human trafficking is being conducted in Venafi's sphere of influence, including its supply chain, they must report it to their people leader, any member of the executive team, or Venafi's legal team, or through Venafi's internal anonymous whistleblower hotline. Venafi suppliers, customers and partners should report to their regular Venafi contacts or using the "Contact Us" section of Venafi's website..

Venafi will promptly and thoroughly investigate all reports made in good faith. Venafi takes all reports of breaches of egregious matters such as modern slavery and human trafficking seriously and treats them with the highest priority. Information disclosed during an investigation will remain confidential, except as necessary to conduct the investigation, take any remedial action, and in accordance with applicable law. All team members and Venafi suppliers have a duty to fully cooperate in the investigation and answer questions truthfully. Failing to cooperate or deliberately providing false information during an investigation shall be grounds for disciplinary action, up to and including dismissal in the case of team members.

Venafi conducts regular audits which include identification of modern slavery, trafficking and child labor risks. Venafi's key performance indicators on combatting modern slavery, trafficking and child labor risks include:

- Training all Venafi team members on their legal requirements and best practices for identifying and reporting such matters anywhere in Venafi's supply chain;
- Screening all Venafi suppliers and partners for compliance with applicable regulations and that they undertake best practices to combat such matters;
- Risk assessments conducted at least annually that effectively identify such risks within Venafi's entire supply chain;
- Availability and accessibility of reporting mechanisms for Venafi team members, suppliers, partners, customers and other members of Venafi's ecosystem.

Venafi's board has adopted this policy pursuant to section 54(1) of the Modern Slavery Act of 2015 and this policy constitutes Venafi's joint slavery and human trafficking statement for each of its group entities. Signed /s/ Melissa Keohane, director, Venafi, Inc. & Venafi Ltd.