1. Statement
   1.1. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Darktrace Holdings Limited has taken and will continue to take to ensure that modern slavery or human trafficking is prevented.
   1.2. Darktrace Holdings Limited applies a zero-tolerance approach to any form of modern slavery. We are committed to acting with transparency in all business dealings, preventing modern slavery taking place within our business or supply chains.

2. Our Business & Risks
   Darktrace Holdings Limited is a Private Limited Company, under the laws of England and Wales. We are a global cyber security company, with offices spanning over five continents. In light of where we do business, where our suppliers are based, and the industry in which we operate, there is a very low risk that modern slavery and human trafficking would affect our business.

3. Our Policies
   A number of internal policies and procedures are adopted throughout the business, showing we are committed to acting with integrity and transparency.
   • **Anti-Slavery Policy.** This policy sets out our 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.** We enforce 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.
   • **Code of Business Conduct.** This code permeates throughout our business and supply chains, and helps maintain a low risk of slavery and human trafficking. It is also written into our contracts with suppliers/partners where appropriate.
   • **Employee Handbook.** We make it clear to all employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating our business.
   • **Recruitment Policy.** Our HR team operates a robust recruitment policy, ensuring that we comply with all applicable laws in the territories we are based. In order to safeguard against modern slavery, only reputable employment agencies are sourced to recruit our employees.

4. Our Suppliers
   4.1. Our 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.** It is a requirement that staff engaged in the process of selecting suppliers conduct reasonable checks to ensure that suppliers/partners are held to account over modern slavery. We may also require the suppliers/partners to provide a copy of relevant policies and their employee handbook. Where necessary, verification of the working conditions of staff and contractors may be required.
   • **Contractual Commitments.** There are appropriate protections in our agreements with suppliers. 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. We can also require them to provide us with a summary of the steps they take to prevent modern slavery, including details of any relevant staff and supplier policies conducted on their suppliers.
   • **Termination.** We may also terminate a contract at any time should any instances of modern slavery come to light.
5. Training
Our staff are advised and regularly trained to take particular care with organisations that provide services from higher risk territories. Staff are also advised to notify the Darktrace 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.

6. Compliance with s.54 of the Modern Slavery Act 2015
No reports from employees, the public, or law enforcement agencies have been identified to indicate that modern slavery practices are taking place within our business/supply chains. We are continually committed to keeping this policy current and relevant - it will be monitored and reviewed annually.

7. Approval
This statement was approved by a designated Director on 29th April 2021.

Signed,

Gordon Hurst
Chairman of the Board
29th April 2021