

Modern Slavery Act 2015
2023 Modern Slavery and Human Trafficking Statement

1. Introduction

- 1.1 This statement is made pursuant to section 54 Modern Slavery Act 2015 and sets out our actions to understand potential modern slavery risks in relation to our business, and to put in place steps aimed at ensuring that there is no slavery or human trafficking in our business and supply chains. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.
- 1.2 We consider that the nature of our business presents a relatively low risk of modern slavery and human trafficking occurring within either our business or supply chains. The majority of our workforce is professional and technically skilled, and because we produce software and provide services, our supply chain rarely involves the purchase of physical goods and limited, if any, use of vulnerable workers. Nevertheless, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking, and are committed to improving our practices in this regard and combatting any modern slavery and human trafficking in our business and supply chains.
- 1.3 Whilst this statement relates to our UK business only, our approach to modern slavery and human trafficking is consistent across the Proofpoint group of companies (the **Group**).

2. Organisation's Structure

- 2.1 Proofpoint Limited is an UK subsidiary of Proofpoint, Inc – a company incorporated in the United States of America.
- 2.2 We are a cybersecurity vendor that provides software and services designed to protect people, data and brands from advanced threats and compliance risks worldwide.
- 2.3 The Group has over 4,000 employees worldwide and has offices in 19 countries: Australia; Austria; Brazil; Canada; Denmark; France; Germany; Israel; Italy; Japan; the Republic of Korea; the Netherlands; Portugal; Singapore; Spain; Sweden; Switzerland; the United Kingdom; and the United States of America. Proofpoint Limited has over 450 employees and is primarily dedicated to the Group's business in the UK.

3. Our Supply Chains

- 3.1 Our supply chains include software as a service, hardware, software and data centre providers, graphic designers and self-employed independent contractors, that are engaged from countries that span across the globe.
- 3.2 Ancillary service providers such as valet parking attendants, cleaners, security, catering and maintenance are engaged through other, third-party companies.

4. Our Policies on Slavery and Human Trafficking

- 4.1 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business, and would never knowingly do business or work with any partner who engages in human rights violations, whether it involves trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour or deceptive recruitment for labour or services.
- 4.2 We comply with all applicable laws and regulations in those countries in which we operate and expect our business partners to do the same.

5. Relevant Policies

- 5.1 We endeavour to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to identify and eliminate modern slavery and human trafficking so as to ensure that it is not taking place anywhere in our business or in any of our supply chains.
- 5.2 We also maintain standards and procedures for employees and suppliers in our Business Conduct Guidelines and Supplier Code of Conduct.
- 5.3 Additionally, we are committed to individuals' rights to work freely, bargain collectively and be compensated fairly, and do not permit discrimination against or harassment of our colleagues who choose to be represented by a trade union.

6. Due Diligence Processes for Slavery and Human Trafficking

- 6.1 As part of our initiative to identify and mitigate risk we are in the process of implementing an enhanced supplier due diligence process through the introduction of a new due diligence questionnaire. This requires our suppliers to confirm that they have put in place adequate procedures to ensure that they are not, whether directly or indirectly involved in any modern slavery or human trafficking, and supports us in:
 - 6.1.1 identifying and assessing potential risk areas in our supply chains;
 - 6.1.2 mitigating the risk of slavery and human trafficking occurring in our supply chains;
 - 6.1.3 monitoring potential risk areas in our supply chains; and
 - 6.1.4 protecting whistle blowers.
- 6.2 The introduction of this questionnaire is ongoing. We will monitor and keep this process under review in order to respect our commitment to developing and implementing ethical trading, sourcing and procurement.

7. Supplier Adherence to our Values

- 7.1 We are committed to working together with our suppliers, vendors and business partners to maintain fundamental labour law and human rights standards. As such we expect high standards from each of our suppliers.

8. Training

- 8.1 We offer training to all of our employees which highlights the importance of diligence in our hiring practices and our commitment to ethical trading standards.
- 8.2 We monitor and update employee training where appropriate.
- 8.3 In order to eradicate modern slavery and human trafficking it is important to understand the risks associated with it in our business and supply chains. As such we will continue to monitor our approach and consider further training as appropriate.

9. Our Effectiveness in Combating Slavery and Human Trafficking

- 9.1 This is a developing area and our approach will continue to evolve over time. Nevertheless, we are committed to ensuring that we adequately report our progress in eradicating modern slavery and human trafficking from our business and supply chain according to suitable benchmarks and frameworks which we will keep under review.

- To assess the effectiveness of our efforts to identify and mitigate risks of modern slavery, Proofpoint establishes guidelines and structure for its internal recruitment practices and ensures employees' knowledge and awareness of the Business Code Conduct Guidelines and other relevant policies through periodic training.

10. Further Steps

We remain committed to upholding human rights and safety in our business and supply chains and we will continue to review our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement has been approved by the board of directors of Proofpoint Limited on May 23, 2023.

For and on behalf of Proofpoint Limited

Date: 5/24/2023

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Marlise Ricci
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