

# Modern Slavery Act Statement

RedShield Security Limited recognize that although slavery, servitude, forced labour and human trafficking ('Modern Slavery') is illegal it remains a global issue.

We recognize that all businesses have a responsibility to discover and counter instances where modern slavery and human trafficking is taking place waithin their businesses and supply chains. This is a responsibility RedShield takes seriously and we prohibit human trafficking and the use of involuntary labor in any aspect of our business.

RedShield fulfill their responsibility to respect human rights in the following ways:

- 1. This policy commitment to meet our responsibility to respect human rights
- 2. Utilization of processes that identify, prevent, mitigate, and account for how we address our impact on human rights

#### **Our Business**

RedShield is a security company that works to protect its subscribers' web assets from attack. We are committed to operating with the highest level of ethics and integrity.

This includes ensuring that our suppliers and vendors are also committed to ethical employment practices. We commit to abide by anti-slavery and human trafficking laws, including the U.K. Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018. This statement is provided as an overview of the actions that RedShield follows to ensure that we are not engaged in the use of involuntary labor.

RedShield strives to make constant improvements to workers' employment and workplace conditions and this includes the prevention of forced, bonded and trafficked labour. We do this through policies and our Modern Slavery Act Statement, these are supported by our organization and senior leadership team.

We are committed to follow and uphold the laws and regulations in all countries where we operate. Key principles and practices of our ethical business approach are set down for our employees in our Code of Conduct which addresses the following.

- Examples of behavior that contribute to creating a positive environment
- Examples of unacceptable behavior
- Procedures for the reporting and enforcement of suspected noncompliance

Other relevant policies include:

- Disciplinary process
- Health & Wellbeing Policy

## Modern Slavery Risk

The risk of modern slavery within the direct business operations of Information Technology services companies tends to be low as we rely on a highly skilled professional workforce, and currently RedShield do not operate in high-risk geographies.



However, we are increasingly acknowledging that RedShield are in fact exposed to modern slavery risk through our supply chain. For example the disposal stages of our IT devices.

RedShield is committed to ensuring that we are not supplied by anyone who engages in human trafficking or any form of slavery.

In 2019 we sought to identify and address risks of Modern Slavery in our supply chain and we have joined Sedex, a leading ethical trade service provider that seeks to improve working conditions in global supply chains. This has allowed us to share information about our business by completing a comprehensive set of questions that focus on our ethical and labour standards and to be able to share this with peer organisations.

We commit to the following activities:

- Identify Modern Slavery as a formal business risk.
- Review our procurement processes to identify Modern Slavery as a risk to be identified and assessed.
- Create and regularly review our policy on Modern Slavery.
- Include training on the risks of Modern Slavery into our induction for Senior Roles.
- Include consideration of Modern Slavery as a risk in our recruitment process.

### Supplier and Vendor Compliance Assessment

RedShield offers Internet services so the majority of our supply chain is information infrastructure related and provides for the development, provision and improvement of our network. As of March 2021, RedShield operates in 10 data centers in 4 countries and employs approximately 50 staff. RedShield recognizes the need to review our supply chain for any conditions that may put people at risk of involuntary labor.

RedShield employees are required to assist with due diligence and the evaluation of new and existing business partners, resellers, suppliers, and vendors. Concerns raised by employees of RedShield are handled by its senior management team.

Evaluations of business partners, resellers, suppliers, and vendors are reviewed annually, and in the instance that a relationship changes.

RedShield requires all suppliers and service providers to meet legal and ethical standards as a condition of doing business with us.

## **Support and Compliance**

RedShield's workforce as of March 2021 was approximately 50 employees who primarily work from RedShield's New Zealand offices, however many are home based around the world.

Employees at RedShield take mandatory compliance training and are advised of resources available to help them achieve our high ethical expectations

If employees have concerns about any wrongdoing or breaches of law, they are encouraged to raise them, the process supports doing this in confidence and without



fear of disciplinary action or retaliation.

## Statement Approval

This statement is made under section 54(1), Part 6 of the U.K. Modern Slavery Act 2015 and section 16 of the Australia's Modern Slavery Act 2018, for the financial year 2021.

This statement has been approved by RedShield's Board of Directors, and is reviewed regularly.