

Modern Slavery Statement

Introduction

At Push Security, we are committed to treating all individuals with respect and dignity. We act ethically and with integrity in all our business dealings. We recognize our responsibility to play a role in eradicating modern slavery and stand against forced labor, human trafficking or exploitation in our operations.

This Modern Slavery Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and outlines the steps Push Security has taken to prevent modern slavery and human trafficking within our business operations and supply chains during the financial year ending 31 December 2024.

Our Business Structure

Push Security is a leading provider of browser-based identity threat detection and response (ITDR) services. With operations in the United Kingdom and the United States, we develop and sell our cybersecurity software-as-a-service solution to customers globally, both directly and through our partner network, enabling businesses to prevent browser-based identity attacks.

We employ skilled professional workers on competitive wages and limit use of third parties. Our business is supported by technical infrastructure, including cloud hosting, predominantly in the EU. While our workforce is fully remote and our operations are primarily technology-driven, we acknowledge that risks related to modern slavery can exist, particularly within our supply chains and service providers.

Our Policies and Commitment

We are committed to maintaining high ethical standards and ensuring that modern slavery and human trafficking are not present in our operations or supply chains. Our approach includes the following policies and measures:

1. **Ethics and Acceptable Conduct Policy:** Our Ethics and Acceptable Conduct Policy outlines our commitment to human rights, ethical labor practices, and compliance with applicable laws and regulations. We require our suppliers and partners to adhere to similarly high ethical labor standards, including prohibitions on forced labor, child labor, and exploitative practices.
2. **Whistleblowing Policy:** Our whistleblowing policy provides a secure channel for employees to report any concerns related to unethical behavior without fear of retaliation.
3. **Equal Opportunities and Diversity measures:** We are committed to fostering an inclusive workplace that upholds the rights and dignity of all employees.

Our Supply Chains

Our supply chains primarily consist of technology providers and cloud hosting. While our industry is generally considered low-risk for modern slavery, we recognize that risks may arise in areas such as where labor practices may vary in different regions.

We aim to work with suppliers who share our values and commitment to ethical practices. These are often the market leaders in their area of expertise with operations in the EU or the USA.

Risk Assessment and Due Diligence

To mitigate risks related to modern slavery, we have implemented the following processes:

1. **Supplier Risk Assessment:** A due diligence assessment is performed for each sub-processor, vendors critical to operations of Push, and other vendors that represent significant risk to the organization. We assess risk based on geographic location, industry sector, adherence to strict laws and regulations such as privacy laws, compliance with our policies to not sell or share data beyond what is reasonably necessary for the intended purpose and the nature of the services that will be provided. We document the outcomes on a dedicated intranet page.
2. **Contractual Obligations:** We require suppliers to comply with laws and provide transparency in their own supply chains and enforce this in contracts. We want our suppliers to adhere to standards that are similar to those we set for ourselves, for example in our Ethics and Acceptable Conduct policy.
3. **Due Diligence and Monitoring:** Where appropriate, we conduct due diligence or request certifications to ensure compliance with our standards.
4. **Internal Training:** Our employees are trained on our Ethics and Acceptable Conduct Policy. The training covers topics such as how to identify and report illegal or immoral acts.

Looking Ahead

We are committed to continuous improvement in our efforts to prevent modern slavery and human trafficking. Over the next year, we will focus on enhancing supplier due diligence and monitoring processes. We will also explore options to extend our whistleblowing channel to all stakeholders.

Approval and Publication

This statement has been approved by the Board of Directors and is signed on their behalf.

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Adam Bateman

CEO & Co-founder of Push Security