

# Abnormal AI, Inc.

## Modern Slavery and Human Trafficking Statement

Financial Year Ended 31 January 2026

### Introduction

This Modern Slavery and Human Trafficking and Fraud Prevention Statement (the “**Statement**”) addresses the reporting requirements of the United Kingdom Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 for the financial year ended 31 January 2026 (the “**2025 Reporting Period**”).

This Statement is given on behalf of Abnormal AI, Inc., and its subsidiaries (collectively, “**Abnormal**”). Abnormal is committed to complying with modern slavery laws and effectively managing its modern slavery risks. Abnormal strives to act ethically and with integrity in all its business relationships, including by implementing and enforcing systems and controls designed to address the risks of modern slavery practices occurring in Abnormal’s operations or supply chains.

In this Statement, the collective expressions 'Abnormal', 'we', 'us' and 'our' are used conveniently to refer to Abnormal AI, Inc. and its subsidiaries. This is because, in relation to modern slavery and fraud risk assessment and management, we operate using group-wide policies and procedures. It is not intended to convey how we are structured, managed or controlled.

### Organization Structure and Operations

Abnormal offers a unique multi-tenant software-as-a service (“**SaaS**”) platform designed to protect organizations from the most sophisticated and targeted cybersecurity attacks. Abnormal is a private company incorporated in Delaware and headquartered in Las Vegas, Nevada, but has operations through its subsidiaries and various regional offices in several markets throughout the world, including the United Kingdom through its subsidiary Abnormal AI UK Ltd. and in Australia through its subsidiary Abnormal AI Australia Pty Ltd.

We do not manufacture goods or operate factories. Our workforce is primarily made up of skilled full-time employees engaged in software engineering, security, product, sales and corporate support roles.

### Operations and Risks

Overall, due to the nature of Abnormal's business as a developer and provider of a SaaS platform, Abnormal considers itself to be low risk with respect to modern slavery practices in its own operations. This assessment takes into account:

- our primary operating footprint in lower-risk countries (including the United States, Australia and countries in Europe); and

- our predominantly professional, highly skilled employee base.

We also operate in Singapore, which is recognized as medium risk in some indices. If Abnormal expands into higher-risk geographies or materially changes its operating model, we will continue to assess and, where necessary, enhance our systems and controls to mitigate modern-slavery-related risks.

### **Supply Chain and Risks**

Abnormal's suppliers primarily provide:

- software and software-as-a-service;
- professional services; and
- finished physical products such as computer hardware, office equipment and related goods, as well as certain facilities and workplace services.

Abnormal does not directly manufacture goods, supplies or physical products.

Considering recognized risk factors, we consider ourselves to be low risk with respect to slavery and human trafficking issues in our supply chains, but we recognize that risks can exist for global organizations, particularly in:

- IT and electronics manufacturing; and
- certain facilities or support services (for example, cleaning or security).

Abnormal strives to source goods and services from reputable third parties and continues to enhance its supply-chain selection and management processes with these risks in mind. Our suppliers and partners are predominantly based in the United States and Europe and are mostly technology and services providers. Only a small proportion of our suppliers provide hardware, and those vendors are typically large, multinational companies with their own codes of conduct and human-rights commitments.

We also use placement and recruiting agencies to source independent contractors and contingent workers, selected through a standard sourcing process. Abnormal expects such agencies to comply with applicable labor and employment laws.

### **Abnormal Policies and Values**

Abnormal believes that its corporate culture is critical to its success. We invest in building and maintaining a workforce and partner base that reflects high moral standards and integrity.

Abnormal maintains two primary codes of conduct (together, the "Code"):

- an Employee Code of Conduct, which applies to all employees and contractors; and
- a Vendor Code of Conduct, which applies to suppliers, vendors and other third parties.

The Employee Code of Conduct addresses, among other topics:

- acceptable behavior;
- laws, rules and regulatory compliance;
- conflicts of interest;
- gifts and hospitality; and
- outside employment.

The Vendor Code of Conduct sets minimum standards for:

- labor and human rights (including prohibitions on modern slavery and human trafficking);
- health and safety;
- environmental responsibility;
- data protection and confidentiality (as applicable);
- ethical business conduct (for example, anti-bribery and corruption, trade controls, and expectations regarding fraud and financial integrity) and;
- as well as compliance with applicable laws and our contractual terms.

In accordance with these guidelines and values, Abnormal aims to ensure that it hires and works with people and organizations that possess high ethical standards and integrity and that have zero tolerance for modern slavery or human trafficking.

### **Controls and Due Diligence Processes**

To help ensure that contractors and suppliers meet our standards, Abnormal:

- requires suppliers and partners to comply with applicable laws (including those relating to child labor, wages, working hours and working conditions);
- expects suppliers and partners to follow our Vendor Code of Conduct or maintain equivalent standards; and
- applies risk-based due diligence, with extra focus on higher-risk categories, when entering into new contracts.

Where we become aware of conduct that is inconsistent with our ethical standards or legal obligations, we will take appropriate action, which may include remediation, enhanced oversight or termination of the relationship.

In light of the UK Economic Crime and Corporate Transparency Act 2023 ("ECCTA"), we are also:

- assessing relevant fraud-related risks;
- building fraud-prevention expectations into our policies, supplier standards and controls; and
- providing training and communication on ethical conduct, accurate record-keeping and speaking up.

These steps are intended to support reasonable fraud prevention procedures for ECCTA purposes where Abnormal is in scope. Abnormal believes that no individual should be subjected to any form of modern slavery and will continue to review and enhance its processes, and to engage with suppliers and our workforce on identifying and mitigating modern-slavery risks.

## **Governance**

To ensure that Abnormal is successful in continuing to implement the foregoing efforts, the Abnormal Legal Department and PeopleOps Team oversee program responsibilities, which include:

- investigating possible violations of applicable policies or law;
- requiring contractors and vendors to alert the company and relevant authorities of possible violations;
- supporting training for new employees and periodic refresher training;
- updating relevant policies and alerting employees to any material updates; and
- otherwise promoting an atmosphere of responsible and ethical conduct.

Any employee, contractor, or third party can contact the Abnormal Legal Department by emailing [legal@abnormalsecurity.com](mailto:legal@abnormalsecurity.com) to raise questions or report concerns, including concerns related to modern slavery, human trafficking or fraud. Abnormal has zero tolerance in relation to slavery and human trafficking and does not tolerate retaliation against individuals who raise concerns in good faith.

## **Looking Ahead**

Compliance with the Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and broader human-rights and economic-crime expectations is an ongoing commitment. Abnormal will continue to:

- monitor modern slavery and fraud-related risks within its operations and supply chains;
- develop and refine its due diligence and supplier-management processes; and
- engage with key suppliers to improve awareness, review relevant policies and explore opportunities for collaboration and partnerships to combat modern slavery and related abuses.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and section 13 of the Australian Modern Slavery Act 2018 and constitutes Abnormal's slavery and human trafficking statement for the 2025 Reporting Period.