

Abnormal AI, Inc.

Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement ("Statement") addresses the reporting requirements set out in section 54(1) of the United Kingdom Modern Slavery Act of 2015 (the "Modern Slavery Act 2015") and the Australian Modern Slavery Act 2018 (the "Australian Act"). The Modern Slavery Act 2015 and Australian Act require certain businesses to disclose their modern slavery risks and efforts to mitigate those risks in their operations and supply chains.

This Statement is given on behalf of Abnormal AI, Inc., which is a reporting entity for the purposes of the Australian Act, 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 of its business relationships, which means that Abnormal takes great effort to implement and enforce effective systems and controls, including those that would address the risks of modern slavery practices occurring in Abnormal's operations or supply chain.

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 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 SaaS platform that is designed to protect organizations from the most sophisticated and targeted cybersecurity attacks. Abnormal AI, Inc. is a private company incorporated in Delaware and headquartered in San Francisco, California, but has operations through its subsidiaries and various regional offices in a number of markets throughout the world, including the United Kingdom through its subsidiary Abnormal Security UK Ltd. and in Australia through its subsidiary Abnormal Security Australia Pty Ltd.

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 operations. This is based on an assessment of Abnormal's geographical footprint against the Global Slavery Index's list of high, medium, and low risk countries. Abnormal primarily operates in lower geographic risk countries, including in the United States, Europe, and Australia. Abnormal also operates in Singapore which is recognized by the Global Slavery Index as medium risk. In the event Abnormal begins operating in higher risk areas, Abnormal will continue to assess and revise our systems and controls to ensure we mitigate our risks with respect to modern slavery.

The Abnormal workforce is primarily made up of skilled full-time employees, which further supports our low-risk status. Abnormal does, however, engage some contractors, which is addressed further below.

Supply Chain and Risks

Abnormal suppliers primarily provide software, software-as-a-service, professional services, and finished physical products, such as computer hardware, office equipment, and related goods. Abnormal does not directly manufacture goods, supplies or physical products.

Overall, due to the nature of Abnormal's business and taking into account modern slavery risk factors, Abnormal considers itself to be low risk with respect to slavery and human trafficking issues in its supply chain. However, Abnormal recognizes that risks of modern slavery and human trafficking can exist for global organizations, especially with regards to suppliers to the IT and software sector linked to electrical product manufacturing, which is a known high-risk sector.

Although some of the goods and services that Abnormal procures may be in a higher risk sector (e.g., computer hardware, cleaning services, security, telecommunications), Abnormal strives to source goods and services from reputable third parties and we continue to enhance our supply chain selection and management processes with these risks in mind. Abnormal suppliers and partners are predominantly based in the United States and Europe and are mostly technology and services providers. Only a very small percentage of Abnormal suppliers provide hardware, and those vendors are also typically large, multinational companies, with their own company codes of conduct, often including human rights commitments. Our technology and services providers include Amazon.com, Inc., Google LLC, Salesforce.com, Inc., and Microsoft Corporation, each of which have stated codes of conduct and ethics.

Additionally, Abnormal generally uses placement and recruiting agencies to source independent contractors for its workforce, and these agencies are selected following a standard sourcing process. All workers employed by Abnormal and its suppliers are subject to background checks, as allowed under applicable local law. Abnormal contractually requires its suppliers to adhere to applicable laws, including employment laws related to child labor, wages, working hours, and working conditions. Further, if Abnormal learns that any party has acted in a manner inconsistent with its ethical standards, Abnormal will take appropriate action, including termination of the relationship.

Abnormal Policies and Values

Abnormal believes that its corporate culture has been a critical component to its success. Abnormal has invested substantial time and resources in building its team and ensuring that the type of people it employs and works with have high moral standards and integrity. The Abnormal workforce celebrates diverse perspectives and unique identities, respects each other, and makes a real impact every day.

Abnormal employees, vendors, and contractors are also required to adhere to an Employee Code of Conduct (the "Code"). The Code reflects the business practices and principles of behavior that support our values and is updated regularly. Among other things, the Code sets forth guidelines regarding:

- Acceptable behavior;
- Laws, rules, and regulatory compliance;
- Conflicts of interest;
- Gift policy; and
- Outside employment.

The Code also includes mechanisms for dealing with violations, encouraging reporting and redressing concerns.

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

Controls and Due Diligence Processes

To ensure that Abnormal contractors and all those in the Abnormal supply chain comply with Abnormal values, Abnormal shall require suppliers and partners to comply with all applicable laws. Abnormal also may require certain suppliers and partners to adhere to the Code, or to certify that they have implemented their own code of conduct with the same effect. However, we recognize that in order to manage its growth and increasing risks effectively and sustainably, Abnormal must continue to improve its operational, financial, and management systems and controls by, among other things:

- effectively attracting, training, and integrating a large number of new employees, particularly members of sales and marketing teams and employees and consultants in all jurisdictions;
- enhancing information, training, and communication systems to ensure that employees are well-coordinated, well-informed, and can effectively communicate with each other and customers; and
- when entering into new contracts, undertake due diligence to ensure that the parties with whom we are doing business have the relevant policies and procedures in place to address modern slavery risks.

Abnormal believes that no individual should be subjected to any form of modern slavery and will continue to review its processes to take necessary steps within its power to prevent this from existing within its business and supply chains. Abnormal is committed to engaging with and educating its suppliers and workforce regarding modern slavery risk identification and mitigation.

A component of the Abnormal growth strategy involves the further expansion of its operations and customer adoption internationally. Operating in international markets requires significant resources and management attention and subjects Abnormal to regulatory, economic, and political risks that are different from those in the United States — e.g., the Modern Slavery Act 2015 and the Australian Act. Abnormal monitors and updates its policies in response to changing legislation and keeps its employees informed through appropriate training and updates.

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;
- requiring contractors and vendors to alert the company and relevant authorities of possible violations;
- training new employees;
- conducting regular training sessions to maintain employees' understanding of the issues;
- obtaining annual confirmations from employees as to compliance with applicable policies;
- updating policies as needed and alerting employees to any 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.

Abnormal has zero tolerance in relation to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with Abnormal's values, Abnormal has in place mechanisms for our employees, suppliers, and third parties to ask questions or to report concerns about possible violations of Abnormal policies and applicable laws, including those related to modern slavery.

Looking Ahead

Compliance with the Modern Slavery Act 2015 and the Australian Act is an ongoing commitment. As an organization, Abnormal is continuing to develop the way it works to ensure that modern slavery risks are effectively identified and managed throughout our operations and supply chains. Going forward, we intend to continue to engage with key suppliers to improve modern slavery risk awareness, review relevant policies and explore opportunities for collaboration and partnerships to combat modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and section 13 of the Australian Act and constitutes Abnormal's slavery and human trafficking statement for the financial year ending 31 January 2025.