



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

United Kingdom’s Modern Slavery Act requires all business entities that operate in the United Kingdom to publish a slavery and human trafficking statement for each fiscal year of the organization. The law also requires organizations operating in the United Kingdom to report on steps taken during the year to confirm that neither human slavery nor human trafficking is taking part in the organization’s business or supply chain. The Escal Institute of Advanced Technologies, Inc. /dba SANS Institute, and its affiliated entities (collectively referred to as “SANS”) has an entity operating in the United Kingdom and is in compliance with this law.

SANS’ COMMITMENT

SANS is a global leader in cyber security training and research. While our organization’s mission is to stop bad actors on the web, SANS also is committed to making the communities it operates in a better place. Human slavery and trafficking are horrendous crimes and SANS aims to ensure it does not occur within its organization or supply chain. SANS is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor, and all other trafficking-related activities (together, “modern slavery and human trafficking”). We are committed to fully complying with all applicable international human rights standards, labor and employment laws, rules, and regulations, and to working to mitigate the risks of modern slavery and human trafficking in our business operations and supply chains.

This statement sets out the steps SANS has taken to identify potential risks and to prevent human slavery or trafficking within the organization or its supply chain.

STEPS TO IDENTIFY RISKS AND PREVENT HUMAN SLAVERY OR TRAFFICKING

We regularly evaluate risks linked to modern slavery and human trafficking that could be caused by, contributed to, or directly linked to our business operations or supply chains. We consider the risks of modern slavery and human trafficking to be relatively low in our direct business operations as our direct workforce is largely comprised of professionally qualified or skilled personnel.

We are committed to achieving the highest standards of quality and integrity in all our business operations, and we expect suppliers doing business with SANS to share this commitment. SANS requires that our personnel are trained on and comply with our Code of Conduct, which affirms our commitment to human rights and prohibits violations of law, including labor and employment laws. More specifically, SANS does not tolerate any harassment or mistreatment by or of workers in the workplace or in a work-related situation and is committed to protect anyone raising such a concern from retaliation.

We are aware that inherent and potential risks of modern slavery and human trafficking could be present in our supply chains. As a cyber security training organization, SANS biggest risk to its operations in terms of human slavery or trafficking is in its use of hotel conference facilities to hold in-person training. Accordingly, this is our area of focus. To mitigate the risk, SANS ensures that it holds events at hotels that has appropriate Modern Slavery and Human Trafficking Policies in place. In addition, SANS assesses all hotels as part of its due diligence process to ensure each hotel has a good reputation and appropriate practices in place, including in the areas of people and culture.

Other steps to identify potential human slavery and human trafficking risks and to prevent such acts in the organization or its supply chain:



- Labor policies that protect staff from unfair treatment, and promote a fair and inclusive culture and an open-door policy for staff to relay concerns or complaints without fear of retaliation
- Recruitment practices to evaluate potential employees in line with relevant employment laws
- Wellbeing strategies and initiatives to support staff's physical and mental wellbeing, including counselling sessions
- A global customer service hotline that allows for complaints to be raised by people outside of SANS
- A Supplier Code of Conduct that outlines the standards expected of SANS' suppliers, including human rights and labor standards

ONGOING EXPECTATIONS

SANS is dedicated to doing its part to eliminate human slavery and human trafficking in its organization to better the communities it operates in. This includes respecting the human rights of both SANS staff and the labor force of our suppliers. We are committed to creating an environment in which our employees conduct operations under the highest ethical standards and also have resources available to report concerns within the organization without fear. In addition, SANS does not tolerate human slavery or human trafficking within its supply chain as required by our Supplier Code of Conduct. SANS acknowledges its biggest risk factor is in its relationship within the hotel industry, and SANS has due diligence protocols in place to ensure hotels have human trafficking and human slavery policies in place as a condition to do business with SANS.

This concludes the FY 2024 Modern Slavery Act risk assessment and Statement.