
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Fiscal Year 2026

Under the United Kingdom's Modern Slavery Act 2015, certain commercial organisations operating in the UK are required 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 place in the organization's business or supply chain. The Escal Institute of Advanced Technologies, Inc. doing business as SANS Institute, and its affiliated entities including its United Kingdom entity SANS Training - UK Limited (collectively referred to as "SANS") operate in the United Kingdom in compliance with this law.

SANS' COMMITMENT

SANS is a global leader in cybersecurity training and research. While our organization's mission is to combat cyber threats and strengthen global cybersecurity, 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.

ORGANIZATION STRUCTURE AND OPERATIONS

SANS operates primarily as a digital cybersecurity training provider with a distributed workforce model. Our operations include:

- Corporate headquarters in the United States with a largely remote workforce
- International offices in the United Kingdom, Singapore, Japan, Australia, and The Netherlands
- Training delivery through digital platforms and in-person events at hotel and conference venues globally
- Content development and instruction through a network of industry expert contractors and full-time employees

As a digital services organization, SANS has a limited physical supply chain, which inherently reduces certain modern slavery risks associated with complex manufacturing operations. However, we recognize that modern slavery risks can exist in any supply chain, and we maintain appropriate due diligence across all our operations and supplier relationships.

RISK ASSESSMENT AND SUPPLY CHAIN MAPPING

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 operating primarily in jurisdictions with strong labor protections, including the United States, United Kingdom, Singapore, Japan, Australia, and The Netherlands.

We have conducted a comprehensive assessment of our operations and supply chain and identified the following areas requiring ongoing due diligence:

Hotel and Conference Venues: Our use of hotel conference facilities for in-person training remains a key focus area. The hospitality industry has documented modern slavery risks globally. We ensure that we hold events at hotels that have appropriate Modern Slavery and Human Trafficking policies in place. SANS assesses all hotels as part of our due diligence process to ensure each venue has a good reputation and appropriate practices in place, including in the areas of people and culture.

Technology Hardware Procurement: SANS procures laptops and technical equipment for all staff through established technology solutions providers. We recognize that electronics manufacturing supply chains present documented risks of forced labor, particularly in component manufacturing and raw material extraction. The technology sector has well-documented concerns regarding labor practices in global electronics supply chains. As part of our vendor due diligence, we review our suppliers' Modern Slavery Act compliance statements where available and rely on their due diligence processes and supplier oversight.

Promotional Items: We procure promotional items (branded merchandise including drinkware, apparel, and marketing materials) through established promotional products suppliers. Promotional product manufacturing often involves extended global supply chains. Where our suppliers are subject to Modern Slavery Act reporting requirements, we review their published compliance statements as part of our vendor due diligence.

Printed Training Materials: We procure printed training materials including courseware books through printing services providers. While printing represents a lower risk category compared to other manufacturing sectors, we conduct appropriate vendor due diligence to understand manufacturing locations and labor practices.

Contractor and Instructor Engagement: SANS engages industry expert contractors globally for instruction delivery and content development. Our contractor workforce consists primarily of

highly skilled cybersecurity professionals based predominantly in the United States, with additional contractors in the United Kingdom, Singapore, Japan, and other jurisdictions with strong labor protections. We have implemented recruitment practices that ensure compliance with the Employer Pays Principle (no worker should pay for a job) and compliance with applicable labor laws in each jurisdiction where we operate.

Cloud Infrastructure: We utilize tier-one cloud service providers for our digital training platform. We review our providers' published Modern Slavery Statements where available and consider their labor practices as part of our vendor relationships.

Supply Chain Mapping: We have mapped our direct (Tier 1) suppliers across all these categories. For suppliers subject to Modern Slavery Act reporting requirements, we rely on their published statements and due diligence processes. We acknowledge limitations in our ability to map beyond Tier 1 suppliers, particularly for promotional items and certain hardware components where our suppliers manage complex global supply chains. We are working to increase supply chain visibility through ongoing vendor engagement and requesting transparency from our direct suppliers regarding their own supply chain due diligence practices.

POLICIES AND GOVERNANCE

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 be 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.

Our approach to preventing modern slavery is supported by the following policies and practices:

- 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 and contractors in line with relevant employment laws and the Employer Pays Principle
- Wellbeing strategies and initiatives to support staff's physical and mental wellbeing, including counseling services
- 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
- Contractual provisions with suppliers requiring compliance with applicable labor laws and prohibiting forced labor

DUE DILIGENCE PROCESSES

SANS implements risk-based due diligence proportionate to identified risks in our operations and supply chain:

Venue Due Diligence: Prior to contracting with hotels and conference facilities, we verify that venues have modern slavery policies in place and assess their reputation and practices. We prioritize venues that demonstrate commitment to ethical labor practices and worker wellbeing. This assessment is conducted as part of our standard event planning process for all in-person training events globally.

Technology Hardware and Promotional Items Vendor Assessment: For suppliers of technology equipment and promotional items who are subject to Modern Slavery Act reporting requirements, we review their published Modern Slavery Act statements, which detail their due diligence processes for supply chain risks, including electronics manufacturing and global promotional product sourcing. Our procurement contracts include provisions requiring compliance with applicable labor laws and prohibiting forced labor throughout the supply chain. We conduct periodic reviews of suppliers' updated Modern Slavery statements where available to ensure continued alignment with our expectations.

Printed Materials Assessment: For our printing services providers, we conduct vendor due diligence appropriate to the risk level and purchasing relationship. This includes requesting information about printing locations and labor practices, and ensuring contractual provisions prohibit forced labor. For suppliers who may be below the Modern Slavery Act reporting threshold, we engage directly to understand their practices.

Cloud Services Oversight: We review the Modern Slavery Statements published by our cloud infrastructure providers where available as part of our vendor evaluation process. Our providers maintain publicly available information regarding their labor practices and supply chain due diligence.

Contractor Recruitment Practices: All contractor and temporary worker agreements include provisions prohibiting forced labor and requiring compliance with local employment laws. We ensure compliance with the Employer Pays Principle by prohibiting any recruitment fees charged to contractors for working with SANS. Our human resources team reviews recruitment practices to ensure compliance across all jurisdictions where we engage workers. We conduct background checks and verification processes in accordance with applicable laws in each jurisdiction.

TRAINING AND AWARENESS

SANS provides modern slavery training and awareness to relevant personnel within our organization:

- Human resources personnel are trained on ethical recruitment practices, the Employer Pays Principle, and compliance requirements across our operating jurisdictions

- Event planning staff receive training on venue assessment and due diligence requirements
- All employees have access to information on recognizing and reporting modern slavery concerns through our Code of Conduct and compliance resources
- Training materials are reviewed and updated annually to reflect emerging risks, regulatory changes, and industry best practices

MONITORING AND EFFECTIVENESS

SANS measures the effectiveness of our modern slavery prevention efforts through the following performance indicators:

- **Venue Compliance:** 100% of contracted venues have verified modern slavery policies in place prior to event execution
- **Supplier Assessment:** Technology hardware and promotional items suppliers with Modern Slavery Act reporting obligations have published statements that we review and document as part of our procurement process
- **Staff Training:** All procurement and human resources personnel complete modern slavery awareness training
- **Contractor Compliance:** 100% of contractor agreements include forced labor prohibitions and Employer Pays Principle compliance requirements
- **Incident Reporting:** We track concerns raised through our global customer service hotline and internal reporting mechanisms (to date, we have received no reports of modern slavery concerns in our operations or supply chain)

These metrics are reviewed annually by senior management, and areas for improvement are identified and incorporated into our compliance program.

REMEDICATION AND REMEDY

While SANS has not identified instances of modern slavery in our operations or supply chain to date, we maintain a framework for responding to any such issues should they be discovered:

If modern slavery is identified, SANS will:

1. Immediately suspend engagement with any supplier or partner involved
2. Conduct a thorough investigation to understand the scope and affected individuals
3. Prioritize support and remedy for affected individuals, coordinating with appropriate authorities and support organizations
4. Require corrective action plans from suppliers before considering any reinstatement of relationships
5. Conduct root cause analysis to understand how the issue arose and implement enhanced controls to prevent recurrence
6. Engage with relevant stakeholders including civil society organizations for guidance on effective remedy

We are committed to providing access to remedy consistent with the UN Guiding Principles on Business and Human Rights and aligned with recognized frameworks such as the Walk Free Modern Slavery Response and Remedy Framework.

CONTINUOUS IMPROVEMENT

SANS is committed to continuous improvement in our approach to preventing modern slavery in our operations and supply chain.

Enhancements Planned to be Implemented in FY 2026:

- Expanded risk assessment to comprehensively address technology hardware supply chain risks in electronics manufacturing
- Enhanced contractor engagement procedures to explicitly address and document Employer Pays Principle compliance across all jurisdictions
- Implemented comprehensive supply chain mapping across all key risk categories, including technology hardware, promotional items, printed materials, cloud services, and venue partnerships
- Developed specific performance indicators and monitoring metrics to measure program effectiveness
- Established formal remediation framework aligned with international best practices
- Enhanced training program for procurement, human resources, and event planning personnel
- Implemented systematic review process for Modern Slavery Act statements from all major suppliers subject to reporting requirements

Planned Actions for FY 2027:

- Increase transparency efforts with suppliers to better understand practices beyond Tier 1, particularly for promotional items and hardware components
- Conduct direct engagement sessions with key suppliers to communicate expectations and discuss modern slavery due diligence approaches
- Enhance vendor assessment processes to gather more detailed information about supply chain practices and risk management
- Explore opportunities to participate in industry collaborative initiatives on technology sector supply chain due diligence
- Explore opportunities to expand stakeholder engagement to include consultation with civil society organizations working on modern slavery issues

We will continue to report on our progress in future annual statements, demonstrating year-on-year advancement in our modern slavery prevention efforts and responding to evolving guidance and best practices.

GOVERNANCE AND APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes SANS Institute's slavery and human trafficking statement for the fiscal year ending 2026.

SANS is dedicated to eliminating human slavery and human trafficking in our operations and supply chains. This includes respecting the human rights of both SANS staff and the workers throughout our supply chain. We are committed to creating an environment in which our employees and contractors operate under the highest ethical standards and have resources available to report concerns without fear of retaliation.

SANS does not tolerate human slavery or human trafficking within our operations or supply chain. We acknowledge that our key risk areas are in hotel venue partnerships, technology hardware procurement, and promotional items supply chains. We maintain due diligence protocols appropriate to these risk levels and are committed to continuous improvement in our approach.

This statement has been approved by the Board of Directors of SANS Training – UK Limited and by the President of The Escal Institute of Advanced Technologies, Inc. on behalf of the Board of Directors on April 1, 2026.

This statement is published on the SANS Institute website at www.sans.org/legal and is linked through the [Legal](#) link on our homepage.



James Lyne
President and CEO