

TRUSTWAVE'S MODERN SLAVERY STATEMENT

1. Introduction

Trustwave Holdings, Inc. and its subsidiaries (“**Trustwave**”) are absolutely committed to our practices to combat slavery and human trafficking in our business and supply chain.

In accordance with Section 54 of the Modern Slavery Act 2015, this statement sets out Trustwave’s position and its actions in the past financial year to ensure slavery and human trafficking do not take place in our business and any party of our supply chains.

2. Our organisational structure and services

Trustwave is a services provider in the cybersecurity sector. We are wholly owned by MC2 Titanium LLC, which is a subsidiary of the ultimate parent company, The Chertoff Group LLC. We have approximately 1,000 employees worldwide and operate in the following countries: Australia, Belgium, Canada, Colombia, Germany, India, Japan, Mexico, New Zealand, Philippines, Poland, Singapore, South Africa, the United Kingdom, and the United States of America.

Our business is organised into 7 business units:

1. Managed Security Services & Technology Management
2. Database Security
3. Email Security Services
4. Penetration Testing
5. Digital Forensics & Incident Response
6. Consulting & Professional Services
7. Third Party Product Resale

3. Our supply chain

In fiscal year end 31 March 2025, Trustwave purchased from suppliers across the following broad categories:

- Business services (e.g., administrative, advisory, and corporate services)
- Facilities and premises services (e.g., maintenance, food services, real estate, security)
- Marketing services (e.g., analyst reports, event sponsorship)
- Software and software services
- Hardware and technical products and services
- Telecommunications
- Travel and entertainment (e.g., business travel and meals, coordinator services)

4. Our policies on slavery and human trafficking

This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We also have the following policies in place relevant to modern slavery, which we regularly review and update:

- Trustwave Group Whistleblower Policy:
- Procurement policy
- Code of Business Conduct

- Anti-bribery & Corruption Policy
- Fraud Investigation Policy

Trustwave's Legal Department is responsible for and maintains the above policies in conjunction with Trustwave's Human Resources Department. Further we have a dedicated compliance committee that meets to review Trustwave's adherence to these policies and Section 54 of the Modern Slavery Act of 2015. Trustwave also maintains an independent internal audit function which performs risk-based audits on policy management and compliance activities.

5. Due diligence

Trustwave undertakes due diligence when considering new suppliers and regularly reevaluates existing suppliers, Trustwave's due diligence activities include:

- creating a risk profile for each supplier
- verification and review of purchase terms
- running trade compliance and modern slavery checks on each supplier as needed

Last Reviewed on 01 August 2025


Joel Smith (Jul 22, 2025 11:22 CDT)

Joel Smith

Trustwave Chief Administrative Officer, Corporate Secretary, & General Counsel

Date: 22-Jul-2025

Trustwave Group Modern Slavery Statement (01 August 2025)

Final Audit Report

2025-07-22

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