



Updated as of December 2024

## **BigID Statement on Modern Slavery**

BigID Inc., inclusive of its group companies and subsidiaries, (collectively, “BigID”) is a leader in data security, privacy, compliance, and governance: enabling organizations to proactively discover, manage, protect, and get more value from their data in a single platform for data visibility and control.

### **BigID Commitment:**

BigID is committed to protecting human rights and upholding the Commonwealth Modern Slavery Act of 2018. BigID believes it is everyone’s responsibility to act with integrity and respect for the rights of every human being. BigID is committed to maintaining the highest moral, ethical, and legal standards of conduct and corporate responsibility.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. BigID has a zero-tolerance approach to any form of modern slavery, human trafficking, or other forced or child labor. BigID unequivocally supports the elimination of human trafficking, modern slavery, and any other forms of forced or child labor and strives to comply with the global laws and regulations governing modern slavery, human trafficking, or forced labor.

BigID has published this statement against modern slavery, human trafficking, and other forced or child labor to emphasize its commitment to anti-slavery as one of its core corporate values and to detail its undertaking to ensure that modern slavery, human trafficking, child labor, or any form of forced or compulsory labor do not inhabit any part of BigID’s business operations.

### **About BigID:**

BigID is a leading software technology company in the data security, privacy, compliance, and governance space.

#### **1. BigID Structure:**

BigID is a private corporation incorporated under the laws of the State of Delaware, USA. It is the parent company of various affiliates, a list of which can be found at <https://bigid.com/sub-processors/>. Under its CEO, Dimitri Sirota, BigID is comprised of seven departments: Finance, Engineering, Legal, Alliances, Sales, Product, and Marketing. Along with its CEO and leadership team, BigID is led by its Board of Directors, a list of whom can be found at <https://bigid.com/company/#/>. BigID currently employs more than 500 persons across the globe.

#### **2. BigID Operations:**

BigID licenses a proprietary software platform utilized by its global customer network for Cataloging, Classification, Clustering, and Correlation of particular data sources. The platform enables customers to discover and classify data of all types within their existing data repositories. Customers can then use BigID’s integrated tools to help manage, protect, and attain more value from their data.



Updated as of December 2024

### 3. BigID Supply Chain:

As a software company, BigID does not manufacture, produce, or distribute hardware, physical goods or commodities. BigID's supply chain consists of software, technical support services, professional services, sales agents and marketing services. BigID also engages various third party vendors to provide technology related services that support BigID in its day-to-day operations. These vendors are located primarily in the United States the EEA, and have undergone commercially reasonable vetting processes in accordance with BigID's procurement policies, which are designed to ensure vendors provide their services professionally and ethically. BigID regularly procures software and related tools, consultants, legal advisors, sponsorships and partnerships from its third party commercial partners.

### Assessment of Risk:

BigID employs a technology-centric, skilled labor force and all personnel are full-consenting, voluntary employees or independent contractors who receive competitive compensation and benefits. BigID attains the majority of its workers through direct recruiting and only selectively uses recruitment firms for highly competitive skilled-roles. As a software company, BigID does not manufacture, produce, or distribute hardware, physical goods or commodities. BigID's supply chain consists of software, technical support services, professional services, and sales agents and marketing services.

The nature of BigID's business makes encountering slavery, unlawful child labor, or human trafficking in its operations unlikely. Nevertheless, BigID remains vigilant. BigID's business operations do not rely on low-wage labor or vulnerable populations such as children or immigrants. Similarly, BigID's business partners, customers, and subcontractors are generally well-established persons and entities that do not rely on vulnerable populations.

### BigID Actions:

#### 1. BigID Policies:

To reinforce BigID's commitment to combat human trafficking and modern slavery, BigID has adopted and implemented the following policies:

- a. BigID has published its statements on modern slavery and they are accessible via BigID's website ([www.bigid.com](http://www.bigid.com)).
- b. BigID reviews its corporate policies including its statements on modern slavery on an annual basis.
- c. BigID has implemented a Code of Business Conduct and Ethics Policy that is applicable to all employees, officers, agents, and directors. Among other obligations, the Code of Business Conduct and Ethics Policy contains a commitment to comply with all applicable laws and is reviewed and updated on an annual basis.
- d. BigID provides a tool via its website for confidential and, to the extent permitted by law, anonymous reporting of any suspected wrongdoing and a commitment to non-retaliation for reports made in good faith. Employees, customers,



Updated as of December 2024

partners, and individuals may go to <http://bigid.ethicspoint.com/> and follow the prompts to anonymously report concerns.

- e. BigID has instituted and published an Anti-Bribery & Anti-Corruption (ABC) Policy that is updated and reviewed on an annual basis. BigID believes human rights abuses and corruption are always entangled. BigID's ABC Policy establishes zero tolerance for corruption and bribery in its business operations.

## BigID Monitoring & Controls:


BigID has implemented policies across the organization to emphasize a commitment to lawful and ethical labor practices. BigID also requires regular compliance and security training of its employees and provides its personnel with up-to-date information regarding global compliance matters. BigID has instituted a documented procurement function in conjunction with its internal legal counsel to oversee procurement across its operations focused on the vetting of its vendors and customers. In addition, BigID has launched a publicly available reporting hotline allowing for anonymous reporting of any suspected wrongdoing. BigID is consistently reviewing and updating its internal agreement templates and has instituted contractual priorities for the many relationships BigID is a party to. BigID and its commercial counterparties contractually commit to comply with all applicable laws. BigID regularly negotiates agreements that contain specific covenants for anti-slavery and anti-forced labor policies and compliance.

## Effectiveness:

BigID consistently monitors its operations to ensure compliance with applicable law and to reduce the risk of unlawful labor practices. Due to BigID's business functions being primarily in the software technology arena, the risk of unlawful labor practices occurring within BigID and its supply chain is extremely low. Nevertheless, BigID will continue to assess its day to day operations and the effectiveness of actions it can take to address modern slavery. BigID will continue to implement internal policies that align with applicable law and industry standards and BigID's commitment to protecting human rights will remain a priority into the future.

## Consultation; Additional Information:

This statement is made pursuant to the Commonwealth Modern Slavery Act of 2018 of Australia and Section 54 of the Modern Slavery Act 2015 of the United Kingdom. This policy was drafted by BigID, approved by its Board of Directors, and is applicable across its entire organization inclusive of all affiliates and subsidiaries. BigID has no additional information to report in its modern slavery statement at this time. For further information about BigID's commitment to opposing anti-slavery and human trafficking, please utilize BigID's website or contact BigID directly.

Signed by:  
  
38CE6A1FD0514A6...

**Greg Wharton**  
General Counsel