



Modern Slavery Statement

Overview, Structure and Operations

Keeper Security, Inc. (DE File No: 3407918) (for itself and each of its affiliates, collectively “Keeper”) is a cybersecurity platform that protects passwords, secrets and connections to infrastructure. It uses zero-trust and zero-knowledge security to protect users on every device. Keeper helps prevent password-related data breaches and cyberthreats, reduces IT costs, ensures compliance with industry standards and integrates with any tech stack. With Keeper, organizations have the power to store and access unlimited passwords from different devices, to control browsing sessions, prevent data exfiltration and secure internal web applications, to provide secure remote access to cloud apps and BYOD devices, to send encrypted messages and share files with friends and groups and to provide visibility and control over employee password strength, credential sharing and more. Keeper’s global corporate headquarters is in Chicago, Illinois. Keeper also has offices in El Dorado Hills, California, Cork, Ireland and Tokyo, Japan as well as sales operations in every major region in the world. Keeper conducts business in Canada through its US entity, in the EU and UK through its Irish entity Keeper Security EMEA Limited (Reg 612466) and Australia through its US entity via a unique Australian Business Number (ABN: 73736839894).

Modern Slavery

Modern Slavery is defined in applicable law. It includes trafficking in persons, slavery, servitude, forced labor, child labor, deceptive recruiting, debt bondage and forced marriage.

Keeper takes a zero-tolerance approach to modern slavery and is committed to acting ethically to implement and enforce effective systems and controls to ensure modern slavery is not taking place within Keeper or its supply chains. Keeper expects its employees, suppliers and business partners to prevent acts of modern slavery from occurring within both its business and supply chains. We aim to work in partnership with our suppliers and business partners to ensure that they share and work towards the same values we hold, which is to conduct ourselves ethically, morally, responsibly, with integrity and in compliance with all applicable laws, including those on modern slavery.



This Modern Slavery Statement (“**Statement**”) for Keeper reflects the activities of all global operations of all Keeper entities and affiliates.

Supply Chain

Keeper’s supply chain consists of the following categories:

- Goods: Electronics; IT hardware and software
- Professional Services: Legal; Financial
- Facilities: Office leases including cleaning, security and maintenance
- Technology: Cloud hosting services; Customer Support; Payment Processing

Modern Slavery Risk Assessment

In assessing the modern slavery risks within Keeper’s supply chain, Keeper takes into consideration risk factors such as the industry and sector, country of operation, nature of workforce and goods and services involved. We identified the following industries and sectors within Keeper’s supply chain that may be exposed to a higher risk of modern slavery:

- Goods: Electronics

Suppliers within these identified industries and sectors are prioritized accordingly in Keeper’s efforts to address and manage modern slavery risks.

Addressing Modern Slavery Risks

Keeper has in place a risk management framework to address and manage modern slavery risks. The framework applies to Keeper and includes codes and policies to guide employee and third party conduct, employee training to build knowledge and awareness, supplier due diligence processes to understand and evaluate our supply chain and reporting mechanisms to identify possible instances of modern slavery. The framework is continuously being evaluated, refined and improved to remain effective and keep pace with changes to the legal, regulatory and business landscapes.



Code of Conduct

The Keeper code of conduct defines the company's expectations of our employees and guides them in carrying out their roles and responsibilities ethically, morally, responsibly, with integrity and in compliance with all applicable laws, including those on modern slavery. Our suppliers and business partners are expected to conduct themselves similarly. Keeper also expects our suppliers and business partners to hold their own suppliers to the same rigorous standards.

Employee Training

New Keeper employees undergo compliance training on the Keeper Code of Conduct as part of their onboarding process. All employees also undergo compliance training annually and acknowledge that they will comply with our Conduct of Conduct.

Supplier Due Diligence

Keeper utilizes a vendor qualification and risk mitigation process to evaluate and approve new suppliers and ensure their practices align with our values. This vetting process evaluates suppliers along various dimensions of risk.

Reporting

Keeper has a dedicated email, available 24 hours a day, 7 days a week, that is accessible to employees anytime. Reports can also be made by telephone. Keeper encourages anyone with questions or who may be aware of a violation of our employee code of conduct to immediately report the conduct to their manager and a member of the People and Talent Team. Keeper does not tolerate retaliation against an employee for reporting a concern in good faith, even when no evidence is ultimately found to substantiate the report.

Suppliers and business partners may also use the compliance as well as support email submission methods or contact our People and Talent Team in compliance with our code of conduct. All reports that Keeper receives are looked into promptly and tracked to closure.

Measuring Effectiveness



Keeper tracks and periodically reviews supplier audit and compliance reports. Keeper also solicits and monitors stakeholder feedback on the mechanisms described herein. Keeper is continually monitoring, assessing and improving all such processes.

Consultation

Keeper developed this Statement to ensure a comprehensive global approach to addressing modern slavery risks across its operations. The consultation process involved engagement between the directors and management of all entities and our corporate Legal and Compliance teams on modern slavery risks for Keeper, its current risk management measures and areas for improvement going forward.

Keeper takes a continuous improvement approach to addressing and managing modern slavery risks. For the next few years, our focus areas include enhancing our risk management capability, increasing supplier engagement and building greater internal awareness.

This Statement reflects Keeper's zero-tolerance approach to modern slavery and our commitment and efforts to addressing modern slavery risks and was approved by the Keeper Board of Directors.