

# Modern Slavery and Human Trafficking Statement



This Modern Slavery and Human Trafficking Statement (“Statement”) is made pursuant to section 54 of the UK Modern Slavery Act 2015 for the financial year ended 30 September 2023. It describes Keepit’s actions to ensure that slavery and human trafficking do not occur in our supply chains or any part of our business operations.

## Business overview

Keepit provides next-level SaaS data protection for companies with data stored in the cloud. Keepit's vendor-independent cloud dedicated to SaaS data protection is based on a blockchain-verified solution. Keepit protects data in key business applications including Microsoft 365, Microsoft Entra ID, Google, and Salesforce. Headquartered in Copenhagen with offices and data centers globally, Keepit is trusted by thousands of companies worldwide to protect and manage their cloud data.

Keepit A/S (CVR. No. 30806883), a Danish public limited liability company privately held, and its affiliates (collectively referred to as “Keepit”, “we” or “our”) adhere to the same internal governance standards as detailed in this Statement.

Keepit is not currently under the statutory requirement to publish a modern slavery statement. However, we recognize the importance of demonstrating our commitment to ensuring that modern slavery does not take place within our operations. As a global SaaS company, Keepit is dedicated to acting ethically as a good corporate citizen and maintaining integrity in all of our business relationships.

We have implemented and enforced systems and controls to ensure slavery and human trafficking do not, to the best of our knowledge, occur anywhere in our supply chains. To achieve this, we have established monitoring and risk assessment processes, as outlined in this Statement, to ensure continuous oversight of our suppliers and ongoing compliance with our obligations.

## Our supply chains

Suppliers play an important role in Keepit’s operations, helping us to drive our business and achieve our strategic objectives. Our suppliers include the following:

- Technology and software providers for IT systems utilized for Keepit’s internal operations.
- Providers of IT infrastructure and hardware.
- Facilities vendors such as office rentals, catering services, and repair services.
- Payroll service providers that help us administer employee salary and benefits.

Keepit only engages reputable suppliers with relevant experience and who are qualified for the services for which they have been contracted. We work with suppliers who share our core values and help us promote a respectful workplace environment that values ethics, complies with the law, and believes in social responsibility. Keepit’s suppliers are, in turn, required to take steps to prevent modern slavery in their own businesses and supply chains.

## Internal policies and safeguards

Keepit has implemented policies and safeguards to ensure that modern slavery is not occurring within our business or supply chains. These include:

Keepit is a software company specializing in cloud data backup and recovery, deriving from 20+ years of experience in building best-in-class data protection services at scale.

## Internal Policies

- **Keepit's Code of Conduct:** Keepit observes the ten principles of the United Nations Global Compact on human rights, labor rights, environment protection, and to combat all forms of corruption. These principles constitute the minimum standards for Keepit and are integrated in Keepit's Code of Conduct. We uphold high standards of ethical behavior and integrity among our employees, including a zero-tolerance policy towards modern slavery. Keepit's Code of Conduct explicitly prohibits the use of forced, bonded, or involuntary labor, child labor, and any form of human trafficking. Keepit requires suppliers and their subcontractors to comply with Keepit's Code of Conduct or similar standards and to verify compliance by providing information hereof and allowing access to their premises when needed.
- **Whistleblowing Policy:** Keepit provides a confidential mechanism for employees, suppliers, and other stakeholders to report any concerns related to, among others, modern slavery. The link to our Whistleblower Reporting System is found here: <https://keepit.integrityline.com/frontpage>

## Additional safeguards

- **Supplier agreements:** All new suppliers are onboarded following Keepit's procurement process and Supplier Relationship Management Policy, which require that the legal terms and conditions in supplier agreements be reviewed by Keepit's Legal team.
- **Employment policies:** Keepit has internal policies in place that account for the processes that are applied before, during, and after the hiring of employees and/or engagement of consultants. This includes the performance of screening and background check, where applicable, in accordance with relevant laws, regulations, ethics, and Keepit guidelines.
- **Diversity and equal opportunity practices:** Keepit considers itself an equal opportunity employer, basing employment decisions on qualifications, experience, and potential. Keepit has increased its focus on diversity and inclusion within the company, ensuring further that modern slavery, in any form, does not go undetected in our recruitment process.

## Due diligence and risk assessment

- Implementing our policies and procedures includes thorough due diligence on the suppliers we engage with in accordance with our procurement process. We have implemented comprehensive risk assessment and due diligence processes to prevent, among others, modern slavery within our operations. Keepit's approach includes:
- **Supplier risk assessment:** Keepit performs detailed assessments of new and existing suppliers. These risk assessments evaluate suppliers based on their relative risk to Keepit. Assessments are conducted by cross-functional stakeholders, including the Legal and Information Security teams, to ensure a comprehensive evaluation of the risk involved in engaging with the new supplier.
- **Due diligence:** Keepit conducts due diligence when onboarding new suppliers. In doing so, Keepit considers the type of activity performed by the supplier and analyzes the location of the supplier and its subsidiaries to evaluate regional risks and regulatory environments. Keepit does not select suppliers based purely on pricing but also considers location, reputation, and supplier business practices.
- **Sanction lists compliance:** Keepit strictly adheres to international sanction lists and does not conduct business with entities located in any countries or territories sanctioned by the EU, UN, or US to ensure that our operations comply with global regulatory standards.

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- **Contractual obligations:** Depending on the type of product or service provided, Keepit may include specific clauses in its contracts with suppliers to enforce compliance with our policies, integrity, and human rights standards.

## Monitoring the effectiveness of the measures taken

To ensure the effectiveness of our measures against modern slavery, Keepit reserves the right to perform regular audits of its suppliers with a focus on adherence to Keepit's ethical standards.

This includes requiring suppliers to comply with Keepit's Code of Conduct or similar standards and implement and maintain measures that minimize the risk of modern slavery within their business and supply chains.

Additionally, Keepit actively registers and monitors any complaints received through its Whistleblower Reporting System. We encourage our employees and stakeholders to report any ethical concerns, including those related to modern slavery, through the designated channels. Our commitment to conducting business with integrity involves taking all reports seriously, investigating them thoroughly and confidentially, and taking appropriate action when necessary.

## Training and awareness

We believe that awareness and education are key to preventing modern slavery. Employees are required to familiarize themselves with the Keepit Code of Conduct, which includes Keepit's commitment to respecting fundamental and internationally recognized human rights in every area in which we operate. Additionally, Keepit states in its Code of Conduct its commitment to ensure that our company does not negatively impact human rights, and that no person should be subject to ill or inhumane treatment. In turn, all suppliers, their employees, and subcontractors are required to comply with the principles in the Code of Conduct.

## Further steps

Next year, Keepit will continue to assess the effectiveness of its policies and programs to measure performance and identify areas for continued improvement. Keepit will continue to review its compliance efforts, including its due diligence processes around slavery and human trafficking to ensure that our suppliers adhere to the same values and ethics. Keepit will implement staff training where necessary and continue to monitor its effectiveness in ensuring that slavery and human trafficking are not taking place in any part of our business.

This Statement was approved by the board of directors on 14 August 2024.