

RECORDED FUTURE, INC.

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Recorded Future is committed to ensuring that no form of modern slavery or human trafficking plays any part in our business or supply chain. We strive to build and maintain a work environment that upholds the highest standards of business behavior. Our company values individuals who are ethical, work smart and share the dedication and passion that will build on Recorded Future's continued success. We expect all those that we work with to affirm our commitment to these high standards.

Our organisational structure and our business

Recorded Future is the leading threat intelligence company, providing real-time threat intelligence solutions to companies and security professionals. Our aim is ambitious: to empower our clients with intelligence to reduce risk.

Founded in 2009, we are headquartered in Somerville, Massachusetts with offices in Virginia, Sweden, and the United Kingdom. The ultimate parent company of the group is Recorded Future, Inc. with subsidiaries in Sweden (Recorded Future AB), Japan, and Singapore. Recorded Future AB has a branch in the United Kingdom.

Our staff

We have approximately 350 staff employed worldwide. These include our senior leaders, managers, development and sales teams. We know we can only operate successfully if we treat our staff with dignity and respect, wherever in the world they are based.

In more general terms, all of our recruitment procedures and practices comply with the relevant local laws, regulations and standards. We strive to provide equal opportunities to all employees, on recruitment and through the working relationship. We also have an absolute bar on the employment of minors, both within our business and all those businesses providing services to us.

Our supply chains

Given the nature of our business we have a relatively short supply chain. Our principle supplies come from providers of our operating systems, and companies which supply us with hardware and office equipment. Our main supplier is Amazon AWS, from which we rent our servers.

The remainder of our supplies are generally sourced from within the United States and the EU. We do also contract for foreign language consultation and miscellaneous support services with a variety of international companies.

Notwithstanding the relatively short nature of our supply chain, we remain vigilant to any evidence of malpractice when we engage and work with suppliers.

Our policies and principles

In 2015 we implemented a Business Conduct policy, setting out our standards and expectations for the way in which we operate. This includes a firm commitment to maintaining the highest standards of business behaviour, respecting the diverse cultures, customs, and business practices we encounter in the international marketplace, as well as compliance with both then applicable US laws and regulations that govern its operations, and local laws wherever it does business. These principles underpin all we do as a business and the way we operate, both internally and externally.

We have also implemented a whistleblowing hotline for staff to use. This is an anonymous reporting hotline, reached by telephone or via an online form, which can be used in the event that any member of staff has any concerns about the practices of any business or person within our supply chain.

Due diligence

As part of ensuring that all those within our supply chain adhere to the high standards that we expect, we work hard to identify, assess, and monitor any potential areas of risk in relation to our business and supply chains. This includes considering the length of the relationship, nature of what is being supplied and the location from where it is being supplied.

Our due diligence exercise is an ongoing and ever-present process and we will continue to look to manage any risks identified.

Assessing and managing risk

As an international business we know that we must always be aware to the potential for risk arising throughout our supply chain. As part of assessing and managing that risk we carefully consider each new supplier and ensure that appropriate contractual protections are put in place.

We do, for example, insist on there being express contractual obligations on those companies providing us with labour that they agree to pay all personnel employed to perform the work their wages, overtime pay and all employment benefits provided for under the relevant and applicable legislation wherever in the world they may be. We also ensure an absolute obligation to comply with all local laws and regulations in place from time to time.

We have also now implemented a requirement which ensures that all third party vendors and suppliers we engage with are monitored for compliance, regulatory and negative PR concerns. This ensures we will be in a strong position to identify the risk of modern slavery in the business and practices of vendors and suppliers.

Training

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. Our Legal Team are trained in the requirements of the Modern Slavery Act. We also intend to train other relevant employees to reinforce our policy and the steps to be taken in the event of any concerns.

Looking ahead

In the future we will continue to work hard to ensure that all those we do business with maintain the same high standards we do. In that respect we are implementing our ISO 9001 processes (in relation to ISO's quality management principles) which will include an annual evaluation of core vendors. This is expected to be completed by the end of 2020.

This statement is given on behalf of Recorded Future, Inc. and its subsidiaries for the financial year ending 31 December 2019. It sets out the steps taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.

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Christopher Ahlberg, CEO Recorded Future, Inc.