

Darktrace Modern Slavery Act Statement (FY 30 June 2025)

1 Introduction

- 1.1** This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Darktrace Midco I Limited, on behalf of itself and its wholly-owned subsidiary Darktrace Holdings Limited (together with the subsidiaries of Darktrace Midco I Limited and Darktrace Holdings Limited over the relevant period, the “**Darktrace Group**”) has taken during the fiscal year ended 30 June 2025 (“**FY 2025**”) and will continue to take to ensure that modern slavery and human trafficking is prevented.
- 1.2** The Darktrace Group applies a zero-tolerance approach to any form of modern slavery, servitude and forced or compulsory labour. We are committed to acting with transparency in all business dealings, preventing modern slavery taking place within our business or supply chains.

2 Business & Risks

Darktrace Midco I Limited is a privately owned company limited by shares and is registered under the laws of England and Wales. Its wholly owned subsidiary Darktrace Holdings Limited is also a private limited company registered in England and Wales. Taken as a whole, the Darktrace Group is a global technology services company which during FY 2025 maintained approximately 39 offices worldwide.

Given the nature of the Darktrace Group’s business, it is the company’s belief there is a very low risk that modern slavery and human trafficking would be present in its supply chains or affect its business but the Darktrace Group takes steps to review this position and identify where there may be potential risk areas in its business.

Products and Services

The Darktrace Group’s main business is the research, development, and sale of AI cybersecurity software. The Darktrace Group provides its proprietary software to thousands of customers both in the United Kingdom and around the world. Customers span enterprises of all sectors and sizes. The Darktrace Group sells its software to customers directly as well as through a robust channel of third parties engaged by Darktrace who are authorized to make referrals, resell and/or distribute the Darktrace products and services (“Channel Partners”). While not part of its supply chain, the Darktrace Group nevertheless expect members of our channel to adhere to our ethical standards, as discussed more below.

The Darktrace Group primarily delivers its software to customers through two avenues: by hosting instances of our software in the cloud, which is the preferred form of delivery, or, in specific and limited circumstances, by utilizing hardware appliances, on which our software comes pre-installed. For hosting services, the Darktrace Group utilises industry-standard providers, namely Microsoft Azure, Amazon Web Services and Google Cloud Platform. The hardware is sourced from reputable suppliers in the United Kingdom and Ireland, with whom the Darktrace Group has longstanding relationships; and the hardware is manufactured in the United Kingdom or Czechia. Additional details concerning our supplier relationships are provided in section 4, under Due Diligence, Assessment of Modern Slavery Risk & Supplier Commitments, below.

The development of Darktrace Group software is conducted entirely in-house by employees. Sales activities are similarly conducted by employees, who are based out of Darktrace Group offices worldwide or by

Channel Partners. Darktrace Group Channel Partners are subject to contracts that contain specific provisions to combat and prevent all forms of modern slavery.

Workforce

The vast majority of the Darktrace Group workforce are highly skilled full-time employees who are office-based and employed either by Darktrace Holdings Limited or one of the other wholly owned members of the Darktrace Group in the relevant territory. Most members of the workforce perform their duties through hybrid models where they spend a few days per week in an office and work from home on the other days.

The Human Resources team manage the hiring of employees as well as taking responsibility for their well-being and the Darktrace Group's compliance with applicable labour laws wherever they are working.

3 Policies and Training

The Darktrace Group maintains a number of internal policies and procedures throughout the business, reflecting its commitment to ethical standards and acting with integrity and transparency in its business relationships. These policies are made available as part of the Employee Handbook on the Darktrace Group internal intranet site to all employees, and to customers upon their request. All employees are required to sign a confirmation that they have read and understood the Employee Handbook policies. The Darktrace Group periodically reviews and updates our policies, including the enforcement of these policies, to reflect evolving industry norms and best practices.

Anti-Slavery Policy

This policy sets out the Darktrace Group stance on modern slavery and ensures all relevant employees are alert to the risk of slavery and human trafficking occurring in our business or supply chains. This policy was approved by the board of Darktrace Limited (formerly Darktrace plc) in May 2023 and has been communicated to all employees.

Whistleblowing Policy

The Darktrace Group has a whistleblowing policy to provide protections to all employees who wish to fairly raise concerns including in relation to how colleagues are being treated or practices within our business or supply chains without fear of retaliation. Since FY 2021, the Darktrace Group has engaged a third-party provider to provide an anonymous whistleblowing service, which is available in all Darktrace Group operating countries. All employees were reminded of this Policy and the service during FY2025.

Channel

In April 2024 the Darktrace Group introduced a third-party due diligence assessment into the onboarding process for Darktrace Channel Partners, as part of its standard business operations. This assessment requires a prospective partner to complete a 'Partner Governance Questionnaire', which now requests that Channel Partners confirm whether they have an anti-slavery or modern slavery policy in place within their company, and to provide a copy of that policy for review. If a Channel Partner does not have such a policy, or such policy is insufficient, they are required to sign a Declaration of Compliance in respect of Modern Slavery laws, by which they agree to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015 in performing their obligations under their Darktrace Partner Agreement. If a Channel Partner does not return a Declaration of Compliance where required, within 30 days of executing a Darktrace Partner Agreement, it is standard practice to terminate the contractual relationship with that Channel Partner.

Employee Handbook

The Darktrace Group makes clear to all employees the actions and behaviour expected of them when representing the organisation. The Darktrace Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating its business. The Employee Handbooks detail the consequences for failing to meet these standards, which may include termination of employment with Darktrace.

Recruitment Policy

The Human Resources team operates a robust recruitment policy, ensuring that the Darktrace Group complies with all applicable laws in the territories where it operates. In order to safeguard against modern slavery, only reputable employment agencies are sourced to recruit Darktrace Group employees. The Darktrace Group has a zero-tolerance approach to the imposition of any financial burdens on prospective employees, such as requiring candidates to pay recruitment fees.

All employees are required to review and acknowledge these policies, and certain topics are the subject of mandatory compliance trainings such as Preventing Workplace Harassment and these training courses are available on the internal company training platform. The Darktrace Group developed additional compliance training which our people are required to complete on a regular basis. The Darktrace Group continues to evaluate the training responsibilities it has as a business and reviews its policies and training, including those relating to modern slavery, on an ongoing basis to see where additions or improvements are desired. In particular, the Darktrace Group Modern Slavery Policy is based on ILO principles. Within the Darktrace Group, the working group on policies continues to assess, review and keep up to date the policies across the group in all territories and evaluate the current processes for policy ownership, development, review, roll-out and enforcement.

As discussed below, the Darktrace Group has also implemented various controls including a country grading scheme to better assess risks in various territories around the world. Darktrace Group employees are advised and trained to take particular care with organisations that provide services from higher risk territories. All employees and contractors are also advised to notify the Darktrace Group Legal and HR teams immediately if they have any concerns that modern slavery is taking place within the business or supply chain, so that appropriate action can be taken. Reporting can also be done anonymously through the Darktrace Whistleblowing hotline.

4 Suppliers & Due Diligence

- 4.1** The Darktrace Group process for contracting with suppliers includes checks to remain vigilant to any risk of modern slavery and human trafficking. These may include (but are not limited to):

Due Diligence, Assessment of Modern Slavery Risk & Supplier Commitments

It is a requirement that staff engaged in the process of selecting suppliers or resale or other partners conduct reasonable checks to ensure that suppliers or partners are held to account over modern slavery, as well as other due diligence risks. The Darktrace Group's due diligence process includes a due diligence questionnaire that specifically considers the risk of modern slavery in its supplier contracting process. The Darktrace Group requires suppliers/partners to attest that their policies are at least equivalent to the Darktrace Group's policies and to also attest that supplier/partner have not been convicted of any offence involving slavery and human trafficking nor have they been the subject of any investigation or enforcement proceedings regarding any such offence or alleged offence.

Contractual Commitments

The Darktrace Group believes it has appropriate protections in agreements with suppliers. Darktrace will never knowingly enter into a supplier agreement with an organisation which supports or is involved in modern

slavery. Where necessary, there is a written requirement for suppliers to implement effective systems and controls to prevent slavery from affecting any part of the business/supply chain. The Darktrace Group can also, where appropriate, require its suppliers to provide a summary of the steps they take to prevent modern slavery, including details of any relevant policies applicable to their staff and their suppliers.

Termination

The Darktrace Group also reserves the right to terminate a contract at any time should any instances of modern slavery come to light, however the Darktrace Group would always consider whether a remediation programme would be more appropriate in the effort to eradicate modern slavery and support the victims of modern slavery.

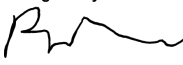
5 Continuous Compliance with Section 54 of the Modern Slavery Act 2015

To date there have been no reports from any source, whether employees, suppliers, partners, the public, or law enforcement agencies to indicate that modern slavery practices are taking place within the Darktrace Group or supply chains. The Darktrace Group is continually committed to keeping this policy current and relevant. This Statement will be monitored and reviewed annually. Responsibility for this Modern Slavery Statement sits with the Board of Darktrace Midco I Limited, who delegate the day-to-day implementation of the policy to the Chief People Officer, David Smith and the Chief Financial Officer, Suman Raju. They both have the direct support of the Legal and Risk teams, who are best placed to spot and prevent modern slavery risks in the supply chain and in managing compliance and risk reviews, and the Human Resources team and the Executive Team.

6 Approval

This Statement was approved by the Board of Darktrace Midco I Limited on 24 December 2025.

Signed

Signed by:

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Phil Pearson
Chief Strategy Officer
24 December 2025