

Behavox Modern Slavery and Human Trafficking 2025 Statement

Introduction

Behavox is the world's leading provider of AI-powered archiving, compliance and security solutions which include communications surveillance for regulated financial entities. Behavox is incorporated in the UK and operates in offices across the world, including New York, London, Montreal, Tokyo, Seattle, and Singapore. Our international presence is further strengthened by our subscribers located across the globe.

As a company that operates internationally at the intersection of artificial intelligence and financial compliance, Behavox is committed to maintaining the highest standards of ethical business conduct. This is especially critical in the financial sector, where trust, transparency, and corporate responsibility are paramount. As such, Behavox has a zero-tolerance policy towards modern slavery and human trafficking and remains committed to preventing such unethical practices within its operations and supply chain.

Risk Assessment and Business Model

Given the nature and locations of our business and operations, Behavox considers itself at low risk for modern slavery and human trafficking. Our assessment is based on the following factors:

- **Operational Geography:** The majority of our revenue comes from countries that are ranked as low-risk by globally recognized sustainability indices such as The Global Slavery Index.
- **Workforce Composition:** Our business model relies on a highly skilled workforce, including data scientists, software engineers, developers, customer success specialists, and revenue leaders. Unlike industries with large-scale, low-skilled labor, our success depends on the quality—not quantity—of work.
- **Software Development Practices:** Behavox codes its own software and develops its AI solutions in-house, reducing reliance on external supply chains where risks of forced labor could be higher.

- **Limited Supply Chain Exposure:** Our only major subcontractor is a global firm that publicly discloses its own Modern Slavery Statement, further reducing risk exposure.

While we assess our risk as low, we recognize that unethical and illegal activities can occur in any industry. Behavox is committed to implementing robust policies, oversight, and due diligence measures to mitigate any potential risks.

Policies and Procedures to Prevent Modern Slavery

Behavox has implemented comprehensive internal policies to ensure ethical business practices, fair labor conditions, and regulatory compliance in all jurisdictions where we operate. These include:

- **Ethical Hiring and Recruitment Practices:**
 - Thorough background vetting of all new hires and agency workers before employment commencement.
 - Vetting includes right-to-work verification, credit and criminal checks, terrorist screening, financial coercion verification, and professional references.
 - Our hiring processes are compliant with all relevant local labor laws, including applicable in the UK.
- **Employee Well-being and Labor Standards:**
 - Centralized employment contract management to ensure transparency and fairness.
 - Commitment to work-life balance, inclusion, and flexible working policies.
 - HR policies covering anti-harassment, health and safety, equal opportunity, and corporate culture.
 - Relevant internal policies include:
 - Paid Time Off Policy
 - Parental Leave Policy
 - Personal Leave Policy
 - Remote Work Policy
 - Anti-Harassment Policy
 - Behavox Meeting Policy
 - Diversity and Inclusion Policy
 - Behavox Code of Conduct
 - Whistleblowing Policy
 - Compensation Policy
 - Use of Company Equipment Policy

- Behavox Business Travel & Expense Policy
- Behavox Relocation Policy 2023
- Workplace Culture and Training:
 - Ongoing training programs for employees on ethical business conduct, anti-discrimination, and financial crime prevention.
 - Specific training on identifying vulnerabilities, recognizing distress, and responding to potential risks of coercion, bribery, or corruption.
- Whistleblowing and Reporting Mechanisms:
 - Employees can report concerns anonymously through an online public reporting platform.
 - Employee satisfaction surveys show that over 80% of employees feel Behavox provides a safe and ethical working environment.
 - Strong internal documentation and audit processes to monitor workplace culture and ensure ethical alignment.

Due Diligence in Business Relationships

Behavox is committed to working only with ethical organizations that uphold the highest labor and human rights standards.

- Clients: Our customers are primarily large financial institutions that are legally obligated to comply with stringent anti-slavery regulations.
- Mergers & Acquisitions: In our recent acquisition of a data software company, we conducted a thorough due diligence process to ensure that the acquired entity's policies, workforce treatment, and corporate culture aligned with our values.
- Third-Party Suppliers: We work with one primary subcontractor, a global technology provider that publishes an annual Modern Slavery Statement and adheres to ethical sourcing practices.

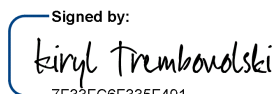
Continuous Improvement and Governance

Behavox is dedicated to regularly reviewing and enhancing our policies to prevent modern slavery and uphold the highest ethical standards.

- This statement is reviewed and updated annually.
- We commit to strengthening our supplier due diligence processes where necessary.

- Future initiatives include expanding employee training programs and refining internal audits to ensure continued compliance.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and constitutes Behavox Group's Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2025. It has been approved by the Board of Directors, as reflected by the Director's signature below.

Signed by:

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Kiryl Trembovolski
Chief Operations Officer
Behavox