

Secureworks Modern Slavery and Human Trafficking Statement

This Secureworks Modern Slavery and Human Trafficking Statement applies to the period from 01 February 2024 to 31 March 2025. Secureworks, Inc. was acquired by Sophos on 03 February 2025 and continued to operate with measures in place through the Sophos fiscal year, ending 31 March 2025.

The United Kingdom's Modern Slavery Act 2015 (the "Act") requires each business entity that meets certain criteria and undertakes business activities in the United Kingdom to prepare and publish a statement regarding the steps taken, and those that will continue to be taken, to ensure that no form of slavery or human trafficking occurs in connection with its business activities. This statement, made pursuant to Section 54 of the Act, sets out the steps that SecureWorks, Inc., a Georgia corporation, and SecureWorks Europe Limited, a United Kingdom private limited company (collectively, referred to herein as "Secureworks," "Company," "we," "our," or "us"), take, and will continue to take, to ensure that Secureworks's business does not involve any form of modern slavery or human trafficking.

Zero Tolerance for Slavery and Human Trafficking

Secureworks does not condone or tolerate any form of slavery, servitude, human trafficking, or forced labor and takes steps to ensure there is no form of slavery and human trafficking that occurs within its business and supply chains. Secureworks complies with all applicable laws in the countries in which it operates.

Our Business at Secureworks

SecureWorks, Inc. is a global cybersecurity leader headquartered and domiciled in the state of Georgia within the United States of America that operates internationally through a network of subsidiaries, including in the United Kingdom through SecureWorks Europe Limited. Secureworks offers an integrated suite of technology-driven security solutions enabled by its Taegis™ security platform and highly skilled security experts. The Taegis security platform is a purpose-built, cloud-native security platform that leverages artificial intelligence, machine learning, and actionable threat intelligence to unify detection and response across endpoint, network, cloud, and other business systems to increase the effectiveness of Secureworks's security solutions, accelerate the speed of response actions, and simplify security operations. Secureworks also provides managed security solutions and professional services, including incident response and adversarial services.

Given our strategic focus on technology-driven security solutions, enabled through our cloud-based Taegis platform, and our offerings of managed security solutions and professional services, we believe that, in our assessment, the risk is very low that modern slavery and human trafficking exist in our business and supply chain. While we do not engage in producing or manufacturing goods or hardware through factories or labour houses, we still take steps to evaluate our supply chain to identify any suppliers that pose a risk for illegal or unethical behaviour, including whether our suppliers engage in human trafficking, slavery,

bribery, anti-corruption, or other human rights violations. Our supply chain includes, but is not limited to, professional services, software services, computing and cloud services, information technology equipment, office supplies, event planning and marketing, and office space leases.

Our Approach at Secureworks

Secureworks utilizes robust policies and procedures concerning employment screening and employment conditions both internally and on its suppliers. We employ teammates who have extensive information security and professional experience. Our global team consists of employees and independent contractors, and we do not extensively use third parties to retain or employ teammates.

Our internal policies reflect our commitment to high ethics and integrity standards within our own operations and our business relationships, and we seek to implement and enforce effective systems and controls to ensure slavery, human trafficking, and other human rights violations do not occur anywhere in our business or supply chains. The implementation of our policies and the steps described in this statement are the responsibilities of each relevant group company.

We expect our teammates to act ethically and responsibly and to comply with all applicable laws. In furtherance of these expectations, we have adopted and implemented the following internal policies for our teammates:

- All Secureworks teammates must agree to abide by the [Code of Conduct](#), which can be found on our website. Each teammate is also required to complete our annual Code of Conduct compliance training.
- Our *Global Policy on Raising & Investigating Potential Ethics and Compliance Violations & Anti-Retaliation* is designed to ensure that individuals raising concerns with a reasonable belief that a suspected misconduct occurred, or cooperating in internal investigations, are protected from any form of retaliation.
- We recognize that human rights abuses and corruption often occur simultaneously. Our *Global Anti-Corruption Policy* establishes a zero tolerance for corruption and bribery in our business operations.
- Secureworks maintains an [Ethics Helpline](#) that operates globally and provides teammates and other stakeholders with an avenue to confidentially, and – to the extent permitted by applicable law – anonymously, report any suspected wrongdoing. Teammates and other Secureworks stakeholders are encouraged to report any suspicions of slavery, human trafficking, bribery, corruption, or violations of applicable law by using the [Ethics Helpline](#) tool. We believe this reporting avenue will assist us with our efforts to prevent illegal or unethical activities from occurring within our business and supply chain.

As part of our initiatives to identify and mitigate risk, we deploy cross-functional systems that screen all new prospects, customers, partners, and suppliers against restricted party entity lists globally to:

- identify and assess potential risk areas when considering new prospects, customers, partners, and suppliers, while regularly reviewing our existing supply chains, customer base, and companies with whom we partner;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

Considering our business model and employment of highly skilled professionals, we assess that the risk of slavery and human trafficking within our business and supply chain is very low. However, prior to onboarding a new supplier, we do risk-assess and categorize each supplier based on a variety of characteristics, which include, but are not limited to, the nature of their business and industry, countries of operation, and the products and services being provided to Secureworks. When a supplier is identified as presenting a significant risk, additional due diligence is conducted. Secureworks periodically re-reviews existing suppliers, the timing of which depends on the how each such supplier is categorized.

Secureworks will continue to monitor and evaluate different methods to identify and address slavery and human trafficking within our business and supply chain. We will also continue monitoring regulatory developments so that we can constantly improve our approach and internal processes.

This statement has been approved by the board of managers of Sophos Ultimate Parent GP, LLC, the general partner of Sophos Ultimate Parent, L.P. which controls each of SecureWorks, Inc. and SecureWorks Europe Limited.

Signed

Joseph H. Levy
Joseph H. Levy (Apr 28, 2025 15:38 PDT)

**Manager, Sophos Ultimate Parent GP,
 LLC**

Date: Apr 28, 2025