

Modern Slavery and Human Trafficking Statement

Financial year ended 31 December 2025 — made pursuant to section 54(6) of the UK Modern Slavery Act 2015

This is a joint statement made on behalf of the following members of the Kiteworks group (each a “Covered Entity” and together the “Covered Entities”):

- Kiteworks Europe AG, a stock corporation (Aktiengesellschaft) organized under the laws of Switzerland, with registered office at Bahnhofstrasse 29, 6300 Zug, Switzerland, registered under UID CHE-109.335.909;
- Zivver Limited, a private limited company incorporated in England and Wales (company number 11931745), with registered office at 5 New Street Square, London EC4A 3TW, United Kingdom; and
- Maytech Communications Ltd, a private limited company incorporated in England and Wales (company number 03207620), with registered office at 4 Mount Ephraim Road, Tunbridge Wells, Kent TN1 1EE.

Each Covered Entity has separately reviewed and approved this statement through its board of directors (or equivalent management body) and adopts it as its own slavery and human trafficking statement for the financial year ended 31 December 2025.

1. Introduction

Kiteworks USA, LLC, together with its subsidiaries, including the Covered Entities (collectively, the “Company” or “Kiteworks”), has zero tolerance for human trafficking and modern slavery. The Company is committed to acting ethically in all business transactions and relationships, and implements and monitors effective systems and controls designed to ensure modern slavery and human trafficking do not occur in any of its businesses or supply chains.

2. Our business and structure

Kiteworks is a secure content communications provider offering content management, communication, and protection to its customers. The group parent, Kiteworks USA, LLC, is headquartered in San Mateo, California, USA. Together with its global subsidiaries, the organisation has more than 500 employees worldwide and operates in North America, EMEA, APAC, and LATAM. The Covered Entities are the group’s contracting entities for UK public sector business, including under the Crown Commercial Service G-Cloud framework.

3. Our supply chain

Kiteworks is a software business. It does not operate manufacturing facilities and does not purchase raw materials. Its supply chain consists principally of cloud infrastructure and data-centre providers, software and IT service vendors, professional services (legal, accounting, consulting), and office space and related services, procured predominantly in North America and Europe.

4. Our policies

The Company maintains an Anti-Modern Slavery & Human Trafficking Policy (most recently updated April 30, 2024, and reviewed annually), which applies to all employees and contractors of Kiteworks entities worldwide. The policy records the Company's zero-tolerance approach, requires prompt reporting of violations or potential violations, and prohibits retaliation against anyone who raises a genuine concern in good faith.

5. Due diligence

The Company strives to include provisions in supplier contracts that prohibit the use of forced, compulsory, or secret labour and requires its suppliers to hold their own suppliers to the same standards. The Company may terminate its relationships with individuals or organisations that do not comply with applicable legal requirements, and will work with other organisations where appropriate to present a united front against human trafficking and modern slavery.

6. Risk assessment

Given the nature of the Company's business — a directly employed, professional workforce delivering software and related services, with no manufacturing or raw-material supply chains — the Company assesses the inherent risk of modern slavery in its operations and direct supply chain as low. The Company nonetheless remains alert to risk in indirect services (such as facilities and office services) and keeps its assessment under review.

7. Training and awareness

The Company ensures employees are aware of the risks of human trafficking and modern slavery and communicates its zero-tolerance policy across the organisation. Managers at all levels are responsible for ensuring that those who report to them understand and comply with the policy and any related local regulations.

8. Reporting

Incidents involving potential violations must be reported immediately. Employees may report to their immediate manager or the manager at the next level; managers must report all such incidents to the People and Places department at hr_helpdesk@kiteworks.com. Employees who are unable or unwilling to report to supervisors may report to the legal department at legal@kiteworks.com, or anonymously through the Ethics Hotline at 1-855-662-SAFE (1-855-662-7233) (voicemail or text) or at [SAFEHOTLINE.COM](https://www.kiteworks.com/safehotline) ("Submit Report"). All reports are investigated in a manner consistent with applicable local law and appropriate to the nature of the reported violation, with confidentiality maintained to the extent consistent with an adequate investigation. Retaliation is strictly prohibited and will result in disciplinary action, up to and including termination.

9. Effectiveness and review

The People and Places and Legal departments own the underlying policy and are responsible for Company-wide compliance. The policy and this statement are reviewed annually, and the Company monitors reports received through its reporting channels, including the Ethics Hotline, as an indicator of the effectiveness of its approach.

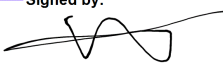
Declaration and sign-off

This statement was approved by the board of directors (or equivalent management body) of each Covered Entity on the dates set out below, and is signed on behalf of each Covered Entity by a director (or equivalent). It will be published on each Covered Entity's UK-facing website and added to the UK government modern slavery statement registry.

Kiteworks Europe AG

This statement has been reviewed and approved by the Board of Directors (Verwaltungsrat) of Kiteworks Europe AG and is adopted as its slavery and human trafficking statement for the financial year ended 31 December 2025.

Signed on behalf of the Company by:

Signed by:

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Name: Jonathan Yaron

Position: Chair of the Board of Directors (Verwaltungsrat) of Kiteworks Europe AG

Date of board approval: 9/1/2026 Date of signature: 9/1/2026

Zivver Limited

This statement has been reviewed and approved by the board of directors of Zivver Limited and is adopted as its slavery and human trafficking statement for the financial year ended 31 December 2025.

Signed on behalf of the Company by:

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Name: Wouter Klinkhamer

Position: Director of Zivver Limited

Date of board approval: 9/2/2026 Date of signature: 9/2/2026

Maytech Communications Ltd

This statement has been reviewed and approved by the board of directors of Maytech Communications Ltd and is adopted as its slavery and human trafficking statement for the financial year ended 31 December 2025.

Signed on behalf of the Company by:

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Name: Wouter Klinkhamer

Position: Director of Maytech Communications Ltd

Date of board approval: 9/2/2026 Date of signature: 9/2/2026