

Modern Slavery and Human Trafficking Statement

Zitadel, Inc

Version 1.0

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Introduction

Zitadel, Inc. is committed to upholding human rights and ethical labor practices across all its operations and supply chains. We recognize the global prevalence of modern slavery and human trafficking in various forms, including forced labor, debt bondage, and child labor. We are resolute in our commitment to preventing these egregious abuses within our business and to promoting a culture of respect, dignity, and fairness.

This statement outlines the steps Zitadel, Inc. is taking to combat modern slavery and human trafficking, reflecting our dedication to ethical conduct and compliance with relevant legislation, including the UK Modern Slavery Act 2015 and similar international frameworks.

Our Commitment

Zitadel, Inc. unequivocally condemns all forms of modern slavery, human trafficking, and child labor. We are committed to:

1. Zero Tolerance: Maintaining a zero-tolerance approach to modern slavery, human trafficking, and child labor in our own operations and throughout our supply chains.
2. Ethical Conduct and Human Rights: Conducting our business with integrity, transparency, and respect for all internationally recognized human rights. This includes ensuring fair labor practices, safe working conditions, and the absence of any form of exploitation.
3. Risk Assessment: Identifying and mitigating risks of modern slavery, human trafficking, and child labor within our business and supply chains.
4. Due Diligence: Implementing robust due diligence processes to ensure our suppliers and partners adhere to the highest ethical labor standards and respect human rights.
5. Training and Awareness: Educating our employees and relevant stakeholders on the risks of modern slavery, human trafficking, and child labor, and their role in identifying and reporting concerns.
6. Reporting Mechanisms: Providing clear and accessible channels for reporting any suspicions or incidents of modern slavery, human trafficking, or child labor without fear of retaliation.
7. Continuous Improvement: Regularly reviewing and improving our policies and procedures to ensure their effectiveness in combating modern slavery, human trafficking, and child labor.

Our Business and Supply Chains

Zitadel, Inc. operates primarily in the software and identity management sector. As a technology company, our direct operations typically involve skilled labor and professional services, which inherently carry a lower risk of modern slavery compared to industries with extensive manual labor or complex manufacturing supply chains.

However, we acknowledge that risks can exist within our broader supply chain, particularly concerning the procurement of hardware, software components, and various services from third-party vendors globally. We

are committed to working with our suppliers to ensure they share our commitment to ethical labor practices and respect for human rights.

Policies and Due Diligence

To combat modern slavery, human trafficking, and child labor, Zitadel, Inc. has implemented and will continue to enforce the following:

- Supplier Code of Conduct: We expect all our suppliers and business partners to adhere to our Supplier Code of Conduct, which explicitly prohibits modern slavery, forced labor, and child labor, and mandates compliance with all applicable labor laws, including those related to minimum wage, working hours, and safe working conditions. It also emphasizes respect for fundamental human rights.
- Supplier Vetting: Our procurement processes include vetting procedures for new suppliers, which may involve assessments of their labor practices, human rights policies, and adherence to child labor prohibitions.
- Contractual Clauses: Our contracts with suppliers include clauses requiring compliance with anti-slavery, human trafficking, and child labor laws, as well as adherence to our ethical standards and human rights principles.
- Internal Policies: Our internal policies, such as our Code of Conduct, reinforce our commitment to fair labor practices, non-discrimination, respect for employee rights, and the absolute prohibition of child labor.

Risk Assessment and Management

We continuously assess the risks of modern slavery, human trafficking, and child labor within our operations and supply chains. While our direct operations are considered low risk, we focus our efforts on:

- Geographical Risk: Evaluating suppliers operating in regions identified as high-risk for modern slavery, human trafficking, or child labor.
- Sectoral Risk: Considering the specific industry sectors of our suppliers and their inherent labor risks, particularly those with a history of child labor concerns.
- Supplier Relationships: Building long-term relationships with trusted suppliers and encouraging transparency regarding their own supply chains and human rights practices.

Training and Awareness

We are committed to raising awareness among our employees about modern slavery, human trafficking, and child labor. Relevant employees, particularly those involved in procurement and human resources, receive training to help them:

- Understand the various forms of modern slavery, human trafficking, and child labor.
- Recognize potential indicators of exploitation.
- Know how to report concerns through appropriate channels.

Reporting Concerns

Zitadel, Inc. encourages all employees, suppliers, and other stakeholders to report any concerns or suspicions related to modern slavery, human trafficking, or child labor. We have established clear reporting mechanisms, including:

- Direct communication with management.
- Confidential reporting channels.

All reports will be taken seriously, investigated promptly and thoroughly, and handled with the utmost confidentiality. We are committed to protecting whistleblowers and ensuring no individual faces retaliation for reporting concerns in good faith.

Effectiveness and Future Steps

We understand that combating modern slavery, human trafficking, and child labor is an ongoing process that requires continuous vigilance and improvement. Zitadel, Inc. will regularly review the effectiveness of our measures and will take further steps as necessary, which may include:

- Conducting periodic audits of key suppliers, with a specific focus on child labor prevention.
- Collaborating with industry peers and expert organizations to share best practices on human rights due diligence.
- Strengthening our due diligence processes for higher-risk suppliers, including on-site assessments where appropriate.

Conclusion

Zitadel, Inc. is dedicated to playing its part in eradicating modern slavery, human trafficking, and child labor. We are committed to fostering a responsible and ethical business environment and will continue to work diligently to ensure that our operations and supply chains are free from these abhorrent practices and uphold the highest standards of human rights.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Zitadel, Inc.'s modern slavery and human trafficking statement for the financial year ending 2025.