



Arctic Wolf's Report on Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act

1. Introduction

This Report is produced by Arctic Wolf Networks Canada, Inc., and covers the financial year beginning May 1, 2025, and ending April 30, 2026 (the "Reporting Period"). This report outlines the steps taken during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our supply chains, in compliance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Arctic Wolf is committed to global human rights and conducting business responsibly, ethically, lawfully and in a manner that sustains and protects our environment, our planet and people. Arctic Wolf does not tolerate the use of modern slavery in any form — including, but not limited to, human trafficking, child labor, forced labor, slave labor, prison labor, indentured servitude, or bonded labor — in our operations or value chain.

2. Structure, Activities and Supply Chain

Arctic Wolf Networks Canada, Inc., is a corporation that is wholly owned by Arctic Wolf Networks, Inc., a US corporation. Arctic Wolf Networks, Inc., headquartered in Eden Prairie, Minnesota, United States, fully owns and operates the following subsidiaries in addition to Arctic Wolf Networks Canada, Inc.: Arctic Wolf Networks Germany GmbH; Arctic Wolf Networks UK LTD; Arctic Wolf Networks Australia Pty Ltd; Arctic Wolf Networks India Private Ltd; Arctic Wolf Networks Ireland Limited; and Arctic Wolf Networks Japan G.K. Globally, Arctic Wolf employs 3,599 employees, of these 1,015 are employed by Arctic Wolf Networks Canada, Inc.

Arctic Wolf is a global leader in security operations, delivering a cloud-native security operations platform to end cyber risk. Arctic Wolf utilizes a channel sales model to provide cyber security services in thirty countries. Predominately focused on software development and delivery of services, Arctic Wolf's risk of forced labour or child labour is very low.

While Arctic Wolf is primarily a services company, Arctic Wolf may provide hardware, as part of its security solutions, to its customers during the customer's subscription term. Arctic Wolf has one hardware manufacturer located in Taiwan. The manufacturer imports the hardware into Canada, where Arctic Wolf configures the hardware and then exports the hardware to Arctic Wolf customers' locations. Arctic Wolf does not generally utilize subcontractors in the creation of its software or in the delivery of services.

3. Company Policies, Code of Conduct and Governance

During our Reporting Period, Arctic Wolf focused on its ethical, legal, and corporate responsibility to understand the risk of modern slavery that may arise in the course of conducting business. This included, but is not limited to: (a) educating our employees on the complex issue of modern slavery and how it impacts the private sector by requiring all employees to complete a





modern slavery training session to raise awareness throughout our organization, (b) requiring employees comply with our Code of Conduct and Ethics principles in order to help employees identify and prevent the risk of modern slavery impacting our operations, (c) creating more discipline around our due diligence practices when selecting our global partners, and (d) refining our operational standards to use commercially reasonable efforts to ensure that modern slavery is not present in our supply chain.

Arctic Wolf does not condone any form of modern slavery (including forced or child labour) and is committed to promoting human rights within the spheres of Arctic Wolf's activities and influence. Arctic Wolf recognizes the right to compensation that meets basic needs, and the importance of maintaining workplaces free of child labour and forced labour. Arctic Wolf is committed to promoting respect for ethical conduct and human rights with third parties with whom Arctic Wolf does business, as well as demonstrating a preference for working with those who share Arctic Wolf's values. Arctic Wolf has implemented and maintains the following internal policies and procedures relevant to the prevention of forced and child labour:

- Code of Conduct and Ethics: This Code includes a commitment to honest and ethical conduct and compliance with law, and no tolerance for the use of child labor, forced labor, or human trafficking in any form.
- Whistleblower Policy: This Policy encourages employees to raise concerns in good faith and provides an avenue for employees to raise any such concerns, along with the assurance that in doing so, they will be protected from retaliation.

These policies are reviewed annually and revised as needed to reflect best practices and evolving regulatory expectations.

4. Due Diligence, Assessment and Management

Arctic Wolf uses a risk-based approach to assess and manage its risk of forced labour and child labour. We utilize Descartes' Visual Compliance, a third party trade compliance tool, to screen its partners, resellers, and suppliers in order to identify high-risk geographies and suppliers. Material purchases of indirect goods are primarily made with in country, major, established suppliers and in compliance with applicable law(s).

Arctic Wolf does not generally utilize subcontractors or third parties in its operations. Further, Arctic Wolf limits its risk of engaging forced labour or child labour by complying with Arctic Wolf's established hiring and human resource policies, practices and procedures. Contractual terms with its hardware manufacturer, require that the manufacturer comply with all laws, rules and regulations. The manufacturer is committed to fairly compensating its employees, providing wages and benefits that comply with applicable law, and ensuring its subcontractors supplying goods or materials behave in the same manner. Further, the manufacturer has contractually agreed that it will not source, use or embed components "produced through convict labor, forced labor or indentured labor under penal sanctions".

Arctic Wolf is not aware of any evidence of instances of forced labour or child labour in its activities or supply chains. Arctic Wolf has not established formal procedures to





assess the effectiveness of its efforts to prevent and reduce risks of forced labour and child labour, but continues to monitor developments and best practices in this area.

5. Reporting and Non-Retaliation

In accordance with our Code of Conduct, non-retaliation and Whistleblower Policy, Arctic Wolf encourages employees to raise concerns in good faith, and provides multiple avenues for employees to raise any such concerns with the assurance that in doing so, they will be protected from retaliation. Employees can report any concerns:

- legal department team members;
- to colleagues, including supervisors, human resources representatives, and
- to Arctic Wolf’s Chief Legal Officer, by email or phone;
- via email to compliance@arcticwolf.com; or
- to Arctic Wolf Ethics and Compliance portal or hotline.

6. Approval and Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9), and in particular section 11 thereof, I, in the capacity of Director of Arctic Wolf Networks Canada, Inc., attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

DS
AS

Full Name: Lisa Tetrault
Title: Director, Arctic Wolf Canada
Signature: DocuSigned by:
Lisa Tetrault

I have authority to bind Arctic Wolf Networks Canada, Inc.

Date: 5/28/2026

