

Modern Slavery Statement

Last Updated: June 29, 2026

Introduction

Arctic Wolf Networks, Inc. ("Arctic Wolf" or "Company"), a leader in cybersecurity, is dedicated to its mission to end cyber risk by providing organizations with comprehensive security operations solutions to mitigate security risks and improve their security posture. As the Company works relentlessly toward this goal for our customers, we remain committed to conducting business responsibly, ethically, lawfully and sustainably, in a manner that sustains and protects our environment and our planet. We believe that transparency builds trust and helps us make more progress, and it is in this context that we publish this Modern Slavery Statement. For purposes of this Statement, "modern slavery" includes slavery, servitude, human trafficking, forced labor, and other practices involving the exploitation of individuals for labor or services through coercion, deception, abuse of vulnerability, or threats, consistent with the UK Modern Slavery Act 2015 and the Australian Commonwealth Modern Slavery Act 2018. This statement is submitted on behalf of Arctic Wolf Networks, Inc. and, where required by law, its relevant subsidiaries, with the intent to align with the UK Modern Slavery Act 2015 and the Australian Commonwealth Modern Slavery Act 2018.

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. Accordingly, Arctic Wolf will exercise appropriate discipline for violations of labor standards in relation to modern slavery as set forth in our Code of Conduct and Ethics, up to and including dismissal and/or reporting to regulatory and/or law enforcement agencies.

For clarity, this Statement covers Arctic Wolf's global operations for the financial year ending April 30 and will be reviewed and updated on at least an annual cadence or as laws materially change.

Arctic Wolf maintains and continues to evolve its framework for responsible business practices. We focus on our ethical, legal, and corporate responsibility to understand the risk of modern slavery that may arise in the course of our business. This includes, but is not limited to: (a) providing modern slavery awareness training for employees, including as part of new hire onboarding, and evaluating opportunities to enhance training content and scope, (b) enhancing our Code of Conduct and Ethics principles 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 in ensuring that modern slavery is not present in our supply chain.

Zero Tolerance

Arctic Wolf maintains a zero-tolerance approach to any form of modern slavery, human trafficking, forced or compulsory labor, child labor, indentured servitude, or involuntary prison labor in our operations or value chain. We will take appropriate action for violations of our standards and applicable law, up to and including termination of employment or business relationships and, when warranted, reporting to regulatory and/or law enforcement authorities. This standalone disclosure aligns with prevailing peer practice.

This Statement applies to Arctic Wolf Networks, Inc. and its affiliated entities in the countries in which we operate and is intended to align with applicable modern slavery and human rights requirements in those jurisdictions.

Training Arctic Wolf Employees

Arctic Wolf's employees are located in multiple regions around the world. As part of the program, Arctic Wolf will communicate its stance that modern slavery has no place in our operations or value chain by requiring our employees to understand and abide by the terms of the Code of Conduct and Ethics, which incorporates the Company's prohibition against modern slavery. Our policies and programs aim to raise awareness on these issues, educate employees on how to identify risks, and train them to apply pragmatic business decision-making to prevent, report and/or mitigate suspected violations.

Newly hired employees acknowledge the Code and complete required training; employees also receive periodic refresher training thereafter. Arctic Wolf extends modern slavery awareness guidance to relevant contractors, channel partners, and suppliers through onboarding materials and publicly available resources outlining Arctic Wolf's expectations.

Where required by local law, Arctic Wolf will also provide jurisdiction-specific training or disclosures to ensure compliance with obligations in the countries in which we operate. We make relevant supplier guidance and expectations available through onboarding communications and our public-facing resources, where appropriate.

Our Business, Structure & Supply Chain

Arctic Wolf provides cloud-native cybersecurity operations services and related professional services to customers globally. Our workforce primarily consists of skilled professionals employed directly by Arctic Wolf or engaged as independent contractors.

Arctic Wolf does not typically manufacture or produce physical goods. Our upstream supply chain is concentrated in professional services, information technology and cloud services, office and facility services, event and marketing services, and limited retail/promotional items; our downstream relationships include distributors, resellers, and other partners that support delivery of our services.

Risk Assessment

Based on the nature of our services and supply chain profile, Arctic Wolf currently assesses the risk of modern slavery in our direct operations as low. However, we recognize elevated risk can arise in select categories (e.g., promotional items and other physical goods, facilities, construction, and catering/food services, and certain regional third-party engagements), which can present higher exposure to forced or child labor in upstream tiers.

To address these risks, Arctic Wolf will continue cross-functional collaboration among Procurement, Legal/Compliance, People/HR, and Security to review risk indicators, supplier country-of-origin signals, and adverse media/regulatory watchlist flags. Where risk elevates, we will apply enhanced diligence and monitoring.

Policies

Arctic Wolf's Code of Conduct and Ethics expressly prohibits modern slavery and human trafficking and requires lawful, ethical conduct by all employees, officers, and directors. We maintain internal policies to reflect clearer expectations around working hours, humane working conditions, fair compensation, and non-discrimination.

Arctic Wolf has adopted and will continue to maintain a Code of Conduct that prohibits forced or child labor, requires verification of worker eligibility, mandates compliance with applicable labor and employment laws, and expects suppliers to provide fair wages, safe working conditions, humane treatment, and respect for freedom of association. Compliance with this Code of Conduct are conditions of doing business with Arctic Wolf.

Operations and Supply Chain Due Diligence

Arctic Wolf requires partners to be contractually bound to a “compliance with laws” provision in our partner agreements and will launch an initiative to require its suppliers to do the same. This legally binds such parties to anti-modern slavery provisions as required by applicable law. In addition, we will incorporate anti-modern slavery concepts into our supply chain and sourcing policies and practices. We will also apply risk-based third-party screening (including sanctions/watchlist and adverse media checks) during onboarding and periodically thereafter, with enhanced diligence for higher risk categories or geographies.

Arctic Wolf continues to invest in technologies and improve our business processes to put best practices and controls in place in support of our commitment against modern slavery. We have implemented restricted party screening tools that assist our purchasing and contracting practitioners in identifying third parties who are subject to sanctions, on government watch lists, and/or have associated adverse media findings. This helps us with our good faith compliance and controls efforts to enhance our due diligence practices when selecting partners and suppliers with whom Arctic Wolf will do business. Where Arctic Wolf identifies heightened risk, we may conduct targeted supplier assessments or request certifications/attestations confirming adherence to Arctic Wolf’s Code of Conduct and applicable laws.

Reporting Violations

Arctic Wolf has implemented an independent third-party operated hotline and Code of Conduct and Ethics, both which may be used by individuals worldwide to report, whether on a named or on an anonymous basis, concerns about ethical or compliance issues or any alleged or actual violations of laws, regulations, policies, or codes of conduct that apply to the Company. This “whistleblower” tool also enables the Company to receive reports of potential violations, investigate incidents, document the reported activity, and allow for escalation and course correction in the event that the alleged violation is found to be legitimate. All reports received through the hotline or portal are taken seriously, maintained confidential to the extent permitted by law, and fully investigated through to case closure by our Legal Compliance and Human Resources departments at the direction of our Chief Legal Officer/Chief People Officer. Arctic Wolf prohibits retaliation against any individual who, in good faith, raises a concern or participates in an investigation; retaliation is a violation of Company policy and will result in disciplinary action.

These reporting channels are available to employees and third parties associated with Arctic Wolf’s global operations, including those of its subsidiaries. *Reporting options will be clearly described in training and policy materials and accessible from Arctic Wolf’s public website.*

Social Impact

Arctic Wolf is committed to responsible business practices, including caring for our communities, and fostering a values driven culture. As part of our commitment, we will continue integrating human rights considerations into supplier engagement, encouraging responsible practices across our ecosystem, and using our influence to drive positive outcomes in our communities.

Program Goals - Looking Ahead

Arctic Wolf continues to review due diligence strategies and monitoring efforts to address modern slavery topics, implement best practices in the marketplace, and understand how to further strengthen our commitments to responsible and ethical business practices.

In comparison to other similar businesses in the sector, Arctic Wolf believes that the risk of modern slavery in our supply chain is low. However, we will endeavor to undertake enterprise risk audits on an

ongoing basis to confirm our true risk level and create cadence to frequently review how we can assess our effectiveness as well as improve and evolve our business in response to a global changing ecosystem and market. Arctic Wolf intends to develop objective performance indicators over time, such as training completion rates, supplier risk categorization metrics, number and resolution of reported concerns, and enhanced due diligence activities conducted in higher-risk categories. We will also monitor evolving international regulatory developments (including the UK Modern Slavery Act 2015 and Australian Commonwealth Modern Slavery Act 2018) and adjust our program accordingly.

Conclusion

The actions that Arctic Wolf takes to reduce the risk of modern slavery in its operations and value chains are driven by our due diligence and monitoring strategy and are operationalized through the processes that we have put in place thus far. We are committed to doing business ethically and legally, and we seek to leverage our buying power to advance human rights as we expand our business to a global scale. Arctic Wolf will report on progress and continue to enhance controls as our program matures.

Approval

This Statement has been approved by an authorized officer of Arctic Wolf Networks, Inc. and, where required by law, by the directors of any Arctic Wolf subsidiary obligated to publish a modern slavery statement (e.g., in the UK or Australia). The approving officer(s) confirm that, to the best of their knowledge, the contents are accurate and have been reviewed through appropriate governance channels.

Approved by: ^{Signed by:} 
 Signature: 62BF24D4ED7C449...
 Name: Aaron Boynton
 Title: Director, Arctic Wolf Networks UK LTD
 Date approved: 7/1/2026

Policy Revision History:

| Date | Version | Status | Prepared By | Comments |
|------------|---------|--------|------------------------------|---|
| 12/22/2022 | 1.0 | Final | Director of Legal Compliance | New Document |
| 10/04/2023 | 2.0 | Final | Director of Legal Compliance | Updated to align with Annual Security Compliance Training |
| 10/12/2023 | 3.0 | Final | HR Compliance Manager | Updated to align with Onboarding training |
| 6/29/2026 | 4.0 | Final | Director of Compliance | Updated to align with globalization |