

Coalfire's Modern Slavery Statement

Effective Date: June 1, 2026

Introduction

This Statement relates to the fiscal year ended December 31, 2025 and describes the activities of Coalfire Systems, Inc. and its subsidiaries ("Coalfire," "the Company," "we," "us" and "our") to address slavery and human trafficking in our business and supply chains. Not all the entities in our consolidated group are subject to the California Transparency in Supply Chains Act, UK Modern Slavery Act, and the Australia Modern Slavery Act. We have prepared this Modern Slavery Statement ("Statement") on a consolidated basis for the entire Company because we have common policies and compliance programs relating to slavery and anti-human trafficking across our business.

Coalfire references "modern slavery" in this statement to include slavery, servitude, forms of child labor, forced labor, human trafficking, debt bondage, slavery-like practices (such as forced marriage), deceptive recruiting for labor or services, as well as violation of other human rights as defined under applicable laws.

Coalfire is committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting ethical operations.

Consultation with Entities Owned or Controlled by Coalfire

To prepare this statement, Coalfire engaged with the reporting entities covered by this statement, consulted the entities it owned or controlled, and other stakeholders. A collaborative approach is undertaken in combating any modern slavery risks with engagement from senior management downwards through owned and controlled entities, with risks remediated through policies, education, and compliance activities.

Coalfire's Organizational Structure and Operations

Coalfire Systems, Inc. is a wholly owned subsidiary of Anthracite Buyer, Inc., a Delaware corporation, and our ultimate beneficial owner is Anthracite Topco, Inc., a Delaware corporation. Coalfire is a global company headquartered in Illinois, United States. In the UK, Coalfire operates through Coalfire Systems Limited. Coalfire has five subsidiaries, the majority of which are located in the United States. Coalfire has over 800 employees worldwide.

Coalfire is a global services and solutions company that specializes in cyber advisory, assessment, and security. The company also develops cutting-edge technology platforms that automate defenses against security threats for the world's leading enterprises, cloud providers, and SaaS companies. Coalfire is the foremost provider of FedRAMP compliance assessments and penetration testing services in the United States. For more information, visit www.coalfire.com.

Coalfire's Supply Chain

Coalfire works with a range of active third-party suppliers, which are primarily located in the United States, the United Kingdom, Argentina, and India. Due to the nature of our business and our supplier selection and onboarding procedures, to our knowledge, there is no exposure to modern slavery in our business or supply chain. We undertake appropriate due diligence, establish relationships of trust and integrity with our suppliers, and enter into contracts to provide contractual commitments by the companies involved.

Our major suppliers typically fall into the following categories:

- **Technology Infrastructure:** Hosting services providers and other SaaS providers who host and process our data and our clients' data in our SaaS offerings.
- **Third-Party Consultants:** Including subcontractors, engaged for various professional services such as accounting, legal counsel, IT applications, security, and other professional services.
- **Facilities:** Including leases and short-term rental spaces for our employees.

Coalfire's Policy Framework

Despite our assessment that the Modern Slavery risk in our operations and supply chains is low, Coalfire has a robust policy framework to ensure there is no Modern Slavery in our supply chains or any part of our business. Our Code of Conduct and related policies are accessible on Coalfire's intranet site, SPARK.

- **Code of Conduct:** This reflects our commitment to ethical and integral business relationships, enforcing systems and controls to prevent slavery and human trafficking in our supply chains.
- **Human Trafficking Policy:** Incorporated into the Employee Handbook, this policy prohibits all forms of modern slavery, including human trafficking.
- **Whistleblower & Investigations Policy:** Reviewed annually and last updated in April 2026, this policy encourages reporting suspected breaches of the Code of Conduct or any policy, including the Human Trafficking Policy. It offers protection against victimization for those who report potential breaches, with reports being made through various channels, including the CoalCares hotline.


Training and Awareness

Coalfire provides training during onboarding and annual refresher training to all employees and management to ensure they are knowledgeable about supply chain issues, including human trafficking and slavery. This training covers our Code of Conduct, emphasizing compliance with all applicable laws and regulations and adherence to the highest ethical standards. Additionally, it encourages employees to take action to correct or prevent any improper activities.


Reporting Concerns

Coalfire's Whistleblower & Investigations Policy empowers employees and contractors to report concerns confidentially and without fear of retaliation. Our internal ethics hotline, CoalCares, enables the reporting of issues related to modern slavery, human trafficking, and other matters. Reports can be made anonymously, reflecting Coalfire's proactive culture in preventing problems.


There are several methods for raising concerns:




Online: Coalfire.EthicsPoint.com



Email: Compliance@Coalfire.com



Phone: U.S. 844-715-9351
or
U.K. 0-808-196-5705



Mail: Attn: Compliance Department
Coalfire Systems, Inc.
330 N Wabash Ave, Suite 1430
Chicago, IL, 60611
United States of America

In FY25, no complaints or concerns related to modern slavery or human trafficking were reported.

Measuring Our Effectiveness in Combating Modern Slavery

We use the following metrics to measure our effectiveness in combating the risk of modern slavery and human trafficking in our business and supply chains:

- Number of whistleblower complaints
- Number of high-risk countries where we have employees
- Number of high-risk countries where we have suppliers
- Percentage of employees who have completed Code of Conduct and targeted human rights training

Monitoring the ethics hotline for any potential instances of modern slavery is one of the ways we assess our effectiveness annually. In FY25, no complaints or concerns related to modern slavery or human trafficking were reported to our ethics hotline. Our Codes of Conduct and employee training programs help us engage with stakeholders, raise awareness, and continually improve our efforts in combating the risk of modern slavery and human trafficking in our organization and supply chain.

ACTIONS TAKEN IN FY25

During FY25, Coalfire took the following steps to strengthen its modern slavery safeguards:

- We delivered our annual Code of Conduct and human trafficking training to all employees during the reporting period.
- We conducted annual reviews of our significant suppliers' modern slavery programs as part of our ongoing supply chain due diligence.

- We continued to monitor the CoalCares ethics hotline throughout the reporting period, with no modern slavery or human trafficking concerns reported.
- We reviewed and updated this Modern Slavery Statement to reflect evolving legislative developments in the jurisdictions where we operate.

LOOKING AHEAD

In the coming financial year, we will:

- Increase employee awareness of our human rights strategy
- Update our personnel training programs in line with best practices
- Take proactive steps to ensure our operations and supply chains remain free from modern slavery
- Integrate these expectations into our standard business processes

This statement reflects Coalfire Systems, Inc.'s voluntary commitment to ethical business practices and was approved by Coalfire Management on June 1, 2026.