

Anti-Trafficking & Slavery Public Policy Statement



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1. Purpose

Cognyte Software Ltd. (hereinafter "Cognyte") is committed to a work environment that is free from human trafficking and slavery, which for purposes of this public policy statement (hereinafter

"Policy"), includes forced labor and unlawful child labor.

Under the United Nations Convention against Transnational Organized Crime and the Protocols

Thereto (2004), human trafficking is defined as "the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Exploitation shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs".

The International Labor Organization's Convention Concerning Forced or Compulsory Labor (1930) Defines forced labor as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily".

Such standards are common and exist in other jurisdictions, including, inter alia, the UK Modern Slavery Act of 2015.

Cognyte will not tolerate or condone human trafficking or slavery in any part of the organization and group.

Cognyte employees, contractors, subcontractors, vendors, suppliers, partners, agents, subsidiaries under its control and others through whom Cognyte conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

References to "law" or "applicable law", throughout this Policy, address the local law of the country of relevant business activity or employment and any other applicable law.

2. Scope

This Policy applies to all personnel employed by or engaged to provide services to Cognyte, including, but not limited to, Cognyte's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees").

Every Cognyte employee is responsible for complying with this Policy.

Should an employee have any question or concern relating to this Policy, he/she may freely and directly consult with Cognyte's Legal Department or Head of InfoSec Risk & Compliance. Any employee who learns of any conduct that he/she believes may violate this Policy, should report it immediately via the Cognyte [Ethics Hotline](#) on the company website or directly to the Cognyte Legal Department or Head of InfoSec Risk & Compliance.

3. Policy Statement

Cognyte prohibits trafficking in persons and slavery. Cognyte employees, contractors, subcontractors, vendors, suppliers, subsidiaries under its control, partners and others through whom Cognyte conducts business must not engage in any practice that constitutes trafficking in persons or slavery.

his includes, but is not limited to, the following activities:

- Engaging in any form of human trafficking;
- Procuring commercial sex acts in relation to Cognyte or made for or on behalf of Cognyte;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions;
- Failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and key benefits, the location of work and, if applicable to Cognyte or its subcontractors or partners, any significant cost to be charged to the candidate, living conditions and hazardous nature of work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work documents in writing.

Cognyte has undertaken actions and is committed to maintaining and improving its systems and processes, to eradicate human trafficking and slavery in its direct supply chain.

Cognyte requires its direct supply chain suppliers to observe all applicable laws and conduct business ethically and responsibly. Cognyte continues to promote awareness about, and addresses risks associated with forced labor and human trafficking in its direct supply chain.

Accountability standards:

Cognyte upholds accountability standards and procedures for employees and direct supply chain suppliers who fail to meet Cognyte's business conduct requirements. Without derogating the above, contracts between Cognyte and its suppliers shall include a provision that confirms the supplier's commitment to complying with this Policy. Complying with the requirements of 48 CFR 52.222-50: Cognyte requires its subcontractors performing services or delivering supplies under a US Government Prime Contract to accept and conform to the requirements of 48 CFR 52.222-50 Combating Trafficking in Persons and uphold it, if applicable by FAR, as this FAR is incorporated in any applicable subcontract.

4. Policy Compliance

Employees and third parties are required to report any conduct they believe may be a violation of this Policy, either to Cognyte's Legal Department, the Head of Infosec Risk & Compliance or via the [Ethics Hotline](#).

The recipient shall make sure a proper investigation is conducted.

A report may be made anonymously. Employees and third parties who fail to report actual or suspected misconduct may be deemed in violation of this Policy and/or applicable law.

Cognyte will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Cognyte employees, suppliers and relevant third parties are required to fully and promptly cooperate with Cognyte's internal and external auditors and investigators in relation to the implementation of this Policy, and respond fully and truthfully to their questions, requests for information and documents.

A failure to cooperate or an action to hinder an investigation or audit, including, for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, shall be regarded as a violation of this Policy.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in a criminal prosecution of responsible individuals.

In addition, Cognyte will discontinue its relationship with a third party or Supplier who fails to comply with this Policy.

Reporting an alleged violation of this Policy shall be by e-mail to compliance@cognyte.com.