

DAON MODERN SLAVERY STATEMENT

Updated: 24 April 2024

All businesses have a moral responsibility to work towards the eradication of modern slavery from the global economy in so far as touches upon their business. This statement sets forth the steps Daon has taken to understand its modern slavery risks and put in place steps to ensure it is not unknowingly profiting from or contributing to practices that enable illegal labour exploitation.

Our Structure and Business

Daon is a privately-owned software security company specialising in biometric and other forms of identity authentication for mobile devices. Our business is headquartered in Fairfax, Virginia with key group operations based in the Dublin, Ireland, Australia, Serbia and the United Kingdom. We have approximately 232 full time and part-time employees.

Risk Assessment

Daon completed a risk assessment to identify and understand its modern slavery risks, focusing on high-spend areas and key suppliers in the first tier of our supply chain. Expenditures and/or suppliers were then identified as having a low, medium, or high risk of modern slavery based on industry and geographic region of operation. Due diligence was directed at any area presenting a medium or high risks of modern slavery.

As a software development company, the risk of modern slavery within our business and operations is low. We comply with all applicable employment legislation in all the countries where Daon is present relating to employee terms and conditions, including pay, and we invest heavily in supporting the health and wellbeing of our staff. Our workforce is comprised almost exclusively of highly skilled professionals and support staff specialists from low-risk countries of origin. There is zero risk of modern slavery in our direct workforce. We do sometimes outsource a small number of contracted workers from regions where modern slavery risks are medium to high. Such outsourced labour includes sales and pre-sales consultants, offshore software development teams, and marketing/business development experts with expertise in exploratory markets. Due to the low number and high skill level of these contractors, however, as well as contractual assurances of compliance with all applicable labour and employment laws, we consider these risks to be adequately mitigated.

Supply Chains

Daon's physical operations are small, comprising of four offices and their associated equipment and workforce. As a result, Daon also has a small supply chain, consisting primarily of highly-skilled consultants that are not at risk for modern slavery. Our key nonlabour procurement spends are for office leaseholds, IT services, and basic office equipment.

We appreciate that no business is immune from modern slavery, and that it is particularly important for us to monitor the outsourced areas that enable our work such as security, maintenance, and office cleaning. All of Daon's offices are located in countries having a Tier 1 (low risk) rating by the US State Department Trafficking in Persons Report (2017). Cleaning and maintenance of Daon's offices in Dublin, Serbia and the United States are paid for and managed by the respective landlords of those properties.

Policies and Training

As part of its modern slavery due diligence, Daon reviewed its existing Charter of Social Responsibility and Ethics. We restate here our commitment to maintaining the highest standards of employment practices, and that we support and operate our business in line with

the highest moral and ethical standards from around the globe. We respect and obey the laws, rules and regulations applying to our businesses around the world.

Daon does not tolerate modern slavery and human trafficking. Our HR, legal and business operations teams now receive annual modern slavery training and are involved in enforcing this policy and monitoring our supplier and new supplier relationships regularly. Our workforce receives a copy of our modern slavery policy.

Grievances/ Issues

Any grievances, concerns or issues should be promptly brought to the company's attention via the legal or HR departments. They will be dealt with appropriately.

Approved

This statement has been approved by Daon

This statement was approved by Martin Walsh, Chief Legal Counsel on 24 April 2024 and signed by Clive Bourke as Director. It will be reviewed and re-issued on an annual basis and made available on our website.

Signed for and on behalf of Daon

Signed by:



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Clive Bourke
Director