



**ENTRUST**

**GLOBAL MODERN SLAVERY  
ACT STATEMENT**



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## 1. Introduction

Entrust Corporation and its subsidiaries (“Entrust”) are committed to social responsibility across our global operations. We do not permit the exploitation of persons in our operations or our supply chains in any form, including forced, bonded, or indentured labor, slavery, child labor, or trafficking of persons. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems, controls, and remediation measures to ensure modern slavery is not taking place anywhere in our business—directly or indirectly.

## 2. Reporting Entities

This statement is made in accordance with the U.K. Modern Slavery Act of 2015 (“UK Act”), the Australian Modern Slavery Act of 2018 (“Australia Act”), and the Canadians Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023 (“Canada Act”) for the financial year ending March 31, 2024. For purposes of the UK Act, Australia Act, and Canada Act, this joint statement is made on behalf of Entrust Corporation and all applicable reporting entities:

<b>Australia</b>	Datacard Australia Pty. Ltd. Entrust South Pacific Pty. Ltd.
<b>Canada</b>	Entrust Ltd. Affirmtrust Ltd.
<b>United Kingdom</b>	Data Card International Ltd. Entrust (Europe) Ltd. Entrust Security Solutions UK Ltd. nCipher Security Ltd. NuType Ltd.
<b>United States</b>	Entrust Corporation

Entrust’s activities to prevent, detect, and remediate any instances of modern slavery or human trafficking are also guided by the United States Uyghur Forced Labor Prevention Act (“UFLPA”) and the California Transparency in Supply Chains Act (“California Act”), although Entrust is not currently obligated to report under either framework.

Entrust Corporation wholly owns and operates all entities in the table above. All global operations including, but not limited to supply chain activities, manufacturing, compliance and regulatory oversight activities, and global management are centrally structured within Entrust Corporation. All Entrust colleagues, contractors, partners, and suppliers are required to adhere to Entrust’s policies related to modern slavery, and to actively support Entrust’s efforts to prevent, detect, and remediate any instances of actual or perceived acts of modern slavery.



## 3. Structure, Operations, and Supply Chain

### 3.1 Structure and Operations

Entrust supplies secure physical and digital identity solutions to a broad range of customers across the world. Entrust is a privately held corporation incorporated in the State of Delaware, USA. Our headquarters and principal manufacturing center is located in the State of Minnesota, USA. Entrust operates a second, smaller manufacturing location in Axminster, United Kingdom. Together with our global subsidiaries, our organization has approximately 2,900 colleagues worldwide and operates in four key regions: EMEA, APAC, LAC, and North America.

### 3.2 Supply Chain

Entrust seeks supply chain partners with shared values to build a relationship based on ethical business conduct, sustainability, collaboration, and innovation. Our supply chain plays an important role in helping Entrust manage the ethical sourcing and sustainability of our products. Our key supply chain categories include infrastructure providers, suppliers for parts, equipment and software, and operational and professional support service providers.

## 4. Modern Slavery Risks

Entrust recognizes the risk for modern slavery to enter its business operations and supply chain. That level of risk is influenced by factors, including but not limited to, the type of sector for goods or services, supplier location, and evolving risks such as regional conflicts. We recognize that identifying and managing these risks is an ongoing process to sustain our zero-tolerance commitment around modern slavery. Entrust relies on the governance framework described below to prevent, detect, and address any instances of modern slavery.

## 5. Governance Framework: Actions to Assess and Address Risk

### 5.1 Colleague Code of Ethics

At Entrust, our commitment to integrity drives everything we do. Entrust's Code of Ethics (CoE) seeks to ensure integrity and accountability in all business dealings and partnerships globally. Every colleague is responsible for knowing and complying with applicable laws and regulations, as well as the CoE and all related policies. Our CoE is publicly available on our website at the following link: <https://www.entrust.com/legal-compliance/policies/ethics>.

### 5.2 Global Anti-Trafficking and Modern Slavery Policy

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Global Anti-Trafficking and Modern Human Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere in our business. Our policy



is publicly available on our website at the following link: <https://www.entrust.com/legal-compliance/policies/anti-slavery-policy>.

### **5.3 Training, Awareness, and Culture**

A foundational aspect of identifying and addressing modern slavery risk is to create awareness amongst our colleagues through training and communication. Entrust colleagues complete annual training on the Code of Ethics and related policies. This training is mandatory for all colleagues, and they are required to acknowledge their understanding of the CoE and related policies and provide an attestation of their compliance. Training is tracked and monitored to ensure completion and resources are available should colleagues have questions around the standards and expectations for which they are held accountable.

### **5.4 Supplier Code of Ethics**

As part of Entrust's robust supplier due diligence and oversight efforts, supply chain partners must adhere to the Supplier Code of Ethics ("Supplier Code"). The Supplier Code is based on the principles set forth by the Responsible Business Alliance and focuses on four key areas – Labor Practices, Health and Safety, Environment, and Ethics. The principles reflected in the Supplier Code establish the minimum standards that must be met by any supplier that sells goods or services to Entrust as part of our global supply chain. Our Supplier Code is available on our publicly facing website at:

<https://www.entrust.com/-/media/documentation/licensingandagreements/supplier-code-of-ethics.pdf>.

### **5.5 Third Party Due Diligence**

Entrust can be held accountable for the actions of third parties contracted to represent Entrust or otherwise perform services on its behalf. As such, Entrust must understand the qualifications and associations of its third party partners to ensure that it only does business with reputable third parties who act with integrity and deliver quality products and services. Prior to contracting with a third party for goods or services, appropriate due diligence is conducted. As part of our supplier due diligence process, we require suppliers to provide detailed information about their anti-human trafficking and anti-slavery measures. Entrust considers the robustness of a supplier's program when deciding whether to award or renew business with a third party.

### **5.6 Supplier Contracts**

Entrust also has strong contractual language in place with its suppliers that requires them to comply with all applicable laws and regulations including, but not limited to, modern slavery laws and anti-corruption laws where services will be performed. We reserve the right under our supplier agreements to terminate the relationship with a supplier if any evidence of non-compliance is found. We also require compliance with our Supplier Code of Ethics as part of the contracting process.



## 5.7 Conflict Minerals

We are committed to preventing instances of modern slavery and human trafficking through the prohibition of conflict minerals in our supply chain. We have policies, supplier due diligence measures, and contractual obligations in place to support this commitment. To ensure ethical sourcing, suppliers are also required to perform their own conflict minerals due diligence. Entrust's *Global Conflict Minerals Policy Statement* is publicly available on our website at the following link:

<https://www.entrust.com/-/media/documentation/licensingandagreements/conflict-minerals-policy-statement.pdf>.

## 5.8 Risk Assessment

Entrust conducts an annual corporate Enterprise Risk Assessment (ERA) as part of its overall Enterprise Risk Management process. All supply chain risks are captured in the ERA process, including factors that may lead to a higher risk of modern slavery. The responsibility for managing identified risks belongs to the designated risk owner. The ERA risks are reviewed regularly by the Compliance & Risk Committee and the overall assessment results are shared with the Audit Committee of the Board of Directors.

## 5.9 Reporting and Investigations

Entrust colleagues and suppliers must report any policy violations immediately. Concerns involving human rights or other policy violations can be reported to management, Legal, Human Resources or through Entrust's confidential Ethics Hotline. The Ethics Hotline is available 24/7 and allows for confidential, anonymous reporting. The landing page for our hotline can be found at: [www.entrust.ethicspoint.com](http://www.entrust.ethicspoint.com).

All reports are promptly reviewed and investigated in a manner consistent with applicable local law and policy. Confidentiality is maintained throughout the investigation to the extent consistent with conducting an adequate investigation and taking appropriate corrective action, and to the extent consistent with applicable local law and policy. Entrust prohibits retaliation of any kind against anyone who makes a report in good faith.

Entrust did not receive any reports of suspected or actual violations of applicable law or its policies related to modern slavery or child labor in the financial year ending March 31, 2024.



## 6. Assessing Effectiveness

### 6.1 Key Performance Indicators

We use the following key performance indicators (KPIs) to measure how effective we are in preventing modern slavery and human trafficking in our business operations and supply chain:

- The number or percentage of suppliers and sub-contractors that have been vetted for ethical labor practices.
- The number of reports of ethical concerns or suspected policy violations entered in our case management system.
- The number of reported ethical concerns requiring action after investigation.

## 7. A Focus on the Future

Entrust continues to enhance its program, including its third-party due diligence and risk assessment processes, to ensure modern slavery has no presence in its operations or supply chain.

## 8. Authorization and Approval

This statement was approved by the Board of Entrust Corporation at its regular meeting in March 2024. The statement is signed by the below parties on behalf of Entrust Corporation and its wholly owned subsidiaries and as authorized representatives of Entrust and Entrust's Board of Directors.

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*Todd Wilkinson*

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**Todd Wilkinson**

**Entrust President and CEO**

**March 6, 2024**

DocuSigned by:

*Siddharth Mehta*

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**Siddharth Mehta**

**Entrust Chairman of the Board**

**March 6, 2024**