



# ENTRUST

## GLOBAL ANTI-TRAFFICKING AND MODERN HUMAN SLAVERY POLICY

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## 1. Introduction

Entrust Corporation (the “Company”) has a zero-tolerance approach to human trafficking and modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chain.

## 2. Purpose

Human trafficking and modern slavery are serious human rights challenges that afflict vulnerable groups on a global scale. This policy is designed to communicate and ensure Entrust’s zero-tolerance approach to human trafficking and modern slavery.

## 3. Policy Requirements

Entrust is a supplier of secure physical and digital identity solutions. Entrust Corporation has its headquarters in Minnesota, USA. Together with its global subsidiaries and affiliates (referred to herein as “Entrust” or the “Company”), the organization has over 3,000 colleagues worldwide and operates in four key regions: EMEA, APAC, LATAM, and North America.

This policy applies to all colleagues of Entrust entities worldwide to the extent consistent with applicable local legal requirements, policy, business need, and practice. To the extent there is any conflict between this policy and any local policy, the local policy shall prevail.

## 4. Policy

Body text It is Entrust’s policy to oppose human trafficking and modern slavery vigorously. Accordingly, the Company is undertaking steps including the following:

- The Company does not and will never tolerate human trafficking or modern slavery in any aspect of its own work.
- The Company will collaborate with other organizations, as needed, to present a united front against human trafficking and modern slavery in its broader working environment.
- The Company will support colleagues, as needed, to be aware of the risks of human trafficking and modern slavery, and to act appropriately when any such risk is detected, including by providing appropriate training on this policy and its requirements, pursuant to applicable legal requirements and local practices.
- The Company will endeavor to include provisions in supplier contracts to similarly prohibit the use of forced, compulsory, or trafficked labor, and expects that its suppliers will hold their own suppliers to the same high standards.

- The Company may terminate its relationship with individuals or organizations who do not comply with this policy, subject to applicable legal requirements.

## 4.1 Definitions

**Human trafficking:** Arranging or facilitating the travel of another person so that person may be exploited. It is irrelevant whether or not that person has consented to travel. The exploitation need not actually have taken place.

**Exploitation:** Slavery, servitude or forced or compulsory labor; sexual exploitation, in particular but not limited to prostitution and sexual offences involving children; the removal of organs, otherwise than as properly approved by relevant authorities; securing services or other benefits/advantage by force, threats or deception; and securing services from children or anyone who is mentally or physically ill or disabled, where it is reasonable to expect that someone without the relevant vulnerability would have refused.

**Modern Slavery Legislation:** All applicable laws related to the prevention of slavery, including but not limited to the United Kingdom's Modern Slavery Act of 2015, Australia's Modern Slavery Act of 2018, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023.

## 4.2 Responsibility

The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chain is the responsibility of all colleagues.

- It is the responsibility of Entrust to ensure implementation of this policy and any related local policies in all applicable locations.
- It is the responsibility of managers at all levels to ensure that those reporting to them understand and comply with this policy and any related local policy.
- Colleagues are expected to help Entrust provide a workplace that is free from any violations of this policy. It is therefore the responsibility of each colleague to promptly raise any concerns about a violation or possible violation of this policy and/or any related local policy.

## 4.3 Reporting an Incident

Incidents involving possible violations of this policy must be reported immediately. The colleague may choose first to report the incident to the colleague's immediate supervisor or next level manager. Supervisors and managers are required to report all such incidents to Human Resources.

If for any reason the colleague is unable or reluctant to report the incident to supervisory personnel, the colleague should report the incident to the Business Unit Human Resources Business Partner. In addition, colleagues have the option to report concerns anonymously through the Ethics Hotline, which is available at [entrust.ethicspoint.com](https://entrust.ethicspoint.com). Additional information on the Ethics Hotline can be found in the Code of Ethics and on the Entrust Compliance webpage.

Any report of a possible violation of this policy will be investigated in a manner consistent with applicable local law and policy and appropriate to the nature of the reported violation. Confidentiality will be 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. The Company encourages openness and will support anyone who raises a genuine concern in good faith under this policy, even if it turns out to be mistaken.

**Retaliation against an individual for reporting possible violations is strictly prohibited and will be subject to disciplinary action, up to and including termination.**

## 5. Exceptions

There are no exceptions to this policy.

## 6. Ownership and Review

This policy is owned by the VP, Compliance, who is responsible for ensuring Company-wide compliance with this policy. It will be reviewed on an annual basis in accordance with the Global Policy on Creation and Administration of Global Policies and pursuant to any applicable requirements under the Modern Slavery Legislation.

## Ownership and Revision History

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Document Approvals		
Approver Name	Title	Date
Beth Klehr	Chief Human Resources Officer	24-Apr-2023
Jessica Edwards	Corporate Counsel	24-Apr-2023
Work Councils	Work Councils	11-May-2023
Policy Governance Board	Policy Governance Board	11-May-2023

Revision History & Next Scheduled Review			
Version	Date	Description of Changes	Revised By
1.0	29-Jan-2018	Initial ISO Version	Emily Ehlebracht
1.1	29-Jan-2020	Policy was updated into new format; minor changes added in Section 4	Christine Blessing/Tom Finn
1.2	10-Jun-2020	Additional legal review, revisions to incorporate requirements for UK	Anjali Doherty
1.3	10-Sept-2020	Update into new policy template	Aileen Havel
1.4	28-Dec-2020	Added definition of Modern Slavery Legislation	Aileen Havel
1.5	24-Apr-2023	Placed in new policy template and minor updates	Christine Blessing, Director HR
1.6	02-Feb-2024	Added Canada's Modern Slavery Act and minor updates.	Andrew Thomas
1.7	01-May-2025	Updated global colleague population; minor updates to dates	Andrew Thomas
<b>Next Scheduled Review:</b>		2026	