

Modern Slavery and Human Trafficking Statement

Financial Year 20/21

This Modern Slavery and Human Trafficking Statement (the "Statement") has been published in accordance with section 54 of the Modern Slavery Act 2015 (the "Act"). It outlines the measures that Utimaco¹ ("Utimaco" or "we") has taken to ensure that no slavery or human trafficking is present in its business or supply chains.

Introduction

We recognize that slavery and human trafficking can occur in many forms, such as forced labor, child labor, domestic servitude, sex trafficking and workplace abuse and it can include the restriction of a person's freedom of movement whether that be physical, non-physical or, for example, by the withholding of a worker's identity papers. We are committed to ensuring that neither we, nor any constituent part of our supply chain, are involved in slavery, servitude, forced labor or human trafficking. This Statement is in respect of Utimaco's financial year 20/21 which ends on 31 March 2021 and was approved by Utimaco's Management Board on 18.08.2020.

Utimaco's organizational structure

Utimaco is an international provider of cyber security solutions with headquarters in Aachen (Germany) and Campbell (USA). Our core business consists of two segments: The manufacturing of hardware-based, high-security appliances ("Hardware Security Modules" or "HSMs") and the developing of compliance solutions for telecommunication provider regulations ("Lawful Interception Management Systems" or "LIMS").

Our HSM business is performed by Utimaco IS GmbH (Germany), Utimaco IS Pte. Ltd. (Singapore) and Utimaco Inc. (USA). An HSM is a dedicated, tamper proof solution, combining software and hardware, that generates, manages and stores encryption keys to secure digital identities. We provide HSMs to all industries, from financial services and payment to the automotive industry, cloud services to the public sector.

Our LIMS business is performed by Utimaco TS GmbH (Germany), Utimaco TS Srl (Italy) and Utimaco TS UK Ltd. (United Kingdom). A LIMS helps network operators comply with regulation which requires operators to be able to intercept communication upon authorized request. It allows the real time interception of communication sent through any kind of communication network (e.g. fixed lines, mobile lines, internet service providers).

With entities in Germany, USA, Singapore, Italy and United Kingdom, Utimaco operates globally and employs approximately 320 employees.

¹ Utimaco collectively refers to Utimaco Management GmbH, Utimaco GmbH, Utimaco IS GmbH, Utimaco IS Pte. Ltd., Utimaco Inc., Utimaco TS GmbH, Utimaco TS Srl, Utimaco TS UK Ltd. and Geobridge Corp.

Utimaco's Supply Chain

Given the diverse nature of our business, we have third party product suppliers and service providers ("Business Partners") throughout the world who supply goods and services to Utimaco for the different business segments described above.

We only use professionally qualified Business Partners mostly based in low risk areas (such as USA, EU). When we admit a Business Partner to our supply or service network, a thorough due diligence process happens to ensure that the Business Partner has a good reputation with appropriate practices in a number of areas including people and culture. Once admitted to our network, compliance with our policies is a condition of membership and will be part of the relevant contract.

Please see further details below on both the policies and due diligence processes that apply to our Business Partners which help ensure they are appropriate business partners for Utimaco.

Our policies in relation to Slavery and Human Trafficking

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

Our Business Ethics including the Anti-bribery and Anti-corruption Code of Conduct and the Labor Practice & Human Rights Declaration of Commitment ("Business Ethics") set out our expectations of how we work, the standards for collaborating with Business Partners and other contractual partners and the common basis on which to build contractual relationships.

Our Business Ethics are also published on Utimaco's website:
<https://www.utimaco.com/company/business-ethics/>

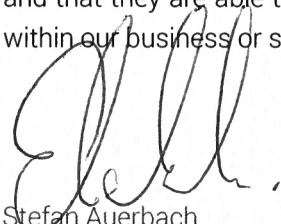
Due Diligence and Risk Assessment

Before we enter into any business relationship with a potential Business Partner, every new Business Partner will be ranked according to various risk factors, such as category, financial and geographical risk, allowing Utimaco to conduct risk-based due diligence.

According to the risk rank we undertake a due diligence process to check international databases and information systems, external databases as well as conducting more generalized internet searches to see whether any misconduct is known in relation to our Business Ethics. The outcome of the risk assessment will be documented in our database.

Training

All of Utimaco's employees are required to complete an annually compliance training in regard of our Business Ethics, including slavery and human trafficking, which also takes into account recent regulatory developments. The training ensures that our employees are aware of our Business Ethics and that they are able to raise concerns about how colleagues are being treated, or about practices within our business or supply chains, without fear of reprisals.



Stefan Auerbach
CEO



Martin Stamm
CFO