



Modern Slavery Statement for Financial Year

2023

CYBERSPACE B.V.



Introduction

The cybersecurity industry plays a crucial role in ensuring the integrity and security of digital ecosystems. At Nord Security Group and its subsidiaries, we recognize the importance of ethical practices and social responsibility in our operations. We are committed to upholding the highest standards of integrity and transparency, including our efforts to combat modern slavery in all its forms.

Reporting Entities

This statement on modern slavery and human trafficking is published on behalf of CYBERSPACE B.V. and its subsidiaries, including but not limited to CyberCare, UAB, Nord Security Inc., Nordvpn S.A., Peakstar Technologies Inc., pursuant to section 54(1) of the UK Modern Slavery Act 2015 and section 13 of the Australian Modern Slavery Act 2018. References to “we”, “us”, “our”, and “Nord Group” collectively refer to these companies. This statement applies to the financial year ending 31 December 2023. CYBERSPACE B.V., as the holding company, sets the approach and policy for mitigating modern slavery-related risks across all subsidiaries.

Our Business

The web has become a chaotic space where safety and trust have been compromised by cybercrime and threats to data privacy. Therefore, Nord Group has a global mission to shape a more trusted and peaceful online future for people all around the world.

Nord Group provides advanced digital security and privacy solutions for individuals and businesses, including NordVPN - a virtual private network, which provides secure and private connection to the internet, password manager NordPass, advanced network access security solution NordLayer, and encrypted cloud storage solution NordLocker.

Our Supply Chain

Nord Group's business model relies on a robust server infrastructure supported by various upstream entities, including server providers, data centers, internet service providers, and cloud computing service providers. Additionally, Nord Group's distribution and promotion channels consist of downstream entities such as distributors, resellers, affiliates, and influencers. Nord Group strives to ensure that it only works with vendors that conduct themselves with integrity and in compliance with all applicable laws and regulations. The global nature of our operations means that our supply chain spans many markets worldwide. Whilst Nord Group operates in an industry where the risk of modern slavery and human trafficking is generally considered to be low, we recognise the inherent risks that can exist within supply chains, particularly in regions with limited modern slavery and human trafficking regulations in place.

Policies and Reporting Channels

Nord Group has adopted comprehensive policies and procedures aimed at fostering ethical and transparent business operations, which also encompass the mitigation of risks associated with slavery or human trafficking within our business and supply chain. These policies outline clear expectations and guidelines for ethical conduct.

Policy	Summary
Anti-Bribery and Anti-Corruption Policy	Outlines Nord Group’s main anti-bribery and anti-corruption principles, specific compliance requirements, and states Nord Group’s commitment to conduct business globally with the highest level of honesty and integrity
Whistle-Blower Protection Policy	Defines the procedure of issuing and handling whistle-blower reports about criminal acts, administrative misconduct, breaches of work duties, and any serious violation of professional ethics norms, legal acts and/or internal rules. It establishes the main principles of whistle-blower protection, and describes the means of its implementation
Prevention of Violence and Harassment at Work Policy and Anti-Harassment and Anti-Discrimination Policy	Establishes guidelines to create a safe and respectful work environment by preventing and addressing incidents of violence and harassment with reporting procedures and training
Anti-Money Laundering and Trade Compliance Policy (implemented through relevant procedures, such as Vendor risk management procedure)	Establishes clear obligations for preventing money laundering, terrorist financing, sanctions violations, export control breaches, and tax evasion, as well as reducing associated risks within Nord Group’s business operations and service provision

Nord Group provides multiple dedicated reporting channels for employees to report suspected non-compliance with these policies or raise any related concerns, including a specific form for reporting modern slavery-related concerns. Any concerns and suspicions are handled and, when required, escalated by its Risk Team, Legal Department, or Human Resources department, as may be appropriate.

Since 2019, Nord Group has prepared yearly overviews to keep all interested parties informed about its corporate governance practices and demonstrating its commitment to operational transparency and accountability. All reports are available on our website (<https://nordsecurity.com/corporate-responsibility>). To further sustain these efforts, Nord Security prepared a Code of Conduct that encompasses corresponding commitments. The Code will be formally adopted in 2024.

Risk Assessment, Prevention and Mitigation

Nord Group is aware that the most important step we can take to protect ourselves and others is to carefully select and evaluate all third parties we do business with. Nord Group employees must support the due diligence and assessment of third parties during their onboarding and ongoing business relations. This is essential to ensuring that these parties adhere to the various legal, compliance, and ethical regulations and standards we uphold. Nord Group is not aware of any actual or alleged modern slavery or related criminal incidents within its operations or supply chain and continues active monitoring. Risk mitigation processes for relevant crimes are performed within all applicable business operations, such as various marketing channels, indirect sales, outsourcing, etc., and according to all best practices.

A risk-based approach is at the heart of Nord Group's compliance policies, procedures and controls. The company focuses its resources on the areas of greatest risk which are identified during annual company-wide risk assessments.

Nord Group is committed to minimizing the risk of modern slavery within its supply and distribution chains by performing thorough due diligence. We use a dedicated third-party tool for sanction, enforcement, and adverse media screenings, including modern slavery-related activities, on our vendors, suppliers, marketing partners, and other counterparties. This screening, provided by a global leader in compliance and risk management services, sources information from credible news outlets, government agencies, industry regulators, and other reliable entities. Negative information that may indicate potential modern slavery is identified and reviewed daily by experienced risk managers. Additionally, our key vendors and suppliers undergo detailed risk assessments, where we engage directly with them to gather further information on their modern slavery controls.

Training and Working Conditions

Nord Group's total global workforce as of December 2023 was 2017 full-time and part-time employees representing 64 nationalities. Once a year, Nord Group conducts annual market research to ensure that wages are competitive in the market. Nord Group suggests flexible working hours and provides paid days off for sickness and other occasions.

Employee well-being is one Nord Group's main priorities. To support employees, Nord Group offers private health insurance that covers 25 psychological counseling sessions per year for each employee, and offers company-paid subscriptions to a range of psychological health apps. Additionally, Nord Group is mindful of its employees' physical health, providing private fitness club memberships and live or online training sessions guided by physical well-being consultants.

Employees at Nord Group must regularly complete mandatory training on compliance, risk and security, data protection and privacy, and other relevant topics, including modern slavery. The training materials are updated periodically to reflect the changing environment. Nord Group also encourages growth and learning through external and internal training, mentoring programs, and knowledge sharing sessions. In 2023, Nord Group employees spent 27 838 hours in training.

Statement Approval

This statement has been approved by the Board of CYBERSPACE B.V. on behalf of itself and its relevant subsidiaries. It applies to all Nord Group entities, and will be reviewed every year.