

# Modern Slavery and Human Trafficking Statement

Financial Year 22/23

# 1 Imprint

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## 2 Preamble

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 Utimaco<sup>1</sup> (“Utimaco” or “we”) has taken to ensure that no slavery or human trafficking is present in its business or supply chains.

## 3 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 22/23 which ended on 31 March 2023 and was approved by Utimaco’s Management Board on the signature date.

## 4 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. We also provide Trust as a Service to our customers across industries. Trust as a Service is Utimaco’s self-service platform that empowers you to manage your cybersecurity needs online and flexibly.

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).

Through recent acquisitions we expanded our product and service portfolio and became a global leader of Public Warning Systems (PWS), Mass Notification Systems and the world largest CBC (Cell Broadcast Center) provider. Another acquisition helped to expand our product offering in the area of reliable data protection for compliance and prevention of data and security breaches.

In addition, Utimaco professional services provide tailor-made advice and solutions to support our partners with solution consulting and to translate customer requirements into technical architectures. This can be the basis for individual project implementations and the development of additional cryptographic functionality and HSM firmware.

With entities in Germany, Italy, United Kingdom, Spain, USA, Mexico, Israel, India, Singapore, and Japan Utimaco operates globally and employs approximately 550+ employees.

## 5 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.

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<sup>1</sup> Utimaco collectively refers to Utimaco Management Services GmbH, Management GmbH, Utimaco GmbH, Utimaco IS GmbH, Utimaco IS Pte. Ltd., Utimaco Inc., Utimaco TS GmbH, Utimaco TS Srl, Utimaco TS UK Ltd., MYHSM Ltd., Realia Technologies, S.L., Realsec Technologies, S.A. de C.V., Utimaco Technologies Ltd., Utimaco Technologies Private Limited, Celltick Technologies Singapore PTE Ltd and Utimaco Japan GK.

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 several 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.

## 5.1 Policies in Relation to Slavery and Human Trafficking

We operate several 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 [here](#).

## 5.2 Due Diligence and Risk Assessment

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

Our due diligence process includes inter alia more generalized internet searches to see whether any misconduct is known in relation to our Business Ethics.

# 6 Awareness

Utimaco ensures that our employees are aware of our compliance obligations in regard of our Business Ethics including slavery and human trafficking, and recent regulatory developments through training and other suitable means. We also ensure that all our employees are able to raise concerns about how colleagues are being treated, or about practices within our business or supply chains, without fear of adverse treatments.

## 7 Acknowledgement and Signature

Aachen, May 22, 2023

DocuSigned by:  
  
F814BF080CA2415...  
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(Chief Financial Officer)

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