

Modern Slavery Act Transparency Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken to minimize the risk of modern slavery and human trafficking in our business and supply chains, as cBrain recognizes the importance of identifying and preventing modern slavery.

Business model and supply chain

cBrain was founded in 2002 and is a software vendor dedicated the public sector. cBrain is a one product company and has developed the standard platform F2 for government entities supporting all kinds of business processes based on configuration. F2 is deployed across 5 continents, cBrain implements and powers business critical processes via F2.

cBrain's headquarters is in Copenhagen, Denmark and has staff in Germany, UAE, Australia, Kenya and USA.

In the latest strategy cBrain is preparing a "F2 for Partners" approach, where partners via F2 Service Builder are enabled to configure F2 solutions. Partners are selected thoroughly via a due diligence process. Upstream cBrain uses few selected suppliers for hardware, operations and software tools mainly located in US, Denmark and UK.

Approach

cBrain's foundation is strong, ethical and humanitarian values that reflect the culture of the Nordic countries. We are committed to ensure that there is no modern slavery or human trafficking in any part of our business or supply chains. We act ethically and with integrity in all our business relationships and through due diligence processes, sound management judgement, our code of conduct and our code of suppliers and contractual terms, we ensure that our suppliers uphold the same obligations and high standards so as to prevent modern slavery and human trafficking anywhere in our supply chain.

All our services are underpinned by ISO27001:2022 and ISO 14001:2015 certified processes.

Policies

cBrain has implemented a set of policies and procedures together with training facilities that ensure that all employees are educated and trained in the cBrain culture and mindset and in according with the UN's 10 Principles and comprises:

The cBrain Code of Conduct which is the general foundation for how we conduct our business ethically and how we treat people whether employees, suppliers, customers or the end users. The Code of Conduct address themes like adherence to laws and regulations, support of the UNs 10 Principles in both letter and spirit, equality, anti-bribery and anti-corruption, zero tolerance of harassment and discrimination. All staff are trained in the Code of Conduct as a part of the onboarding process and are retrained once a year and reported in our annual CSR report. Likewise, suppliers are required to sign up for our Code of Suppliers that reflects cBrain's Code of Conduct and follow-up routines.

cBook is our employee handbook and together with a comprehensive onboarding training program and HR processes ensures selection of the right people with the cBrain spirit and mindset rooted in Nordic culture and values, we make sure that our people are guided well. As an example, the onboarding program includes a 2 hour roleplay session on ethical dilemmas.

A series of policies and processes supports what is mentioned above:

- **Human Rights Policy**
- **Bribery and Anti-Corruption Code**
- **Diversity Policy**
- **Data Ethics Policy**
- **Fair Labour Practice**
- **Tax Policy**
- **Whistleblower Policy and Procedure**

All policies are available at cBrain's website: and can be found here: <https://cbrain.com/corporate-governance>. Whistleblower is access via <https://cbrain.com/csr>.

Steps implemented and reoccurring commitments

Since 2018 a series of policies and procedures has been developed and implemented including ongoing training of staff to ensure that the strong culture of acting responsibly to reach our goals that cBrain was founded on are maintained and even strengthened to avoid risks of compromising our value set.

Policies are reviewed and updated on a regular basis and overseen by the Audit Committee and the Board of Directors.

Due Diligence processes have been implemented alongside cBrain's international expansion, supplemented by an ethical framework to ensure that we protect the value set of the company.

In annual assessments cBrain ranks at the top amongst its peers when it comes to high ethical standards and having the requisite policies and procedures in place. The UN SGD #16 (Peace, justice and strong institutions) is one of our three goals which makes it natural for cBrain to have a strong focus on human rights.

In 2023 cBrain became a Nasdaq ESG transparency partner.

Steps taken during 2024

cBrain is due to implement EU's Corporate Sustainability Reporting Directive (CSRD) in 2026. However cBrain has decided to start the implementation in 2024. As a part of the implementation process the supply chain has been reviewed and investigated thoroughly and thereby gained valuable insight. The double materiality assessment has been undertaken and interviews with different stakeholders have been carried out and brought new insights to the enhancement of our processes.

Our Whistleblower Framework was implemented in 2020 and has been reviewed and retested and access to the Whistleblower Framework on our website has been improved.

Further information

Further information is to be found here:

<https://cbrain.com/investor>

<https://cbrain.com/corporate-governance>

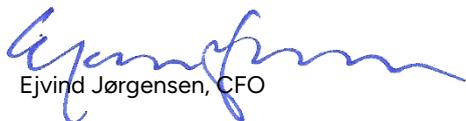
<https://cbrain.com/csr>

<https://cbrain.com/csr-reports>

Approved by the board of directors

The statement has been approved by the Board of Directors of cBrain A/S

Copenhagen, August 6, 2024


Ejvind Jørgensen, CFO