



## MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2019

### Who We Are

CyberArk Software Ltd. is a publicly traded cybersecurity software company, the global leader in privileged access management. Founded in Israel in 1999, we are headquartered in Petach Tikva, Israel, with U.S. headquarters located in Newton, Massachusetts and have offices across the globe, including in the United Kingdom.<sup>1</sup>

### Our Commitment

In accordance with our core values, we are committed to doing business with integrity, including protecting and advancing human dignity and human rights in our global business practices and throughout our supply chains.

The Board of Directors and Executive Management Team (referred to as our Board and Management) of CyberArk will not tolerate or condone human trafficking, modern slavery or any other human rights abuses in any part of our global organization. In any instance where such abuses are suspected, we will act swiftly to investigate and remedy the situation.

### Our Assessment of Our Risks

In 2018 we completed an initial risk assessment of our business practices and supply chains for human rights abuses, including human trafficking and modern slavery. We have concluded that the risk is relatively low. This is because our core areas of business are the development, sale and aftermarket support of software and cloud-based cybersecurity solutions, which do not rely on low-wage labor or target vulnerable populations such as children or immigrants. We do not engage in any manufacturing activities. At our offices, we purchase goods and services such as food, cleaning, and marketing products from well-established national and local businesses. Similarly, primary business partners are well-established distributors, resellers and technology partners, who do not rely on vulnerable populations or engage in the manufacture of goods where human trafficking and modern slavery are most likely to occur.

Nevertheless, we recognize that human rights abuses can occur within any organization and its supply chain. With that in mind, we have worked to implement stronger policies and controls within our business and supply chain.

### Our Policies

In accordance with our commitment to combat human trafficking and modern slavery, we have adopted and implemented the following policies:

Published on CyberArk's Corporate Responsibility page:

- ❖ **This Modern Slavery Statement.** We will continue to publish a statement annually describing our ongoing efforts to combat modern slavery and human trafficking.

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<sup>1</sup> CyberArk Software Ltd. together with its global subsidiaries including CyberArk Software Limited (CyberArk's trading entity within the United Kingdom), are referred to collectively in this statement as "CyberArk."



- ❖ **Global Human Rights Statement.** This Statement sets forth our company’s recognition and respect for human rights in its global business and throughout its supply chain and encouraging the reporting of any concerns.
- ❖ **U.K. Health and Safety Policy.** This statement recognizes our responsibility to provide a safe work environment for our employees. Applicable to the U.K., we have plans to apply similar policies globally in 2020.
- ❖ **Environmental Statement.** This Statement sets forth our continuous commitment to minimize the impact of our operations on the environment while enhancing sustainable business practices as part of our ongoing commitment to employees, customers, partners, shareholders, and the communities in which our employees live and work.
  
- ❖ **Vendor and Business Partner Code of Conduct.** Applicable to our vendors, suppliers, distributors, partners, business associates, and third-party representatives, this Vendor and Business Partner Code of Conduct sets forth our expectation that our business partners will uphold high standards of ethics and comply with all applicable laws and regulations, including all applicable human rights laws prohibiting child, forced, indentured, or involuntary labor.

Internal Policies, available to all CyberArk employees and published on the Investors Relations section of our website:

- ❖ **Code of Conduct.** Our Code of Conduct reflects our core values and provides guidance to employees on how to act with integrity, honesty and professionalism and to maintain the highest standards of ethical conduct in all our activities.
- ❖ **Whistleblower Policy.** Our Whistleblower Policy provides for confidential and, to the extent permitted by law, anonymous reporting of any suspected wrongdoing and a commitment to non-retaliation for reports made in good faith.
- ❖ **Anti-Corruption Policy.** We recognize that human rights abuses and corruption go hand-in-hand. Our Anti-Corruption Policy establishes a zero tolerance for corruption and bribery in our business operations, including for all business partners acting on our behalf. The full policy is made available to all employees and a summary of the policy is published on the Investor Relations section of our website.

### **Our Key Controls**

We have continued our strong efforts in 2019 to implement controls across our business, including the following:

- **Strong Tone from the Top:** A demonstrated commitment from our Board and Management on conducting business with integrity
- **Policies:** Policies that unequivocally denounce human trafficking and modern slavery and set forth a commitment to combatting such abuses
- **Program Management:**
  - Dedicated global compliance counsel for in-house compliance program management, oversight and optimization, along with Compliance Officer oversight
  - The recent addition of a global procurement function to oversee procurement across our business operations and optimize vetting of vendors in the supply chain
- **Reporting Channels:** A publicly available reporting hotline allowing for anonymous reporting of any suspected wrongdoing



### **Contractual Controls & Consequences**

- A contractual commitment to respecting applicable laws and, for newer contracts, an agreement to comply with our Vendor Code of Conduct
- Potential termination of the business relationship for a violation of the Vendor and Business Partner Code of Conduct

### **Our Next Steps in 2020**

- Revisiting and updating our risk assessment
- Reviewing our current internal controls
- Applying policies similar to our U.K. Health & Safety Policy to our corporate operations globally
- Publicizing and further distributing our Vendor and Business Partner Code of Conduct
- Continuing our Environmental, Sustainability, and Governance initiatives across our global offices

Our Board and Management believe that such steps will positively contribute to the protection and advancement of the inalienable dignity and human rights of all individuals.

This Statement has been reviewed and approved by CyberArk's Board on May 6, 2020 and applies to the fiscal year 2019 (ending 31 December 2019). We will provide an updated statement on our ongoing efforts on an annual basis.

In signing this Statement on behalf of CyberArk's Board, we affirm our commitment to protecting and defending human rights in all aspects of our global business practices.

Signed,

Ehud (Udi) Mokady

/s/ Udi Mokady

Chairman & CEO

CyberArk Software Ltd.

May 6, 2020