

Annual Statement on Modern Slavery and Human Trafficking

Document Control

| | |
|------------------|---|
| Document | Annual Statement on Modern Slavery and Human Trafficking |
| Reporting Period | Fiscal Year 2025 (January 1, 2025 – December 31, 2025) |
| Control Mapping | O.13.6 Environmental, Social and Governance · Prudential Dec 2025 assessment, Finding No. 2 |
| Version | 1.0 |
| Effective Date | April 16, 2026 |
| Publication | Published at sequoiaport.com/modern-slavery-statement; provided to customers on request. |
| Approver | Dan David, Chief Executive Officer |
| Next Review | Annually, within 120 days of fiscal year end |

I'm publishing this statement in response to a third-party risk assessment finding from one of our customers in December 2025 (Finding No. 2, control O.13.6), which noted that SQP did not have an annual statement on modern slavery and human trafficking.

This is SQP's first such statement, covering fiscal year 2025. It will be reissued annually.

Dan David, CEO

Statement

This statement is made by Sequoia Port Inc. ("SQP") for the fiscal year ended December 31, 2025. It sets out the steps SQP takes to prevent modern slavery and human trafficking from occurring in our business or in our supply chain. SQP has zero tolerance for modern slavery, human trafficking, forced labor, prison labor, or child labor in any form, in our own operations or among the suppliers we engage.

1. About SQP

- SQP is a Delaware-domiciled technology company headquartered in the United States.

- We build healthcare data infrastructure the intelligence layer that makes medical records decision-ready for enterprises. Our customers include disability carriers, medical review organizations, third-party administrators, life-care-planning and Medicare Set-Aside firms, and dispute-resolution entities, including Tier 1 US insurance carriers.
- Our workforce is small, distributed, and majority knowledge work. SQP does not manufacture physical goods.
- All SQP employees and contractors are currently US based, and pass a US background check at hire.

2. Our commitment

SQP commits to lawful, ethical, and humane business practices in every relationship our employees, our contractors, our suppliers, and our customers. We expect the same commitment from any vendor we engage.

3. Our business and supply chain

Our supply chain is concentrated in professional services and software. It consists primarily of:

- Cloud infrastructure providers (AWS, GCP) and enterprise SaaS vendors (observability, SSO, development tools).
- Legal, accounting, tax, and compliance advisors based in the United States.
- Independent contractors providing engineering, design, clinical, and operational services predominantly Indexers, all based in the United States.
- Small volumes of office supplies and hardware (laptops, displays) sourced from established enterprise vendors.

Given the composition of this supply chain regulated enterprise software, US-based professional services, and major-brand hardware we assess the risk of modern slavery and human trafficking in our direct operations as low. We monitor for changes that would alter that assessment.

4. Policies and governance

- SQP Code of Conduct: commits all employees, contractors, and consultants to lawful, ethical, and humane business practices and prohibits any involvement in forced, prison, or child labor or human trafficking.
- SQP Supplier Code of Conduct (SQP-ESG-SUP-01): extends the same standards to our suppliers.
- SQP Anti-Bribery and Anti-Corruption Policy: reinforces our ethical-conduct expectations of employees and suppliers.
- SQP Whistleblower Policy: enables employees, contractors, and third parties to raise concerns in good faith without fear of retaliation, via an anonymous channel to the CEO and Board.

- Board oversight: the CEO reports annually to the Board on ESG and third-party risk, including compliance with this statement.

5. Due diligence

- Supplier onboarding includes a review of the supplier's public policies, jurisdictional risk, and any adverse media related to labor practices.
- Material suppliers are required to acknowledge the SQP Supplier Code of Conduct or to demonstrate equivalent published standards of their own.
- Higher-risk engagements (non-OECD jurisdictions, physical goods, labor-intensive outsourcing) are subject to enhanced due diligence including supplier questionnaires and documented attestation.
- All contractor engagements include written agreements that prohibit the use of forced, prison, child, or trafficked labor.

6. FY 2025 review

In FY 2025 SQP reviewed its supplier population against jurisdiction, industry, workforce composition, and adverse media. No suppliers were flagged as higher-risk requiring enhanced due diligence. No concerns were raised through any reporting channel during the period.

7. Training and awareness

- All employees and contractors acknowledge the SQP Code of Conduct at onboarding and annually thereafter.
- The CEO and People Operations review modern slavery and human trafficking awareness annually as part of the security and compliance cycle.
- Suppliers onboarded in the coming fiscal year will receive the SQP Supplier Code of Conduct as part of their agreement.

8. Effectiveness and FY 2026 commitments

SQP measures the effectiveness of this program through three indicators:

- Percentage of material suppliers that have acknowledged the Supplier Code of Conduct or demonstrated equivalent standards. FY 2026 target: 100%.
- Number of concerns raised via the whistleblower or other reporting channels, and the percentage investigated and resolved. FY 2026 target: 100% investigated.
- Completion of annual training acknowledgement. FY 2026 target: 100%.

In FY 2026 SQP will: publish the Supplier Code of Conduct on the SQP public website; embed Supplier Code acknowledgement language into all new material supplier agreements; publish this statement on the SQP public website; and complete the first formal annual review under this program.

9. Approval

This statement was approved by the CEO of Sequoia Port Inc. on behalf of the company on April 16, 2026. It will be reviewed and reissued annually.



Dan David, Chief Executive Officer

Sequoia Port Inc.

Date: April 16, 2026