



Transparency - Statement of Principles

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1 Statement of Principles

Transparency is a pillar of good governance. The United Nations Guiding Principles on Business and Human Rights which guide us in fulfilling our obligation to respect human rights throughout our business activities require public disclosure on how a business enterprise is addressing human rights impacts in a form and frequency that reflect the enterprise's human rights impact and that are accessible to its intended audiences.

We are committed to reporting publicly to the greatest extent possible on the effectiveness of our Human Rights Policy and related procedures. Our aspiration is to set the standard for transparency in the digital surveillance and communication interception sector. However, strict legal, contractual and commercial constraints limit our freedom to disclose specific information, including information regarding our customers and our products. We strictly adhere to such legal, contractual and commercial constraints on our reporting. Furthermore, as we have no knowledge of the actual use of our products by our customers, we cannot report on it. Within these constraints we will disclose the principles and a summary of our procedures and major public information sources to which we resort. We will publish key information to demonstrate our effectiveness in meeting the obligations set out in our Human Rights Policy. Overtime, after fully implementing and operating our new governance system, we will seek periodic independent reviews by experienced compliance experts. We will aim to include summaries of such reviews into our reporting.

2 Our Commitments

- (i) Publish our Code of Conduct, Human Rights Policy and summaries of related procedures on our website.

Publish on our website annually a Corporate Responsibility Report including information regarding the implementation and effectiveness our Human Rights Policy and related procedures.