

## **Modern Slavery & Human Trafficking Transparency Statement**

Bright Data Ltd.

Financial year: 1 January 2026 - 31 December 2026

Made pursuant to Section 54 of the UK Modern Slavery Act 2015

Approved by: Board of Directors

Signed by: Daniel Rix-Standing, Director

Publication: <https://brightdata.com/legal-governance>

### 1. Introduction -

This statement is made by Bright Data Ltd. ("Bright Data") pursuant to Section 54 of the UK Modern Slavery Act 2015 and describes the steps taken in the prior year and the steps planned in the current financial year to prevent modern slavery and human trafficking in our business and supply chains. While made for UK purposes, Bright Data takes a global approach and voluntarily aligns with emerging best practices in other jurisdictions (including Australia, Canada and California).

### 2. Our business and supply chains Bright Data is a global technology company providing web data collection tools and services (including proxy networks, scraping tools, datasets and data insights) to enable legitimate and ethical access to publicly available web data. We operate from Israel with customers and suppliers across multiple jurisdictions. Our supply chains include technology infrastructure, software, professional services and other business support services.

### 3. Policies and governance Our commitments and controls include:

- Code of Conduct (including anti-slavery/human-trafficking prohibitions)
- Human Rights Policy (UNGPs/ILO aligned)
- Whistleblowing (Speak-Up) & Non-Retaliation Policy
- Supplier contractual clauses (including audit and termination rights for breach)

Oversight of this statement and related controls rests with senior management and the Board.

### 4. Risk assessment and due diligence -

We operate a risk-based approach. Currently this includes legal/sanctions/KYC checks at onboarding and contractual compliance clauses. Where risk is elevated, we may request attestations or take further steps

5. Actions taken in the prior year -

We maintained baseline controls (Code of Conduct, contractual clauses, reporting channel) and scoped enhancements for FY 2026.

6. Training and awareness -

Targeted briefings are provided as needed; a formal module for relevant teams is planned for FY 2026.

7. Supplier engagement and monitoring -

For suppliers in higher-risk regions or sectors, we may conduct enhanced due diligence, request additional attestations or documentation, and where appropriate commission audits or independent verification. Suppliers that fail to remediate identified issues may be suspended or terminated.

8. Grievance, reporting and remedy -

Concerns can be raised through [legal@brightdata.com](mailto:legal@brightdata.com) or by post to Legal Team, Bright Data Ltd., 4 Hamahshev St., Netanya 4250714, Israel.. Reports are assessed, investigated and remediated as appropriate. We prohibit retaliation against any person who raises a concern in good faith.

9. Measuring effectiveness (KPIs) -

We will monitor and, where appropriate, report on indicators such as: number of supplier screenings and enhanced due diligence reviews; percentage of procurement/compliance teams trained; number of incidents raised/resolved; and supplier remediation outcomes.

10. Next steps (FY 2026) During FY 2026 we plan to:

- Expand supplier coverage and risk screening, including deeper tiers where feasible
- Strengthen supplier contractual templates and flow-down requirements
- Enhance training content with sector-specific risk scenarios
- Pilot an expanded supplier attestation or audit program in higher-risk regions

11. Additional jurisdictional note -

This statement is issued by Bright Data Ltd. Where local laws require consultation with owned or controlled entities, or a separate modern-slavery statement, Bright Data will assess applicability and, if in scope, prepare and lodge any required filings and describe the consultation in future statements.

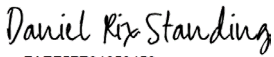
12. Approval and signature -

This statement was approved by Bright Data Ltd.'s Board of Directors on December 8, 2025 and signed by:

Daniel

Rix-Standing,

Director

Signed by:  
  
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