

Modern Anti-Slavery Statement



THRIVE  SM

Thrive Operations, LLC
Thrive Operations Limited
Thrive Operations Canada, LTD.
Thrive APAC Holdings, LLC

Publication Date: 13 February 2026

This statement relates to the financial year ending 31 December 2025.

Overview

This Statement is made pursuant to Section 54 of the *Modern Slavery Act 2015* and outlines the steps that Thrive Operations, LLC (“Thrive” or the “Company”) has taken and will continue to take that ensure modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labor, bonded and child labor, and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with the knowledge or intention that the person will be exploited. Modern slavery is a crime and a violation of fundamental human rights. Thrive has a zero-tolerance approach to modern slavery and human trafficking and strictly prohibits the use of modern slavery in our operations and supply chain. Thrive has and will continue to remain committed to maintaining effective systems and controls to prevent slavery in our operations and supply chains.

About Thrive

Thrive is a NextGen 3.0 global technology outsourcing provider that empowers small and mid-market organizations to transform their technology into a strategic advantage. Offering a breadth of services from AI and cybersecurity to cloud, compliance, and traditional MSP/MSSP solutions, Thrive’s team of seasoned experts develop strategies that standardize, scale, and automate technology to achieve outsized ROI. From advisory services to a 24x7x365 SOC and NOC, Thrive provides end-to-end IT and cybersecurity management so clients can focus on innovation and growth.

Thrive Operations, LLC is a Delaware limited liability company headquartered in Foxborough, MA (USA) with affiliate entities in Canada, United Kingdom, Singapore, Philippines, Hong Kong, and Australia. The Company maintains partnerships with vendors and suppliers to provide the technology, Cloud, and MSP/MSSP solutions.

High Risk Areas

Thrive operates in some areas with statistically elevated modern slavery risks, especially in the APAC region. Primary vendors in these regions are data center facility providers who have confirmed modern slavery practices in place.

Operations and Supply Chain

No instances of modern slavery have been identified in our operations or supply chain during the financial year ending 31 December 2025.

Thrive Policies

Thrive maintains internal policies and procedures to ensure the company is conducting business in an ethical and transparent manner. Relevant policies include our *Code of Conduct*, *Anti-Bribery and Corruption*, and *Anti-Slavery and Human Trafficking* policies – details pertaining to both are included below.

Code of Conduct

Thrive's Code of Conduct ("Code") is a roadmap for how we intend to serve our mission and conduct our business. The Code is built around the recognition that everything we do with our work at Thrive will be, and should be, measured against the highest possible standards of ethical business conduct. Respect for our customers and for each other are foundational to our success and is something we need to support every day. The underlying values of our Code may be simply stated as: *Act with integrity.*

All employees must acknowledge the Code upon hire and then annually thereafter and the Code is updated and approved at least annually. The Code is designed to deter wrongdoing and promote:

- Ethical and responsible conduct with respect to our colleagues, workplace, business partners, shareholders, and the marketplace.
- Responsible and prompt reporting of activities that violate the ethical principles outlined within the Code.
- Compliance with applicable laws and regulations.
- Accountability and responsibility for adherence to the Code.

Anti-Corruption and Bribery

Thrive is committed to protecting the Company and its stakeholders against economic crimes including fraudulent activities that could harm the Company's financial integrity and reputation. The *Anti-Corruption and Bribery* policy is designed to ensure financial transactions and other activities undertaken on behalf of Thrive do not violate anti-bribery laws, and that Thrive has reasonable procedures in place to prevent fraud by employees and personnel associated with the Company.

Anti-Slavery and Human Trafficking

Thrive maintains this policy which details the Company's position with respect to modern slavery along with controls and protocols in place for detecting and reporting any actual or suspected instances of modern slavery and/or human trafficking. Thrive expects everyone working for or on behalf of the company to support and uphold the processes defined within the policy.

Recruiting

Thrive's Human Resources Department is responsible for managing our talent acquisition program which includes robust procedures to evaluate candidates in all regions. Processes include checking eligibility work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Vendors and Suppliers

Thrive has a zero-tolerance policy for slavery and human trafficking. Thrive expects all vendors, suppliers, and contractors to operate under the same ethical standards contained within our policies.

Due Diligence

Thrive performs due diligence on all new vendors prior to contracting and on an ongoing basis for all vendors based on business criticality. The vendor due diligence process includes an evaluation of the vendor's modern slavery practices to ensure alignment with Thrive's standards.

Training and Awareness

Thrive makes all policies and procedures available to all employees via an internal intranet site. Furthermore, all employees are required to acknowledge the *Employee Handbook* and *Code of Conduct* on an annual basis which contain information on ethical behavior, integrity within business practices, and procedures for reporting violations. Thrive will also provide additional training and awareness materials around modern slavery and human trafficking to employees within human resources and procurement departments including signs of modern slavery and reporting protocols.

Performance Indicators

Thrive gauges the effectiveness of our anti-slavery and human trafficking processes by monitoring reports received from employees, the public, vendors, and law enforcement agencies indicating if modern slavery practices have been identified.

Review

This Statement is reviewed and updated on an annual basis.

Approval

This statement is approved by the undersigned on behalf of Thrive's Board of Directors.

Name: Bill McLaughlin
Bill McLaughlin (Feb 17, 2026 14:34:32 EST)

Title: CEO

Date: 17/02/26