

Ookla, LLC

Modern Slavery and Human Trafficking Statement 2026 for the financial year ending December 31, 2025

This Modern Slavery and Human Trafficking Statement ("Statement") is made by Ookla, LLC in respect of it and its subsidiaries (together "Ookla" or "we"). The statement is made pursuant to the obligation on Ookla to publish a Transparency in Supply Chains statement, under section 54(1) of the UK Modern Slavery Act 2015 (the "Act").

This Statement sets out the steps that we have taken and will continue to take to prevent any modern slavery or human trafficking occurring in our business and supply chains during the financial year ending December 31, 2025.

Ookla

We are committed to creating and maintaining ethical business practices and standards. We are committed to meeting or exceeding ethical business and legal compliance standards in every aspect of our operations. We have a zero-tolerance approach to modern slavery and human trafficking, and through our policies and business approach we are committed to ensuring compliance in our operations.

Structure, Organisation and Risk

Ookla is a global leader for fixed, mobile and WiFi network design, intelligence, insights, testing and incident detection. Ookla brands help plan, solve problems, and ensure better, faster and more accessible connectivity for individuals and enterprises.

Our ultimate parent company is Ziff Davis, Inc. ("Ziff Davis"). Ookla is a division of Ziff Davis, and Ziff Davis has its head office in the United States. We have over 400 employees worldwide and operate in the United States, United Kingdom, Finland, Ireland, the Netherlands, Spain, Sweden, the United Arab Emirates, and Malaysia.

Overall, we consider Ookla to be at low risk of modern slavery or human trafficking in our business and supply chains, due to the nature of our products and business. However, we do acknowledge the importance of remaining vigilant to the risks of modern slavery and human trafficking in our supply chain.

Our supply chain supports our global operations and primarily involves the procurement of services and essential goods to run a large, international technology business.

Tier 1:

Goods Sourced: Our supply chain includes procuring goods such as IT equipment and office supplies.

Services Sourced: We procure business support services, including professional services, cloud services, professional services and enterprise software. These suppliers are typically multinational corporations with their own comprehensive Modern Slavery compliance programs.

Supply Chain Understanding

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

Our Supply Chains

We recognise that visibility beyond Tier 1 (our direct suppliers) in certain segments of our supply chain, such as raw material extraction for IT equipment, is a challenge. We are working to address this challenge through our planned modern slavery risk assessment in the next financial year.

Continuous Improvement of Operations and Supply Chain Knowledge

1. Our Policies on Slavery and Human Trafficking

Here at Ookla, we have a suite of policies which serve to demonstrate our dedication and commitment to maintaining high standards in business, ethics, and conduct. Ookla and its parent company Ziff Davis have adopted various global policies as follows, which have been in place over the last financial year. The following policies are relevant to modern slavery and human trafficking:

Policy	Summary of Relevance to Modern Slavery	Brief Summary of What Each Policy States
Human Rights Policy	Ziff Davis' Human Rights Policy serves as the ethical foundation for its	Ziff Davis' Human Rights Policy is a commitment to respecting and

	<p>anti-slavery efforts, establishing a corporate commitment to respecting fundamental rights and adhering to international standards that prohibit forced labor and human trafficking. This policy is directly relevant to a modern slavery statement by mandating that its entire supply chain, through the Vendor Code of Conduct, implements due diligence measures and utilizes the corporate whistleblower system to identify and remediate any potential exploitation.</p>	<p>promoting all forms of human rights—civil, cultural, economic, political, and social—with a special focus on the rights of women and minority groups, as well as the rights to privacy and freedom of expression.</p>
<p>Whistleblower Policy</p>	<p>The Whistleblower Policy provides a necessary grievance mechanism for anyone including employees and vendor staff to confidentially and safely report suspected modern slavery, human trafficking, or related human rights violations. By explicitly prohibiting retaliation and offering anonymous channels, the policy demonstrates a key accountability measure required to show a robust</p>	<p>Ziff Davis' Whistleblower Policy and process are designed to encourage the reporting of concerns about potential "Unlawful Activities" while protecting the confidentiality and anonymity of the reporter. The policy applies to employees, vendors, and other partners.</p>

	<p>commitment to eliminating exploitation in a Modern Slavery Statement.</p>	
<p>Labor Rights Policy</p>	<p>The Labor Rights Policy explicitly establishes a strict prohibition on forced labor, human trafficking, and exploitative practices within Ziff Davis' operations and vendor supply chain. This policy, which aligns with international ILO standards for fair wages, safe conditions, and collective bargaining, provides the specific due diligence steps and ethical metrics a company must report to demonstrate its commitment to eliminating modern slavery risks.</p>	<p>Ziff Davis' Labor Rights Policy is a formal commitment to upholding fair labor practices across all of its operations, brands, and subsidiaries globally.</p>
<p>Code of Conduct and Ethics</p>	<p>The Code of Conduct and Ethics provides the overarching ethical mandate, requiring all employees and directors to conduct business with honesty and the highest ethical standards, which fundamentally prohibits engaging in or condoning modern slavery. It is relevant to a modern</p>	<p>Ziff Davis' Code of Business Conduct and Ethics serves as the company's foundational guide for all employees, officers, and directors, requiring them to operate with the highest ethical standards and in full compliance with the law. All employees must read and accept the</p>

	<p>slavery statement by establishing a clear anti-exploitation culture and creating accountability for compliance by flowing these ethical requirements down to third-party vendors who agree to the Vendor Code of Conduct.</p>	<p>Code of Conduct and Ethics as part of Ziff Davis' annual compliance training.</p>
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1. Supplier Due Diligence For Slavery and Human Trafficking

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains. We expect the same high standards from all our suppliers and have a thorough approval process with several stages including senior legal, procurement and management levels. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. No modern slavery or human trafficking concerns have been identified during the course of those due diligence processes in the last financial year.

Grievance Mechanisms

We have the [Whistleblower Policy](#) in place to serve as a grievance mechanism. This policy is designed to enable colleagues and third parties to raise concerns about our practices or those of our suppliers and subcontractors. We aim to ensure that our policy is communicated clearly and effectively to enable safe and accessible reporting.

Remediation Policies and Processes

We will continue to remain vigilant, and should any concerns be identified, we will take appropriate steps to investigate, understand, and mitigate identified issues.

2. Identifying, Assessing, and Managing Risk of Slavery and Human Trafficking

Overall, we consider Ookla to be at low risk of modern slavery or human trafficking in our business and supply chains, due to the nature of our products and business.

However, we do acknowledge the importance of remaining vigilant to the risks of modern slavery and human trafficking in our supply chain.

3. Monitoring and Evaluation: Our Effectiveness in Combatting Slavery and Human Trafficking

KPIs

During the next financial year, we are committed to implementing key performance indicators (KPIs) to aid us in measuring the effectiveness of the steps we are taking. Our KPIs will be outcome-focused and linked to our modern slavery goals.

4. Training

We are committed to implementing an effective training program on modern slavery.

Internal Training

During the next financial year, we are committed to integrating into our essential training program, training on our policies relevant to modern slavery and human trafficking, and on the risk our business faces from modern slavery and human trafficking in its supply chains for all employees and colleagues.

This will include training tailored to roles most at risk of encountering modern slavery in the supply chain, such as Procurement, Human Resources, and Legal staff.

Next steps

During the next financial year, we are considering taking a number of further steps to ensure slavery and human trafficking is not occurring in any of our businesses or supply chains. This includes:

- Implementing key performance indicators to aid us in measuring the effectiveness of the steps we are taking.
- Integrating into our essential training program, training on our policies relevant to modern slavery and human trafficking, and on the risk our business faces from modern slavery and human trafficking in its supply chains for all employees and colleagues.

During the last financial year, we have not received any whistleblowing reports relating to modern slavery or human trafficking issues, or otherwise become

aware of any potential modern slavery or human trafficking issues connected with our businesses or supply chains.

We will continue to remain vigilant, and should any concerns be identified, we will take appropriate steps to investigate, understand and mitigate identified issues.

Approved by the sole Member of Ookla, LLC on January 6, 2026.

Signed by Julianna Orgel-Eaton, Assistant Secretary of Ookla, LLC on January 6, 2026.

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