

HAWK:AI - EXECUTIVE SUMMARY OF SOC 2 REPORT

Observation Period: April 1, 2023 to July 31, 2023

Auditing Firm: A-Lign

Scope of the Audit

All Common/Security Criteria were applicable to HAWK:Al's Anti-Money Laundering, Fraud- and Financial Crime Prevention Software System

Test Results and Exceptions

Across the 61 applicable control points 299 tests were performed to assess the effectiveness of HAWK:Al's controls. Of those 296 tests,

- 282 tests noted no exceptions
- 12 tests resulted in exceptions*
- 2 tests were not applicable

The 12 exceptions* noted in the tests refer to:

- Acknowledgement of the code of conduct (affecting CC1.1, CC1.5, CC2.2)
- Performance evaluations (affecting CC1.1, CC1.2, CC1.4, CC1.5, CC4.1)
- Employee security awareness training (affecting CC1.4, CC2.2)

(*see Annex 1 for a list of the exceptions)

HAWK:Al's Management acknowledges all reported exceptions and laid out a timeline for their remediation. All reported exceptions will be remediated latest by Q2/2024.

Timeline for the next observation period

HAWK:AI will conduct the next annual re-audit of its Anti-Money Laundering, Fraud- and Financial Crime Prevention Software System in 2024.





Annex 1

Control Points with Exceptions

CC1.1: The entity demonstrates commitment to integrity and ethical values:

- Testing of the control activity disclosed that the code of conduct was not acknowledged for five of five new hire samples.
- Testing of the control activity disclosed that a performance and conduct evaluation was not completed for five of ten current employees sampled.

CC1.2: The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal control:

 Testing of the control activity disclosed that a performance and conduct evaluation was not completed for five of ten current employees sampled.

CC1.4: The entity demonstrates a commitment to attract, develop, and retain competent individuals in alignment with objectives:

 Testing of the control activity disclosed that a performance and conduct evaluation was not completed for five of ten current employees sampled.

CC1.5: The entity holds individuals accountable for their internal control responsibilities in the pursuit of objectives:

- Testing of the control activity disclosed that the code of conduct was not acknowledged for five of five new hire samples.
- Testing of the control activity disclosed that a performance and conduct evaluation was not completed for five of ten current employees sampled.

CC2.2: The entity internally communicates information, including objectives and responsibilities for internal control necessary to support the functioning of internal control:

- Testing of the control activity disclosed that the code of conduct was not acknowledged for five of five new hire samples.
- Testing of the control activity disclosed that a performance and conduct evaluation was not completed for five of ten current employees sampled.



 Testing of the control activity disclosed that security awareness training was not completed for three of ten current employees sampled

CC4.1: The entity selects, develops, and performs ongoing and/or separate evaluations to ascertain whether the components of internal control are present and functioning:

- Testing of the control activity disclosed that the code of conduct was not acknowledged for five of five new hire samples.
- Testing of the control activity disclosed that a performance and conduct evaluation was not completed for five of ten current employees sampled.
- Testing of the control activity disclosed that security awareness training was not completed for three of ten current employees sampled