

---

MICRO FOCUS

Supplier Code of Conduct

## Contents

Contents .....	2
Introduction .....	3
Laws And Ethical Standards .....	3
Anti-Slavery And Human Trafficking .....	3
Working Hours And Wages .....	3
Non-Discrimination .....	3
Anti-Bribery And Corruption .....	3
Tax Evasion.....	4
Anti-Money Laundering .....	4
Fraud .....	4
Privacy, Technology And Data Protection Laws .....	4
Health & Safety .....	4
Environment.....	4
Conflicts Of Interest .....	4
Freedom Of Association And Collective Bargaining.....	4
Third Party Communication .....	4
Notification And Investigations.....	5
Independent Contact Point:.....	5
Revision History.....	5

## Introduction

At Micro Focus, we believe in the importance of ensuring that our business is conducted to the highest of ethical standards.

We also expect our Suppliers to uphold the highest of ethical standards over the course of their business operations by complying with the below standards, or their own equivalent standards suitable for their business, which must be no less stringent than those set out below. Micro Focus Suppliers are responsible for ensuring that their Employees (regular and temporary), officers, directors, agents, independent contractors and sub-contractors comply with the requirements of this Supplier Code of Conduct, or their own equivalent standards, which must be no less stringent than those set out below.

**"Supplier"** or **"Suppliers"** means any firm or individual that provides a product or service or undertakes any activity for or on behalf of Micro Focus, either directly or indirectly.

**"Employee"** means any individual who works for a Supplier, whether under a contract of employment or any other contract (written or oral) where an individual undertakes to do personally any work or services for the Supplier.

## Laws And Ethical Standards

Our Suppliers shall comply with all laws applicable to their business and will support the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights, as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.

## Anti-Slavery And Human Trafficking

Suppliers shall take all reasonable steps to ensure that slavery, servitude, human trafficking, forced or compulsory labour and/or child labour do not take place in its supply chains or in any part of its business (including making all necessary enquiries with its suppliers and, to the extent reasonable, other parties in the supply chain).

Suppliers shall comply with the Modern Slavery Act 2015 and the commitments in Micro Focus's Modern Slavery Act Statement and Policy, as updated from time to time.

## Working Hours And Wages

Suppliers shall follow all applicable local laws and regulations in relation to working hours, and all overtime must be voluntary. The Supplier's employees must be provided with wages that, as a minimum, comply with national laws.

## Non-Discrimination

Suppliers shall not discriminate on the basis of race, religion, ethnicity, disability, age, sexual orientation, political affiliation, union membership, gender, marital status or gender identity. Suppliers shall provide a workplace free of inhumane and degrading treatment, including sexual harassment, sexual abuse, corporal punishment, mental, physical or verbal abuses of Employees and with no threats of such treatment.

## Anti-Bribery And Corruption

The Supplier must never, directly or through its intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party. The Supplier must not pay or receive bribes or kickbacks and shall not take any actions to violate, or cause its business partners to violate, any applicable anti-bribery laws and regulations (including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act).

## **Tax Evasion**

Suppliers must not evade paying tax or knowingly assist others to evade taxes. "Tax evasion" generally refers to the illegal evasion of taxes where individuals or organisations dishonestly or fraudulently under-declare their taxes.

## **Anti-Money Laundering**

Micro Focus Suppliers must not participate in money laundering and must comply with all applicable laws concerning money laundering and must not acquire, use, convert, conceal or possess the proceeds of crime, help another person to do so, or assist terrorist financing in any way.

## **Fraud**

Micro Focus Suppliers must have an understanding of the fraud risks in their business area and must not perform or be involved in any form of fraud or fraudulent activity.

## **Privacy, Technology And Data Protection Laws**

Micro Focus Suppliers must comply with all applicable privacy, technology and data protection laws and regulations, including but not limited to national, local and industry/sector specific laws or regulations. In addition, Micro Focus Suppliers shall conduct their operations in a manner that complies with any specific requirements documented or otherwise incorporated into the contract. Confidential and sensitive information and data must be securely stored and not used for any purpose other than as agreed with Micro Focus.

## **Health & Safety**

We expect our Suppliers to strive for the highest standards of occupational health and safety. Suppliers shall comply with all applicable occupational health and safety regulations and provide a work environment that maintains the health of employees and prevents accidents, injuries and work-related illnesses.

## **Environment**

Suppliers shall conduct their operations in ways that are environmentally responsible and in compliance with all applicable environmental laws.

## **Conflicts Of Interest**

The Supplier shall report any situation which in relation to its business with Micro Focus appears to be a conflict of interest to Micro Focus and disclose if it becomes aware that any Micro Focus employee or professional under contract with Micro Focus may have a conflicting interest of any kind in the Supplier's business.

## **Freedom Of Association And Collective Bargaining**

The Supplier shall grant its employees the right to freedom of association and collective bargaining in accordance with all applicable laws and regulations.

## **Third Party Communication**

Suppliers shall communicate the principles stated in this Supplier Code of Conduct and detailed above to their sub-contractors and other business partners who are involved in supplying the products and services to them. Suppliers shall take reasonable steps to ensure such parties adhere to the same standards.

## Notification And Investigations

The Supplier shall co-operate fully with Micro Focus in any investigations or reviews relating to compliance with this Supplier Code of Conduct.

The Supplier shall report to Micro Focus any conduct of their employees and representatives, as well as any conduct of Micro Focus' employees and representatives, that is believed to be an actual, apparent or potential violation of this Supplier Code of Conduct or the Micro Focus Code of Conduct. Reports will be handled as confidentially as possible.

If Micro Focus Suppliers or their employees or representatives receive any request from a Micro Focus employee or representative to engage in any such improper or illegal conduct, Micro Focus Suppliers must also report such matter to Micro Focus.

Reports should be made to the relevant Micro Focus representative or to the Legal Team, using the options set out below. All reports will be handled as confidentially as possible.

By email: [compliance@microfocus.com](mailto:compliance@microfocus.com)

By post: Micro Focus, Attn: Legal Department, The Lawn, 22-30 Old Bath Road, Newbury, Berkshire RG14 1QN, United Kingdom

## Independent Contact Point:

<https://www.microfocus.com/speakup>

## Revision History

Revision	Description of Change
10 Jul 2019	Initial Release
28 Jan 2020	Updated owner
23 Nov 2021	Updated third party provider

<b>Department:</b>	Legal	<b>Policy Number:</b>	Micro Focus-L40-v 1.0
<b>Sponsor:</b>	Jane Smithard General Counsel	<b>Last Revision:</b>	23 November 2021
<b>Owner:</b>	Faustino Obeso	<b>First Effective Date:</b>	10 Jul 2019
		<b>Last re-validation Date:</b>	