

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

### **1. Policy statement**

#### **Modern slavery is a crime and a violation of fundamental human rights**

It takes various forms such as slavery, servitude, forced or compulsory labour, child labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

#### **Micro Focus has a zero-tolerance approach to modern slavery**

Micro Focus International PLC and its group companies ("Micro Focus") are committed to acting ethically and with integrity in all of its business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or supply chains. Our commitment to respecting human rights is guided by the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

#### **We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains**

Micro Focus' latest Anti-Slavery Statement is publicly available on our website [here](#) and is consistent with our disclosure obligations under section 54(1) of the Modern Slavery Act 2015 (the "Act").

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

#### **This Policy applies to all persons working for Micro Focus or on our behalf**

This includes people working in any capacity including staff members, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Micro Focus will continue to make public an Anti-Slavery Statement setting out the actions we are taking and intend to take in the future to help ensure our businesses and supply chains are free of slavery.

All staff members of Micro Focus are required to comply with this Policy. It does not form part of any employee's contract of employment and Micro Focus may therefore amend it at any time without notice.

### **2. Responsibility and training**

The Micro Focus Board has overall responsibility for ensuring that this Policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Group Compliance Officer has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.

Information on modern slavery is included in our company-wide Code of Conduct and related training. This training takes place annually and is obligatory for all employees, including our Sales, Marketing, Legal, Procurement and Finance teams.

You are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group Compliance Officer.

### **3. Compliance with this Policy**

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might constitute, lead to or suggest a breach of this Policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains, or those of any supplier, at the earliest possible stage in accordance with our Whistleblowing Policy. If issues are identified in relation to modern slavery, these should be immediately reported to your manager, the Legal department or by using a dedicated confidential independent contact point: <https://secure.ethicspoint.eu/domain/media/en/gui/104674/index.html>.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any of our supply chains constitutes any form of modern slavery, please raise this as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of our business or supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group Compliance Officer immediately. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Intranet or by contacting your local HR representative.

### **4. Communication and awareness of this Policy**

Our zero-tolerance approach to modern slavery should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **5. Breaches of this Policy**

Any staff member who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

## Revision History

Revision	Description of Change
12 December 2017	Initial Release
7 August 2020	Update

<b>Department:</b>	Legal	<b>Policy Number:</b>	Micro Focus-L25-v 1.0
<b>Sponsor:</b>	Jane Smithard, General Counsel	<b>Last Revision:</b>	7 August 2020
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