

MICRO FOCUS' FY20 ANTI-SLAVERY STATEMENT

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Modern Slavery Act") and covers the Micro Focus financial year starting on 1 November 2019 and ending on 31 October 2020. For the purposes of this statement, the definition of modern slavery is based on the definitions set out in the Modern Slavery Act 2015 and includes slavery, servitude, forced labour, child labour, human trafficking and workplace abuse.

This statement was approved by Micro Focus International Plc's Board of Directors on 24 March 2021 and is published on behalf of Micro Focus International Plc and its qualifying group companies. References to "Micro Focus", "we", "us", "our" or the "company" are to each of these entities.

Overview of Micro Focus

Micro Focus (LSE: MCRO.L, NYSE: MFGP) is a global enterprise software company supporting the technology needs and challenges of the Global 2000. Our solutions help organisations leverage existing IT investments, enterprise applications and emerging technologies to address complex, rapidly evolving business requirements while protecting corporate information at all times. Our product portfolios are Security, IT Operations Management, Application Delivery Management, Information Management & Governance and Application Modernization & Connectivity.

Micro Focus is headquartered in Newbury (United Kingdom) and the group has a presence in 48 countries worldwide, employing approximately 11,900 people. For more information visit www.microfocus.com.

Our Business

Micro Focus is a software company with a professional workforce. In the way and sector in which it operates, Micro Focus does not consider its own employees to be at high-risk of slavery, servitude, forced labour, child labour, human trafficking or workplace abuse.

In relation to our supply chains, we do not have an extensive range of local or international suppliers, nor do we operate any manufacturing facilities. Our supply chain broadly consists of contract and outsourced workers (mostly professional consultants), telephone-based support services and suppliers of goods and other services for our offices, such as stationery suppliers, caterers, office cleaners and marketing merchandise.

We are nonetheless committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery, forced labour and human trafficking does not take place anywhere in our business, distribution or supply chains.

Our operations are mainly office-based although, due to the COVID-19 pandemic, the majority of our staff worked from home for a large proportion of the financial year. We have worked hard to support our employees through these challenging times, including conducting an anonymised all-employee survey to better understand their concerns.

Zero-tolerance of Modern Slavery

Micro Focus remains committed to maintaining zero-tolerance of any form of modern slavery in its business or supply chains. We continue to develop a risk-based approach which includes clearly informing our suppliers of Micro Focus' obligations under the Modern Slavery Act and the ethical standards required of them.

We also continuously review our practices, systems and controls in relation to our supply chains to further identify, assess and monitor potential risk areas and identify ways to further mitigate the risk of slavery and human trafficking occurring. For example, in view of the large, diverse and growing body of evidence of the human rights violations being perpetrated in Xinjiang against the Uyghur Muslims, Micro Focus has confirmed that none of its vendors have links to the region.

We include requests for information on modern slavery and supply chains in our Requests for Proposals. Some of the practices and controls that we have implemented consist of:

- Including in Micro Focus' standard form purchase order terms express obligations upon suppliers to comply with all applicable anti-modern slavery laws and Micro Focus' Modern Slavery Statement
- Providing our suppliers with our policies on preventing modern slavery and requiring compliance in all parts of their business;
- Also requiring suppliers to take all reasonable steps to ensure that slavery, servitude, human trafficking, forced labour and child labour do not take place in their own supply chains; and
- Requiring suppliers to immediately notify Micro Focus if they become aware of any such circumstances.

Policies

The following policies are in place at Micro Focus to minimise the slavery or human trafficking risk in all parts of our business and supply chains:

Code of Conduct

Micro Focus' worldwide Code of Conduct outlines our commitment to observing the highest ethical standards to guide our business practices across a number of areas, including in relation to human rights. It states that we must protect and respect human rights and work with our business partners and suppliers to do the same.

The Code of Conduct contains the following key obligations on employees relating to the prevention of slavery and human trafficking:

- Ensure that slavery, servitude, child labour, prison or forced labour, human trafficking and physical punishment do not occur in any operation of Micro Focus or our suppliers and other business partners;
- Comply with the Micro Focus Anti-Slavery and Human Trafficking Policy (see below);
- Respect the right of employees to organise in labour unions and collectively bargain in accordance with local laws and established practices; and
- Speak up if employees are concerned about any possible violation of human rights at Micro Focus.

The Code of Conduct has been communicated to all our employees (including through annual, dedicated online training). It is also reviewed each year (with the last review taking place in December 2020).

Anti-Slavery and Human Trafficking Policy

Our Anti-Slavery and Human Trafficking Policy outlines our zero-tolerance approach to slavery and human trafficking and states that modern slavery is a crime and a violation of fundamental human rights. It sets out that we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery in our own supply chain.

As with the Code of Conduct, the Anti-Slavery and Human Trafficking Policy applies to everyone working for or on behalf of Micro Focus and encourages employees to report any concerns immediately. Our Anti-Slavery and Human Trafficking Policy was last reviewed in August 2020.

Global Human Rights Policy

Micro Focus' Global Human Rights Policy confirms that respecting human rights is a core value at Micro Focus and is embedded in the way we do business. Micro Focus seeks to comply with all relevant legislation as well as uphold and respect human rights as reflected in the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact and the UN Guiding Principles on Business and Human Rights, amongst others.

These standards include ensuring that the rights of women and minority groups are protected and that employees are able to exercise their right to freedom of expression. We expect our employees, agents, suppliers and business partners to support and respect the protection of human rights in line with our own ethical values and apply the same high standards to all company operations, regardless of geographic location.

Supplier Code of Conduct

Our relationships with our suppliers are required to be fully transparent, ethical and in line with the standards expected of our own employees. To this end, we have a Supplier Code of Conduct, which includes details of our standards on issues such as slavery, human trafficking, forced labour and child labour, which is implemented across the Micro Focus group worldwide.

The Supplier Code of Conduct states that 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 their own supply chains or in any part of their business (including making all necessary enquiries with their own suppliers and, to the extent reasonable, other parties in the supply chain). It sets out that suppliers shall comply with the Modern Slavery Act, the commitments in this statement and the Anti-Slavery and Human Trafficking Policy, as updated from time to time.

Anti-Bribery and Anti-Corruption Policy

Micro Focus' Anti-Bribery and Corruption Policy requires that our business is conducted in an ethical, legal and responsible manner, consistent with our zero-tolerance of slavery and human trafficking in all forms.

Whistleblowing Policy

Our Whistleblowing Policy encourages a culture of openness and transparency across the business so that staff and our suppliers can speak up where they feel our people and customers are at risk, or where areas of wrongdoing have been identified or are suspected. For the purposes of the Whistleblowing Policy, "wrongdoing" includes endangering the health and safety of any individual and a breach of the Code of Conduct and the rest of our policies.

The Whistleblowing Policy explains how to raise a concern, including by staff speaking to their manager, their manager's manager or relevant head of department. Staff and suppliers can also contact the Micro Focus Legal Department or, if anonymity is preferred, use the independent telephone and web reporting service at the following link: <http://www.microfocus.ethicspoint.com/>. Micro Focus' Legal Department monitors and reviews the Whistleblowing reporting on an ongoing basis to identify behavioural trends and address any concerns raised.

We expect our robust ethical standards and behaviours to apply to and be upheld by all our employees, customers, partners, suppliers and other stakeholders.

Due Diligence

At Micro Focus, we aim to be a company with the highest level of ethical standards in how we treat our employees and do business with our partners, customers and suppliers. In pursuit of this aim, we implement and enforce rigorous standards in our relationships with our customers and partners and apply stringent due diligence requirements when entering into any new association to prevent inappropriate, illegal or corrupt behaviours or activities.

Environmental, Social and Governance (ESG)

Micro Focus holds ISS Prime Status, which is only awarded to companies with an Environmental Social & Governance ("ESG") performance above the sector-specific prime threshold. This means that we fulfil ambitious absolute performance requirements, showing our commitment to driving the highest ethical and business standards.

Social responsibility and the respect for human rights is also a core value at Micro Focus and shapes our behaviours, decision-making and culture. We have evolved and grown our social impact goals to focus on skills, which in turn will decrease the risk of slavery and human-trafficking through better education. Communities must be equipped with the right skills to survive and thrive in our continually evolving digital future. From helping to provide basic education in developing countries and nurturing digital skills in advanced economies, to social mobility, inclusion and diversity, our aim is to ensure that no one is left behind. Our partnerships and new employee volunteering programs focus on learning and upskilling for our communities and employees spanning digital, lifelong learning and wellbeing skills. This will help those communities to have access to professional jobs so that slavery and human-trafficking risk is less likely.

As well as helping our customers address their carbon footprint and adopt carbon friendly IT strategies, such as enabling greater efficiency and longer life from their existing technology, Micro Focus is committed to improving its own carbon footprint. Collectively our leadership team and employees are working to reduce our total energy

consumption and waste materials so that our employees and others can benefit from living in a better, safer and healthier environment.

As a UK-incorporated company listed on the London Stock Exchange, we are also required to comply with the UK Corporate Governance Code. The Code requires boards to (i) ensure that workforce policies and practices are consistent with the company's values and support its long-term sustainable success, and that the workforce can raise any matters of concern; and (ii) to assess and monitor the company's culture and, if it has concerns, to seek assurance that management has taken corrective action. Our Board of Directors is committed to driving and supporting a culture of ethical behaviours, which reduces the risk of any slavery and human-trafficking happening at Micro Focus or in its supply chains. For more information on our Corporate Social Responsibility ("CSR") initiatives, please see [here](#).

Training

Information on the importance of avoiding modern slavery is specifically included in our Code of Conduct and related training. In 2020, we conducted our annual Code of Conduct training, which is mandatory for all employees, including our Sales, Marketing, Legal, Procurement and Finance teams. The training addresses how to avoid any form of slavery and human trafficking, and it includes a test at the end which all employees are required to pass. It is also available in the following languages to ensure easy accessibility: Chinese, Dutch, English, French, Italian, Japanese, Portuguese, Russian and Spanish.

The Code of Conduct training repeats the message that Micro Focus is committed to acting ethically and with integrity in all its business relationships. It states that slavery includes forced labour, human trafficking and bonded labour (when people borrow money they cannot repay and are required to work to pay off the debt). It sets out that slavery has no place anywhere in our business or supply chains and provides a link to this statement and the Anti-Slavery and Human Trafficking Policy.

Responsibility and Monitoring

The Board of Micro Focus International Plc has overall responsibility for ensuring that the Micro Focus worldwide Code of Conduct and this statement comply with our legal and ethical obligations and that all those under Micro Focus' control comply with it.

Our Group Compliance Officer, supported by the Legal Corporate Compliance and Ethics team, has primary and day-to-day responsibility for monitoring the Code of Conduct and this statement's use and effectiveness. The Legal Corporate Compliance and Ethics team is also assisted by the wider Legal, CSR, Human Resources, Finance and Global Procurement teams in ensuring the company's compliance with both the letter and spirit of the Modern Slavery Act and this Statement.

Reporting

To date, Micro Focus has not identified or received any reports that it has caused or contributed to slavery or human trafficking in any way.

Should any issues be identified in relation to slavery or human trafficking, we have appropriate processes in place throughout the company to enable remediation. These processes include Micro Focus' Whistleblowing Policy, embedded in the Code of Conduct, and related whistleblowing telephone and web reporting service (<http://www.microfocus.ethicspoint.com/>). These mechanisms allow people to safely raise concerns about the impact Micro Focus or other entities in our operations or supply chain may be having on them.

Further Steps

Micro Focus will continue to review the effectiveness of the steps we are taking to ensure the risks of modern slavery and human trafficking in our business, operations and supply chain remain low. Where necessary, we will aim to improve any policies, procedures and systems that are already in place.

Signature:



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CEO