
MICRO FOCUS

Global Human Rights Policy

Contents

Contents	2
1. Scope and Application	3
2. Policy	3
3. Implementation.....	3
4. Anti-Slavery and Human Trafficking.....	4
5. Supply Chain Ethics	4
6. Community and Stakeholder Engagement	4
7. Breaches and Reporting	4
Revision History.....	5

1. Scope and Application

Human rights are the fundamental rights, freedoms and standards of treatment to which all people are entitled. 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 upholding and respecting 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.

This Policy focuses on the areas that have been identified as priorities for our business and broadly defines how Micro Focus, employees, contractors, suppliers and business partners will respect human rights in relation to our operations.

2. Policy

Micro Focus will in practice:

- Support and respect the protection of human rights and require our business partners and suppliers to do the same;
- Comply with all applicable laws and regulations where Micro Focus does business;
- Respect the right of employees to organise in labour unions and collectively bargain in accordance with local laws and established practices;
- Provide access to independent grievance mechanisms in order for employees to raise concerns;
- Create a working environment free from discrimination and harassment;
- Promptly investigate allegations concerning human rights and pursue action to mitigate any adverse human rights impacts; and
- Report transparently on our efforts.

3. Implementation

Micro Focus has several policies and procedures which, when taken in conjunction, help to promote respect for human rights.

Micro Focus' Code of Conduct represents the highest level of guidance for our employees. It sets non-negotiable global expectations for our behaviors, decisions and actions and defines how we embed integrity, respect and fairness into business operations. The Code of Conduct promotes respect for human rights through guidance on a wide range of subjects, including human rights and anti-slavery, safe and respectful working environments, anti-bribery requirements, data privacy, responsible marketing and environmental stewardship.

Training on the Code of Conduct is mandatory and includes links to relevant policies, as well as questions and answers, key tips and practical guidance. Within Micro Focus, managers are responsible for ensuring adherence to our personnel policies and guidelines.

Micro Focus supplements the Code of Conduct with more specific policies such as its:

- Anti-Bribery and Corruption Policy;
- Anti-Slavery and Human Trafficking Policy;
- Whistleblowing Policy;
- Information Security Policy and Data Protection Policy;
- Equal Opportunities Policy, Anti-Harassment and Anti-Bullying Policy; and
- Environment, Health and Safety Policy.

4. Anti-Slavery and Human Trafficking

Micro Focus has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in all its business dealings and relationships.

Accordingly, Micro Focus has prepared an Anti-Slavery and Human Trafficking Statement and Policy that disclose information on its efforts to address the risk of human trafficking and slavery in its supply chain. All of Micro Focus' contractors, suppliers and other business partners are required to meet the same high standards expected of our employees. Information on modern slavery is also included in our company-wide Code of Conduct and related training.

5. Supply Chain Ethics

Micro Focus is keen to ensure that its values are reflected in the way we do business with third parties, including our business partners and suppliers. Our procurement practices include additional requirements relating to modern slavery and human trafficking, such as appropriate clauses on modern slavery in supplier contracts. In addition, Micro Focus is also in the process of implementing the following:

- Supplier Code of Conduct, which establishes standards expected of our suppliers to ensure that working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically; and
- Partner Code of Conduct, which requires business partners to maintain high standards of business ethics and become familiar with and comply with all laws and regulatory changes that are relevant to their Micro Focus Partner status, including the UK's Bribery Act 2010 and the United States Foreign Corrupt Practices Act.

6. Community and Stakeholder Engagement

Micro Focus integrates Corporate Social Responsibility considerations, especially those relating to social, ethical, health, safety and environmental issues, into our day-to-day operations. The Management Team acknowledges its duty to ensure the company conducts its activities responsibly and with proper regard for all its stakeholders, including employees, shareholders, business partners, suppliers and local communities.

Please see our dedicated Corporate Social Responsibility web-page for more information on recent activity in this area.

7. Breaches and Reporting

If you believe or suspect that a breach of this policy has occurred or may occur in the future or have any concerns relating to this policy you should report this to Micro Focus as soon as possible. Reports should be made to the Legal Team or your designated Micro Focus representative (if applicable) using the options set out below. All reports will be handled as confidentially as possible.

- By email: 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://secure.ethicspoint.eu/domain /media/en/gui/104674/index.html>

Revision History

Revision	Description of Change
10 Jul 2019	Initial Release
28 Jan 2020	Updated owner

Department:	Legal	Policy Number:	Micro Focus-Legal-v 1.1
Sponsor:	Jane Smithard General Counsel	Last Revision:	28 Jan 2020
Owner:	Faustino Obeso	First Effective Date:	10 July 2019
Email:	Faustino.obeso@microfocus.com	Last re-validation Date:	