



## Palo Alto Networks Statement Under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

### Introduction

This joint statement (the “**Statement**”) is made on behalf of Palo Alto Networks (Canada) Inc. and its controlling entity<sup>1</sup> (together, the “Reporting Entities”) in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the most recently completed fiscal year ended July 31, 2023. The Reporting Entities are each a member of a corporate group of companies that operate worldwide and are collectively known as Palo Alto Networks (“Palo Alto Networks”, the “Company”, “we” or “our”).<sup>2</sup>

At Palo Alto Networks, our vision is a world where each day is safer and more secure than the one before.

Palo Alto Networks is committed to ensuring that our supply chain is free from forced labour and child labour. We believe in upholding the human rights of all workers and treating workers with dignity and respect. We do not tolerate or accept use of forced or child labour in our supply chain. We have implemented a number of policies in support of the protection of human rights, which can be found on our website [here](#). We have also implemented numerous internal policies at the global and local level, including local work rules, ensuring our employees know of our commitments and the various avenues available to them to raise concerns.

### Structure, operations, and supply chain

Palo Alto Networks was incorporated in 2005 and is headquartered in Santa Clara, CA. As of the end of the fiscal year, which ended on July 31, 2023, the Company had approximately 13,948 employees located in over 30 countries. In Canada, the Reporting Entities employ approximately 145 employees.

We provide cybersecurity software services and industry leading lines of security hardware that empower enterprises, organizations, service providers, and government entities to protect themselves against today’s most sophisticated cyber threats. Our cybersecurity platforms and services help secure enterprise users, networks, clouds, and endpoints by delivering comprehensive cybersecurity backed by industry leading artificial intelligence and automation. We are a leading provider of zero trust solutions, starting with next-generation zero trust network access to secure today’s remote hybrid workforces and extending to securing all users, applications, and infrastructure with zero trust principles. Our security solutions are designed to

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<sup>1</sup> Palo Alto Networks International, Inc.

<sup>2</sup> All operating entities under the Palo Alto Networks group of companies share the same core business operations and supply chains as well as the modern slavery policies, processes and risks further described in this statement. The same practices and procedures regarding responsible business and core ethics and compliance requirements apply to all global subsidiaries, affiliates, and related entities.

reduce customers' total cost of ownership by improving operational efficiency and eliminating the need for siloed point products.

We outsource the manufacturing of our products to various manufacturing partners, including our electronics manufacturing services provider (“EMS provider”) and original design manufacturers. Our providers assemble our products using design specifications, quality assurance programs, and standards that we establish, and procure components and assemble our products based on our demand forecasts. Palo Alto Networks and our partners source component parts within our hardware products from more than 300 suppliers within 30 countries across Asia, North America, and Europe. Our operations also include design and product development, supply chain management, marketing, sales, customer support, and administrative operations.

## Risks of modern slavery and actions taken to assess and reduce risks

To help assess and mitigate the risks inherent in our supply chain, Palo Alto Networks has implemented a Conflict Minerals Policy and attendant Conflict Minerals program, using leading industry developed tools from the Responsible Minerals Initiative to help track specific minerals from the mine to the smelter or refiner. We conduct annual surveys to minimize risk associated with use of components from regions with highest known risks of modern slavery and forced labor. We use due diligence and risk monitoring tools designed to notify us of credible public allegations and concerns relating to modern slavery and forced labor use by companies within our supply chain. We require suppliers to certify their adherence to and fidelity with Palo Alto Networks' Global Supplier Code of Conduct. Where applicable, our suppliers must also verify their compliance with the Responsible Business Alliance (the “RBA”) Code of Conduct. We work to effectuate positive change within our supply chain by using relevant information and certifications to encourage improvements and remediation of behaviour that falls short of our expectations, removing vendors and suppliers who fail to meet our high-standards and expectations as necessary.

Palo Alto Networks supports the United Nations Global Compact and the protection of internationally proclaimed human rights and labour standards. In furtherance of our commitment, Palo Alto Networks is an Affiliate Member of the RBA and adheres to the RBA Code of Conduct. Our Global Supplier Code of Conduct requires our supply chain partners to support this initiative and requires our suppliers to:

- 1) strictly prohibit human trafficking;
- 2) ensure all employment or services are freely chosen;
- 3) strictly prohibit child labour;
- 4) ensure workweeks are not excessive and are in compliance with local law;
- 5) pay compensation in accordance with local law;
- 6) ensure there is no harsh or inhumane treatment of its workers;
- 7) ensure a workforce free of harassment and unlawful discrimination;
- 8) provide freedom of association for all workers, in conformance with local law;
- 9) implement and maintain an occupational health and safety program; and
- 10) implement a grievance mechanism to allow workers to report concerns.

Palo Alto Networks employees receive annual training on our Code of Business Conduct and Ethics. The training establishes and makes clear our expectations that all employees comply with the Code of Business Conduct and Ethics, which includes relevant provisions on protection of human rights and treatment of workers, including strict prohibition on modern slavery and forced labour. In addition, employees involved in hardware sourcing receive regular periodic training to maintain and enhance their knowledge of applicable global regulations and best practices. This may include, but is not limited to, attending webinars, roundtables, and conferences, or reviewing internal and external training materials.

## Due diligence processes and remediation

Palo Alto Networks takes a risk-based approach to due diligence, focusing resources on sector and geographic specific risks, incorporating an annual questionnaire that requires disclosure of certain labour practices and policies, and the use of continuous due diligence and risk monitoring tools to help identify red flags relating to potential failures of vendors and suppliers to abide by their modern slavery and forced labour obligations.

Palo Alto Networks maintains a culture of open communication and encourages anyone with a good-faith concern to speak up without fear of retaliation. We have implemented multiple internal and external communication channels to make it convenient for employees, business partners, and members of our community to ask questions, provide feedback, or report concerns. As outlined above, we require the same from our suppliers. Palo Alto Networks is committed to investigating any credible report of potential modern slavery and forced labour or other applicable Code of Conduct violations in a fair, consistent, comprehensive, and objective manner. In line with our core beliefs, we confirm that we will take all appropriate and necessary steps to rectify any confirmed incidences of modern slavery and forced labor in our operations or supply chains.

In the fiscal year ending July 31, 2023, the Reporting Entities did not identify any forced or child labour and took no remediation measures. Similarly, the Reporting Entities have not identified any loss of income to vulnerable families resulting from the measures that they have taken to eliminate the use of forced or child labour in their operations or supply chains.

## Assessing the effectiveness of actions taken to address modern slavery risks

During this reporting period, Palo Alto Networks assessed the effectiveness of our actions through the information collected in its annual partner surveys, conversations with suppliers, and the tools we utilized to conduct due diligence and assess risk.

## Consultation

Palo Alto Networks is a well-integrated business. The same practices and procedures regarding responsible business and core ethics and compliance requirements apply to all global subsidiaries, affiliates, and related entities.

## Approval

This Statement is approved pursuant to subparagraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, by the board of directors of Palo Alto Networks International, Inc.

Kevin Espinola

Director of Palo Alto Networks International, Inc.

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*Kevin B. Espinola*

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I have the authority to bind Palo Alto Networks International Inc.

**May 2024**