

## PURE STORAGE

### STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

FY2024

Pure Storage is committed to corporate, social, and environmental responsibility, including ensuring its employees and suppliers take appropriate measures to help mitigate the risk of human trafficking and slavery within its global supply chain. Pure Storage does not tolerate forced labor, indentured labor, involuntary/child labor, or any other form of human trafficking by any Pure Storage supplier or for any purpose.

This Statement is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "**Canadian Act**"), the Modern Slavery Act 2018 (Cth) (the "**Australian Act**"), the Modern Slavery Act of 2015 (the "**United Kingdom Act**"), and the Transparency in Supply Chains Act of 2010 (the "**California Act**") for the financial year/reporting period ended 4 February 2024. The reporting requirements of the Canadian Act, the Australian Act, the United Kingdom Act and the California Act are summarized in the table attached as [Appendix 1](#).

#### 1. REPORTING ENTITY

Pure Storage, Inc. (USA) and each of its relevant controlled foreign subsidiaries (listed immediately below) are collectively referred to herein as '**Pure Storage**' and/or the '**reporting entity**' covered by this Statement:

- Pure Storage, Inc. (EIN 27-1069557) for the purposes of the California Act,
- Pure Storage, Inc. (ABN 97 281 568 551) and Pure Storage Australia Pty Ltd (ABN 86 164 489 794) for the purposes of the Australian Act,
- Pure Storage, Inc. and Pure Storage Canada Limited (BN 808214431) for the purposes of the Canadian Act, and
- Pure Storage, Inc. and Pure Storage UK Ltd (RN 08268206) for the purposes of the UK Act.

The terms '**we**', '**us**' and '**our**' refer to Pure Storage, except where context otherwise requires.

#### 2. STEPS TAKEN DURING FINANCIAL YEAR

To expand our focus on responsible sourcing, we implemented the following actions during the reporting period ("**Reporting Period**") of Pure Storage's fiscal year 2024, February 6, 2023 - February 4, 2024:

- **Policies:**
  - Updated our [Supplier Code of Conduct](#) to align with the Responsible Business Alliance ('**RBA**') Code of Conduct 8.0.

- Implemented a Sustainable Procurement Policy, illustrating our commitment to engaging with suppliers and further integrating sustainability into our procurement processes.
- **Policy acknowledgment:** 100% of our key strategic suppliers, which include contract manufacturing partners and other suppliers accounting for over 70% of our direct supply chain vendor spend, have acknowledged the new Supplier Code of Conduct or the equivalent RBA Code of Conduct.
- **Training:** Internally, over 70% of buyers and 100% of Supply Chain and Procurement Executives have completed training on Sustainability and Sustainable Procurement. Furthermore, all Pure employees receive training on our Code of Conduct and business ethics at onboarding, and all employees must review and re-certify compliance with our Code of Conduct and key policies every fiscal year.
- **Monitoring and auditing:** Our key strategic suppliers were assessed through the RBA and hold RBA Validated Assessment Program ('VAP') Silver certification, with zero critical corrective actions.
- **Monitoring and auditing continued:** We launched a pilot program, enabling our risk and compliance professionals to visit key strategic suppliers, engaging in follow-up discussions about VAP audit outcomes, governance, and compliance with ESG requirements; one key strategic supplier audit by our risk and compliance professionals was completed in the Reporting Period in addition to the aforementioned third-party RBA VAP site audits.
- **Depth of engagement:** Our engagement with suppliers expands beyond just first tier suppliers; contract acknowledgement, RBA VAP activities, and/or other ESG engagement cover several key component suppliers that supply our contract manufacturers.
- **Program review:** A large public consultancy performed an ESG related procurement program maturity assessment against leading practices (third party assessment).

### 3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### STRUCTURE

Pure Storage, Inc. (USA) is a public company listed on the New York Stock Exchange and has the following current general business structure:

- The Board consisting of:
  - Chairman and Chief Executive Officer
  - Founder and Chief Visionary Officer
  - Non-executive Board Member x 8
- The Executive Staff consisting of:
  - Chief Executive Officer
  - Founder and Chief Visionary Officer
  - Chief Product Officer

- Chief Revenue Officer
- Chief Administrative and Legal Officer

## OPERATIONS

Our corporate headquarters are located in Santa Clara, California. We also maintain offices and inventory depots in multiple locations in the United States and internationally in Africa, Asia, Australia, Europe, and North and South America.

Pure Storage has worked to redefine the industry with an unmatched data storage platform that helps organizations reduce the complexity, increase the reliability, mitigate the risks, and reduce the costs of their data infrastructure. Pure Storage's products principally consist of software and some related hardware solutions and technologies. Pure Storage's data solutions products enable SaaS companies, cloud service providers, and enterprise and public sector customers to deliver real-time, secure data to power their mission-critical production, DevOps, and modern analytics environments in a multi-cloud environment. One of the fastest growing enterprise IT companies, Pure Storage enables customers to quickly adopt next-generation technologies, including artificial intelligence and machine learning, to help maximize the value of their data for competitive advantage.

Pure Storage is an active member of the RBA, and has adopted the RBA Code of Conduct as the foundation of its Supplier Code of Conduct. The standards set out in the RBA Code of Conduct reference international norms and standards including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises, ISO and SA standards, and others. The RBA Code of Conduct requires its members to meet the strictest requirements between the code itself and laws and regulations, including prohibition of forced labor, child labor, involuntary prison labor, and human trafficking.

At Pure Storage, we recognize the profound impact that responsible sourcing and manufacturing has on our planet, communities, and the sustainability of our products. Pure Storage is committed to not just meeting but exceeding the evolving expectations of our stakeholders for a more sustainable and responsible global supply chain

## SUPPLY CHAIN

Pure Storage outsources all manufacturing operations to contract manufacturers. Our contract manufacturers manufacture, assemble, test and package our products in accordance with our specifications and are primarily located in the Americas and Eastern Europe. We provide our contract manufacturers with a rolling forecast for anticipated orders, which our contract manufacturers use to build finished products. The product mix and volumes are adjusted based on anticipated demand and actual sales and shipments in prior periods. We work closely with our contract manufacturers to meet our product delivery requirements and to manage the manufacturing process and quality control. We and our contract manufacturers are active

members of the RBA supporting continuous improvement in the social, environmental and ethical responsibility of our supply chain.

Our supply chain also includes the suppliers of products and services that would typically be required by offices for administration, sales and marketing, and research and development as well as inventory depots located around the world.

#### **4. IDENTIFICATION OF RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN**

##### **RISKS IN OUR OPERATIONS**

**Our internal processes have found no evidence of any modern slavery practices or incidents in our operations**, and we do not believe there is any material modern slavery risk in our operations and supply chain.

Pure Storage has pledged to respect human rights, covering topics such as forced labor, slavery, child labor, and human trafficking. We practice the principles embodied in the RBA Code of Conduct, which prohibits the use of forced labor, indentured labor, or involuntary/child labor and human trafficking. The RBA Code outlines requirements covering the absence of slavery and human trafficking, to include compliance with global labor standards and applicable laws (e.g. worker health and safety, the environment, business ethics). Our internal policies and practices such as our Code of Conduct require compliance with the RBA Code and are consistent with international labor and human rights standards.

##### **RISKS IN OUR SUPPLY CHAIN**

**We are not aware of any information which suggests that any of our suppliers had (or were aware of) any instances of modern slavery in their operations or supply chains .**

Pure Storage expects its suppliers' conduct to adhere to the highest ethical principles, as described in our Supplier Code of Conduct. We continuously engage with key manufacturing partners, components suppliers, and other partners to drive awareness of and alignment to our expectations.

Pure Storage requires adherence to RBA's governing principles with key strategic suppliers renewing business. Furthermore, during the Reporting Period and onwards, all suppliers are required to certify our Supplier Code of Conduct or equivalent via our onboarding questionnaire tool during the onboarding and screening process. We are also committed to complying with the changes to the U.S. Government's Federal Acquisition Regulation with regards to Combating Trafficking in Persons and expect our suppliers to similarly be in compliance. We work with our supply chain to create an environment where workers may freely choose employment. This focus on labor and worker rights is part of a larger effort around supply chain transparency and accountability.

## 5. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS INCLUDING POLICIES AND DUE DILIGENCE PROCESSES

### ASSESSMENT OF RISKS

Pure Storage is dedicated to ethical business practices globally, respecting human rights and adhering to all applicable laws and regulations.

We have implemented and embedded an ongoing program to try and continuously improve our visibility into the labor practices in our supply chain and our ability to identify, assess and address risks of modern slavery practices in our operations and supply chain (the “**Modern Slavery Risk Mitigation Program**”).

Our Modern Slavery Risk Mitigation Program is intended to be continuously reviewed and improved as time goes on and currently includes:

1. Policies and Statements: Our Statement Against Slavery and Human Trafficking, Business Code of Conduct, Sustainable Procurement Policy, Supplier Code of Conduct, and “Speak Up!” program. Each statement and policy specifically address our commitment to be vigilant regarding modern slavery issues, while the Speak Up program strongly encourages employees, suppliers, and other stakeholders to report all concerns and violations of Group policies. The program provides a clear mechanism via multiple channels to do so; and ensures there will be no negative repercussions for doing so.
2. Contract Language: Our Master Supply Agreement (“**MSA**”) template includes language requiring compliance to the RBA Code of Conduct, ensuring our key strategic suppliers align with the RBA requirements around human rights and forced labor and perform continuous monitoring. Management has approved a requirement in the MSA for new suppliers to comply with the Pure Storage Code of Conduct as well as the Pure Storage Supplier Code of Conduct. Key strategic suppliers are required to acknowledge and demonstrate their compliance with both Codes of Conduct during audits.
3. Audits: We utilize a multi-faceted audit approach, including third-party, Pure Storage led, and self-assessment engagement.
  - a. Third-party: The RBA VAP program performs audits across key strategic suppliers, including an assessment of risk areas and potential corrective actions, including human trafficking as a key topic area.
  - b. Pure Storage led: Pure Storage risk and compliance professionals additionally perform on-site audits at key strategic supplier sites.
  - c. Self-assessment: We also engage additional suppliers with the RBA assessment process (SAQ), which includes a self assessment of conformance with the RBA Code. This includes an assessment of the supplier’s policies and practices that may increase risks related to human trafficking.
4. Depth of engagement: Our list of key strategic suppliers includes several critical component suppliers that sell to our first tier suppliers, which increases the depth of our supplier engagement.

5. Onboarding/Screening: We perform a rigorous onboarding screening process to reduce the risk of engaging with unethical companies. Management has approved the enhancement of the supplier screening process to include an expanded assessment of modern slavery risk when a new supplier is identified and onboarded.
6. ESG Scorecard: Our quarterly evaluation of suppliers includes a ESG scorecard for key strategic suppliers, driving mutual engagement on their ESG journey,
7. Expanded training: Management has approved deployment of training for the Modern Slavery Risk Mitigation Program to ensure our employees have the knowledge and tools to identify and report risks, and we have mechanisms in place to hold our personnel and suppliers accountable.
8. To mitigate internal risks, Pure Storage undertakes a number of steps including:
  - Ensuring all employees receive employment contracts or offer letters detailing wages and work hours and are provided with payslips.
  - Ongoing engagement with employee representation groups.
  - Monitoring of changes in employment legislation related to compensation and working hours.
  - Maintenance of commercial agreements with contingent workforce providers, ensuring they uphold suitable policies, including a Human Rights Policy.

## ADDRESSING RISKS

Each reporting period, key actions are taken in connection with the Modern Slavery Risk Mitigation Program, with the Reporting Period summarized in Section 2. The following additional activity to address risks has also occurred:

- Screening: We have integrated a robust supplier screening process as part of our onboarding protocol including comprehensive due diligence and risk assessments across multiple domains, such as ethical business practices, diversity, data privacy, and information security. Those suppliers who did not respond to our due diligence inquiries will continue to be actively pursued until they complete a survey.
- RBA collaboration: We actively participate in the RBA, leveraging cross-industry collaboration to align suppliers with clear, consistent, and attainable standards. Our involvement with the RBA Validated Assessment Program ensures independent onsite verification of compliance across labor rights and other RBA Code of Conduct attributes through third-party audits. All our key strategic suppliers were covered by RBA VAP audits.

It is understood that we remain on a modern slavery risk identification and mitigation journey with our suppliers and expect to see our visibility into modern slavery risk in the supply chain improve and corresponding mitigation actions completed as we continue that journey. Our Modern Slavery Risk Mitigation Program has been designed – and will continue to be refined – with that in mind and with a view to “bring along” our entire supply chain with us on that journey to the greatest extent feasible.

## 9. REMEDATION MEASURES



As there have been no known instances of modern slavery identified in our business operations and/or supply chain, remediation measures for any forced labour or child labour or for loss of income to the most vulnerable families are currently not applicable.

## **10. TRAINING AND ACCOUNTABILITY**

Pure Storage is passionate about maintaining the highest standards of business conduct and ethics, guided by this Code of Conduct. All Pure Storage employees complete a Code of Conduct and business ethics training during their onboarding process. Furthermore, all Pure Storage employees annually recertify their review and acknowledgement of six key policies, including the Code of Conduct, which includes topics such as Respecting Human Rights, Environmental Stewardship and Responsibility, Anti-discrimination, Diversity, and a Safe Working Environment. The Code of Conduct is available in 10 different languages.

As part of additional annual training, buyers and leadership of the Supply Chain and Procurement teams are assigned to complete Environmental, Sustainability, and Governance training. During the Reporting Period, 100% of Supply Chain and Procurement executives, and over 70% of our buyers completed the materials. Pure Storage has developed and implemented two courses to cover these topics - Sustainability as well as Sustainable Procurement. Our expectations around compliance with labor laws, human rights, and the RBA Code / our Supplier Code of Conduct are highlighted in these materials. During our next reporting period (Pure Storage's current fiscal year) we have enhanced the content of these training courses to include additional anti-human trafficking and modern slavery guidance. Should any policy breaches be detected, personnel would be subject to our progressive discipline procedures, up to and including termination of employment. Suppliers that breach their contractual commitments to the Modern Slavery Risk Mitigation Program could be subject to losing their contracts and payment of damages.

## **11. HOW THE EFFECTIVENESS OF ACTIONS TAKEN IS ASSESSED**

Pure Storage is implementing key performance indicators (“KPIs”) to measure how effective our actions to assess and address modern slavery practices in any part of our operations and supply chain have been. KPIs include:

- RBA VAP audit scores of all key strategic suppliers,
- Training metrics for relevant Pure Storage functions,
- Operations notifications- reported issues in business operations;
- Our ESG certification scores and recognition for Human Rights and Responsible Sourcing (e.g. Ecovadis),
- Our key strategic supplier ESG Scorecard results,
- 100% certification of Pure Storage's Supplier and Business Codes of Conduct or equivalent for all new suppliers at onboarding,

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions.

In addition to the KPIs, Pure Storage also takes qualitative evidence derived from the actions described above and reviews it to determine if the supply chain response seems to be having the intended effect and moving in the right direction.

## **12. CONSULTATION PROCESS**

During the Reporting Period this statement covers, we actively engaged and communicated with all members of Pure Storage in the development of this Statement.

All members of Pure Storage participated in providing the information relevant to their respective sites, operations and supply chains as required for the risk assessment actions noted above in this Statement, as well as consulting and/or liaising with respect to communications with the suppliers in their respective operational supply chains who were subject to a modern slavery due diligence review.

All members of Pure Storage will have accountability for execution of the action plans and standard actions relating to their respective suppliers and will be kept apprised of the activities and outcomes noted in this Statement.

## **13. OTHER RELEVANT INFORMATION**

In addition to continuing to take the actions indicated by our Modern Slavery Risk Mitigation Program and further embedding it into our company processes and culture, we will be considering ways we may enhance the program such as, for example, how we can effectively and feasibly expand the program to reach deeper into our supply chain to more entities beyond our first-tier suppliers.

Ensuring that modern slavery and human trafficking is not taking place anywhere in our supply chain, and especially at tiers beyond our direct (first-tier) suppliers, will likely remain a significant ongoing challenge for the foreseeable future. However, we have implemented a risk-based approach and are committed to achieving continuous improvement through the actions described in this Statement.

## **APPROVAL OF STATEMENT**

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, the governing body with legal authority to bind Pure Storage Canada Limited has approved this statement on May 29, 2024 and signed by an officer.

“In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”



Todd Wheeler

DocuSigned by:  
 Signature: Todd Wheeler  
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General Counsel Pure Storage Inc., VP Pure Storage Canada Limited

May 30, 2024

I have the authority to bind Pure Storage Canada Limited

For the purpose of the Australian Act, the principal governing body of Pure Storage Australia Pty Ltd has unanimously approved this Statement on May 29, 2024 and signed by a director.

For the purpose of the UK Act, this Statement has been approved by the board of Pure Storage UK on May 29, 2024 and signed by a director.

### Appendix 1

Table 1: Reporting requirements quick reference

Section of this report	Canadian Act	Australian Act	UK Act	California Act
1		(1) Reporting entity		
2	(1) Steps taken during previous financial year			
3	(2) Structure, activities, and supply chains	(2) Structure, operations, and supply chain	(1) Organisation structure and supply chains	
4	(4) Risk	(3) Risk		
5	(3) Policies and due diligence processes		(2) Policies and (3) due diligence processes	
5	(4) Steps to assess and manage risk	(4) Actions taken to assess and address risk	(4) Risk assessment and management	(1) Verification to evaluate and address risks

5				(2) Audits to evaluate
5				(3) Supplier certification of materials complying with local laws
6	(5) Measures to remediate any forced labour or child labour			
6	(6) Measures to remediate loss of income			
7	(7) Training		(5) Training	(4) Training
8	(8) How effectiveness is assessed	(5) How effectiveness is assessed	(6) Key performance indicators to measure effectiveness	(5) Internal accountability standards
9		(6) Consultation process		
10		(7) Other relevant information		