



## **Modern Slavery Statement for Financial Year Ending 29 March 2024 – Canada and United Kingdom**

This joint statement constitutes Veritas' statement regarding modern slavery and child labour ("Statement") under Canadian and UK legislation. This Statement is made pursuant to section 6(2) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2015 (Canada) and section 54 of the Modern Slavery Act 2015 (UK). The Statement sets out the steps that Veritas group companies (collectively, "Veritas"), including Veritas Technologies (UK) Limited and Veritas Canada Limited, have taken and continue to take to ensure that modern slavery, human trafficking or child labour is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Child labour is the use of children under the relevant legal age to provide services for Veritas. Veritas has a zero-tolerance approach to any form of modern slavery and child labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery or child labour taking place within the business or our supply chain.

This Statement relates to actions and activities of the Veritas UK and Canadian companies during the financial year 1 April 2023 to 29 March 2024.

### **Structure and Supply Chains**

#### Introduction: Veritas

Veritas provides enterprise data protection and availability solutions to numerous businesses across multiple industries. Veritas operates in more than 35 countries around the world and is headquartered in Santa Clara, California, U.S.A.

#### Our products

Veritas develops and delivers data protection, software defined storage and digital compliance solutions, in the form of physical appliances and on-premises and SaaS-based software applications, to businesses worldwide.

#### Global Manufacturing Supply Chain

Like many of our peers in the technology sector, Veritas relies heavily on our suppliers. We subcontract manufacturing, assembly, fulfilment, and spare parts services and have supplier facilities located worldwide (Ireland, USA, China, Singapore, Japan, Mexico, and Taiwan).

Our global supply chain, which includes activities related to the manufacturing and transportation of Veritas' physical products, contains four Tier 1 suppliers, managed by the Product Operations team.

"Tier 1 suppliers" are those ranked in our top 80 percent of direct suppliers by spend and contracted to provide service or material input for Veritas finished goods (appliances) or spare parts.

#### Supply Chain Governance

In 2016, Veritas became an Affiliate Member of the [Responsible Business Alliance \(RBA\)](#), an industry coalition dedicated to corporate social responsibility in global supply chains.

As RBA members, Veritas supports the rights and well-being of all workers and communities affected by its supply chain, as outlined in the [RBA Code of Conduct](#). In addition, Tier 1 suppliers are required to adhere to [Veritas' Global Supplier Code of Conduct](#) which describes standards and expectations for labour, health and safety, the environment and business ethics.

Veritas uses a comprehensive and robust supplier screening process that include questionnaires and assessments to ensure Veritas only uses suppliers that meet all of Veritas' expectations and legal requirements, as it relates to modern slavery and child labour.



In 2018, Veritas became Regular RBA Member, a designation reflecting improvements in the programme according to the RBA's strict set of social, environmental and ethical performance standards. This expanded membership level is helping the company further build compliance programs using RBA tools and ensuring that Veritas addresses issues and emerging risks in its supply chain.

### Training and Capacity Building

Veritas requires all employees undertake mandatory annual training on our ethics and Code of Conduct, which includes our commitment to human rights. Additionally, Veritas has an Office of Ethics and Compliance that oversees all matters related to the ethical business practices of Veritas, as well as Environmental, Social and Governance experts embedded within Veritas supply chain management.

Employees, suppliers and partners are informed about Veritas' independent hotline for reporting ethical concerns or breaches of the various Codes of Conduct. This hotline is available to the public in multiple languages via the Internet or telephone. Reports can be made anonymously if preferred.

The Office of Ethics and Compliance reviews the effectiveness of Veritas' compliance programme as well as the hotline and reporting systems, to ensure Veritas is operating in an ethical and compliant fashion.

### **Policies on Modern Slavery and Child Labour**

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Veritas Global Human Rights Policy

This policy sets out the organisation's stance on human rights, which mirrors the internationally recognised human rights and labour standards as proclaimed in various international arrangements. Veritas' Human Rights Policy reiterates Veritas' commitment to respecting the human rights for all individuals, including privacy rights, the advancement of diversity and the protection of children from exploitation. These values apply to all our global business practices.

- RBA Code of Conduct

In 2016, Veritas joined the Responsible Business Alliance (formerly known as Electronic Industry Citizenship Coalition) and voluntarily adopted the RBA Code of Conduct, which establishes standards to ensure that working conditions in the electronics industry or industries in which electronics is a key component and its supply chains are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

- Veritas Global Partner Code of Conduct

This code explains the way we behave as an organisation and how we expect our partners to act. The Veritas Partner Code of Conduct applies to all business partners involved in the distribution, resale, or commercialisation of Veritas products and services, either directly or indirectly. Any violation of this Partner Code may lead to the immediate termination of the agreements with Veritas. As a global leader in providing information management solutions, Veritas is committed to conducting business with the highest standards of integrity and in full compliance with applicable laws and we expect the same from any individual or entity authorised to conduct business on our behalf.

- Veritas Code of Conduct

Our [Code of Conduct](#) explains how we behave as an organisation and the manner in which we expect our employees to act. It directs and informs employees on how to comply with our company policies and various laws, which frame how we must conduct business.

- Global Anti-Corruption Policy

This policy applies to all employees of Veritas and represents our organisation's commitment to maintaining the highest standards of ethical conduct, integrity and accountability.

- Veritas Global Supplier Code of Conduct

This code explains the way we behave as an organisation and how we expect our suppliers to act. The Supplier Code of Conduct applies to all suppliers to Veritas. Any violation of this Supplier Code may lead to the immediate termination of the agreements with Veritas.

- Veritas Global Health and Safety Policy

This policy sets out Veritas' health and safety standards for how Veritas conducts business and protects its employees, contractors and visitors to Veritas sites.

## **Due Diligence Processes and Risk Assessment**

We have several mechanisms in place to address the risk and any occurrence of modern slavery and child labour in Veritas' operations, including undertaking due diligence activities in selecting new Tier 1 suppliers and periodic reviews of the suppliers' compliance efforts.

### Responsible Sourcing

Veritas embeds sustainability principles into its standard operating supply chain procedures for sourcing new suppliers. This approach helps give preference to suppliers who demonstrate better management of environmental, social and economic impacts within their production and supply processes. It also helps avoid suppliers whose practices are not aligned with Veritas' expectations.

### Contracting and Compliance

Veritas proposes Environmental, Social and Governance Requirements ("ESG Requirements") in its agreements with Tier 1 suppliers and implements procedures to enforce compliance with such provisions. Here is a summary of our efforts in sourcing, contracting and compliance activities:

Sourcing	Contracting	Compliance
<p>The <a href="#">RBA Code of Conduct</a> and the Veritas Supplier ESG Requirements are referenced at the first point of contact with suppliers through all Requests for Proposals/Quotations.</p> <p>Veritas carries out due diligence on suppliers at the pre-qualification stage.</p> <p>Suppliers are asked to complete an ESG Questionnaire that specifically addresses the risks of slavery and human trafficking and requests information about the due diligence mechanisms in place. This questionnaire informs our evaluation and rating of potential supplier partners.</p>	<p>We propose to our new Tier 1 suppliers to sign the Veritas Sustainability Agreement, which includes compliance with the RBA Code of Conduct and a commitment from the supplier that it will not engage in any form of human trafficking or slavery. As of 29 March 2024, 25% of Tier 1 suppliers signed the Veritas Supply Chain Sustainability Agreement. Of the other 75%, are RBA members and comply with the RBA Code of Conduct and processes.</p>	<p>We continually monitor suppliers for compliance with our expectations by reviewing the results of the <a href="#">RBA Self-Assessment Questionnaire (SAQ)</a> and through the <a href="#">RBA Validated Assessment Program (VAP)</a> and take remedial action as required.</p>

## Risk Assessment and Monitoring

We primarily focus our supply chain responsibility program on the engagement with Tier 1 suppliers, which we consider to be suppliers with most impact on our supply chain practices. We propose to our new Tier 1 suppliers to comply with the ESG Requirements, which include compliance with the [RBA Code of Conduct](#) and a commitment from the supplier that it will not engage in any form of human trafficking or slavery. While our contract agreements with our Tier 1 suppliers do not expressly address “materials” that the suppliers incorporate into products, Veritas asks our Tier 1 suppliers providing materials to Veritas to communicate the RBA Code of Conduct to the next tier of suppliers and to monitor those suppliers’ compliance with these requirements.

Tier 1 suppliers who had agreed to our ESG Requirements are asked to demonstrate their compliance with the RBA Code of Conduct, including implementation of a management system, self-assessments and audits by completing the [RBA Self-Assessment Questionnaire](#) (“SAQ”), the results of which are reviewed by Veritas. Acknowledgements of the RBA Code of Conduct are requested from such Tier 1 suppliers. If supplier sites show high risk on the SAQ, such supplier will be audited by a third party, and supplier sites demonstrating known risk factors for human trafficking will be investigated regarding those issues specifically and, depending on the outcome, may be audited as well. If deficiencies are identified, Veritas may work with the supplier to determine a remedial course of action.

To date, 100% of Tier 1 suppliers completed the RBA Self-assessment questionnaires (SAQ) and 25% of our Tier 1 suppliers agreed to comply with Veritas ESG Requirements. We had also ranked all of our Tier 1 suppliers for their compliance to the RBA. All of them were assessed low risk rating.

In addition, Veritas focuses its compliance efforts on responsible sourcing of minerals in its supply chains. Thus, as

part of our conflict minerals program, Veritas is a member of the Responsible Minerals Initiative (“RMI”). The RMI is one of the most utilized and respected resources for companies addressing issues related to the responsible sourcing of minerals in their supply chains. Veritas communicates its conflict minerals policy with our suppliers and require our suppliers to complete the CFSI’s Conflict Minerals Reporting Template (CMRT). In the financial year ending 29 March 2024, 100% of our Tier 1 suppliers responded to the CMRT.

## Eliminating the risk of child labour and modern slavery

Eliminating the risk of child labor and modern slavery in the supply chain is a crucial responsibility for Veritas. We take the following steps to prevent it:

### Establish Strong Policies and Commitments

- Developed a robust Human Rights policy that explicitly prohibits child labour and modern slavery. The policy aligns with international standards such as the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) conventions.
- Established a Supplier Code of Conduct that includes strict prohibitions against child labour and forced labour.
- Require all Suppliers to adhere to this Code and where possible this is included in contractual agreements.
- Required our Supply Chain Suppliers to comply with the RBA Code of Conduct.

### Conduct Due Diligence

- Mapped out the entire supply chain to identify potential risks related to child labour and modern slavery.
- Understand where raw materials are sourced and where manufacturing processes take place.
- Performed regular risk assessments through our RBA membership to identify high-risk areas and Suppliers.

### Monitoring Mechanisms

- Required our main supply chain Suppliers to complete a Supply Chain Due Diligence Assessment outlining their company’s position regarding forced labour and human rights.
- Built Supplier Capacity and Engage Stakeholders.
- Provided information to Suppliers to educate about the risks and signs of child labour and modern slavery.
- Developed a Supplier sustainability guide which provides clarity on Veritas’ specific reporting and compliance requirements, and highlights areas that provide an opportunity to collaborate for mutual benefit.

### Enhance Transparency and Reporting

- Publish annual reports where we disclose Supply Chain information to increase transparency and accountability.
- Engage stakeholders, including customers and investors, by providing clear information about sourcing practices and compliance measures.

## **Measuring Effectiveness**

Modern slavery is a hidden risk, making the evaluation of progress complex. We use the following performance indicators to monitor and report on the effectiveness of our policies and procedures in this area.

Key Performance Indicator (KPI)	Reason for KPI	Key Actions as of 1 April 2022
Number of site assessments (conducted following the RBA VAP process)	We explicitly investigate practices that could result in modern slavery conditions through our various engagements with our suppliers, e.g., audits, frequent supplier visits and RBA SAQ assessments.	0  Through our membership with the RBA, we are able to share assessments of common suppliers, increasing our visibility further down the supply chain and reducing audit fatigue on suppliers.  During financial year ending 29 March 2024, we did not conduct any manufacturing supplier audit.
Number of issues related to forced labour identified	By monitoring the number of issues identified, we can better adapt our policies and procedures.	0
Number of remedial actions taken in response to the forced labour issues identified	By monitoring the number of remedial actions taken, we gain greater confidence that our corrective plans are being actioned and any activity is investigated and eliminated.	0
Number of reports to Veritas <a href="#">Ethics Line</a> related to modern slavery concerns	By monitoring the number of reports made we can better adapt our policies and procedures. All reports are formally and robustly investigated.	0

## **Training and Awareness**

In the financial year ending 29 March 2024, employees with direct responsibility for supply chain management (Product Operations organization) completed training on recognizing human trafficking and slavery in the supply chain.

## **Ethics and Code of Conduct Training**

Veritas employees are required to take regular training on our ethics policies. Thus, our mandatory annual Ethics and Code of Conduct training and the familiarity with the Veritas Code of Conduct, are designed to increase employee awareness of how certain laws and company policies affect work responsibilities. This training also directs employees on how to avoid running into ethical issues when navigating commonly encountered business situations.



The fact that we have a Code of Conduct and programs to help our employees meet these standards of honesty, loyalty, concern for others and accountability, is also important to our external stakeholders such as our customers, partners, and investors, who frequently check if we have fulfilled these requirements as part of their due diligence used when working with Veritas.

### **Veritas Ethics Line**

Veritas' dedicated Ethics Line allows for the anonymous reporting of business conduct concerns, including conflicts of interest matters, asking ethics-related questions and submitting gifts, hospitality, and entertainment approval requests.

### **Additional Information**

More information about Veritas' Corporate Responsibility program, our supply chain sustainability efforts and our prior statements made pursuant to the Modern Slavery Act 2015 can be found as follows:

- Our most recent Environmental, Social, and Governance Report is available online [here](#).
- Our Supply Chain Sustainability data is available online [here](#).
- Our previous Veritas U.K. Modern Slavery Act Statements can be found [here](#)

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**Approval of this Statement**

This Statement was approved by the Veritas Technologies (UK) Limited Board of Directors on 31 May 2024.

This Statement was approved by the Veritas Canada Limited Board of Directors on 31 May 2024.





**Attestation**

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 Veritas Technologies (UK) Limited and Veritas Canada Limited, Modern Slavery Statement for Financial Year Ending 29 March 2024 – Canada and United Kingdom. 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.

I have the authority to bind the above-named entities.

A handwritten signature in blue ink, appearing to read "Ed Malysz". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ed Malysz  
SVP and General Counsel of Veritas Technologies LLC  
Director of Veritas Canada Limited

May 31, 2024