

# 2017

## VERITAS CONFLICT MINERALS REPORT



Veritas Technologies LLC

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**VERITAS TECHNOLOGIES LLC**  
**CONFLICT MINERALS REPORT**  
**FOR THE REPORTING PERIOD JANUARY 1 TO DECEMBER 31, 2016**

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This Conflict Minerals Report has been prepared by Veritas Technologies LLC (herein referred to, alternatively, as “Veritas,” “Company,” “we” and “our”). This Conflict Minerals Report for the reporting period January 1, 2016 to December 31, 2016 is prepared to comply with the final Conflict Minerals implementing rules (the “Conflict Minerals Rules”) promulgated by the Securities and Exchange Commission (“SEC”), as modified by SEC guidance issued on April 29, 2014 and the SEC order issued on May 2, 2014.

The Conflict Minerals Rules were adopted by the SEC to implement reporting and disclosure requirements related to Conflict Minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 as codified in Section 13(p) of the Securities Exchange Act of 1934. The Conflict Minerals Rules impose certain reporting obligations on SEC registrants whose manufactured products contain Conflict Minerals that are necessary to the functionality or production of their products. Conflict Minerals are currently defined by the SEC as cassiterite, columbite-tantalite (coltan), gold, and wolframite, or their derivatives, which the SEC has currently limited to tin, tantalum, tungsten and gold.

To comply with the Conflict Minerals Rules, we conducted due diligence on the origin, source and chain of custody of the Conflict Minerals that were necessary to the functionality or production of the products that we manufactured, or contracted to manufacture, to ascertain whether these Conflict Minerals originated in the Democratic Republic of Congo or an adjoining country (collectively, “Covered Countries”), and financed or benefited armed groups (as defined in Section 1, Item 1.01(d)(2) of Form SD) in any of these countries.

Pursuant to SEC guidance issued April 29, 2014 and the SEC order issued May 2, 2014, Veritas is not required to describe any of its products as “DRC conflict free” (as defined in Section 1, Item 1.01(d)(4) of Form SD), “DRC conflict undeterminable” (as defined in Section 1, Item 1.01(d)(5) of Form SD) or “having not been found to be ‘DRC conflict free,’” and therefore makes no conclusion in this regard in the report presented herein. Furthermore, given that Veritas has not voluntarily elected to describe any of its products as “DRC conflict free,” an independent private sector audit of the report presented herein has not been conducted.

## Company Overview

Veritas enables organizations to unlock the value of their information, with solutions designed to serve the world's largest and most complex heterogeneous environments. Veritas works with companies worldwide, improving data availability and revealing insights to drive competitive advantage.

## Products Overview

Veritas is a global leader in providing storage and systems management solutions to help our customers – from consumers and small businesses to the largest global organizations – secure and manage their information against more risks at more points. Our Company's unique focus is to eliminate risks to information, technology and processes independent of the device, platform, interaction or location. Veritas product overviews can be found at <https://www.veritas.com/product>

All tier one suppliers of physical products that Veritas contracts to manufacture are considered in-scope suppliers. These suppliers manufacture products in the following category: appliances.

## Supply Chain Overview

All of Veritas' product manufacturing is outsourced to subcontracted manufacturing and logistics partners. Our suppliers are located in North America, South America, EMEA and Asia. In 2016, Veritas sourced products from four suppliers, one of which did not manufacture products that contain Conflict Minerals.

## Conflict Minerals Analysis and Reasonable Country of Origin Inquiry

Based upon a review of our product categories and our reasonable country of origin inquiry ("RCOI"), we have concluded that:

- Our appliance products contain Conflict Minerals that are necessary to the production or functionality of such products; and
- We are unable to determine whether the Conflict Minerals present in such products originate in the Covered Countries.

## Design of Due Diligence Measures

Veritas designed its due diligence with respect to the source and chain of custody of the Conflict Minerals contained in its products based on the five-step framework set forth in the Second Edition of the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the supplements thereto.

## Due Diligence Measures Performed by Veritas

### *Step #1: Establish Strong Company Management Systems*

- Published our Company's responsible sourcing policy, the Conflict Minerals Policy, on our [CR website](#)
- Veritas' Conflict Minerals Team (the "Team") is responsible for Conflict Minerals due diligence, governance and reporting. The Team consists of representatives from Legal and Appliance Solutions Manufacturing, all of whom have experience and expertise with respect to the requirements of the Conflict Minerals Rules, and is supported by external consultants.
- To make training regarding Conflict Minerals compliance available to suppliers, Veritas refers suppliers to the [Conflict-Free Sourcing Initiative's \("CFSI"\) website](#) which contains Conflict Minerals training materials and resources for suppliers.
- Veritas' Conflict Minerals Policy has been made available to existing suppliers, and Veritas makes the Conflict Minerals Policy available to new suppliers as part of the new supplier on-boarding process. In addition, Veritas has incorporated a

- provision requiring compliance with the Conflict Minerals Rules and the Conflict Minerals Policy into new supplier agreements and existing supplier agreements.
- Pursuant to the Conflict Minerals Policy, concerned parties may contact Veritas regarding complaints related to Conflict Minerals compliance by using Veritas' Ethics Line at [ethicsandcompliance@veritas.com](mailto:ethicsandcompliance@veritas.com)
- All documentation and records, including all material communications with suppliers, are retained electronically for a period of five (5) years.

*Step #2: Identify and Assess Risk in the Supply Chain*

- Veritas maintains a Conflict Minerals Compliance Program (the "Program") that outlines the process for supplier due diligence and engagement.
- The Program includes the identification of the suppliers that provide inputs to Veritas' products that may contain Conflict Minerals. This analysis is performed on an annual basis, as well as through the ongoing supplier approval and onboarding process, with data obtained from the global supplier database.
- The Appliance Solutions Manufacturing Team works with Legal and Finance to determine the enterprise reporting entity for compliance purposes. This includes the determination of whether any of Veritas' subsidiaries, joint ventures, or acquired companies are in-scope or out-of-scope for the respective reporting year pursuant to the Conflict Minerals Rules.
- For out-of-scope entities, if the entity supplies Veritas in-scope entities with products that Veritas contracts to manufacture, then the entity is considered a supplier and is surveyed as part of the RCOI process.
- The—Electronic Industry Citizenship Coalition ("EICC")/Global e-Sustainability Initiative Conflict Minerals Reporting Template (the "Survey") is emailed annually by the Appliance Solutions Manufacturing Team to all in-scope suppliers along with an introductory email.

- On an annual basis, any new subsidiaries and joint ventures are evaluated for inclusion as an in-scope entity for the purposes of compliance with the Conflict Minerals Rules.
- For acquisitions, due diligence is conducted to determine whether the newly acquired organization is subject to the Conflict Minerals Rules.

*Step #3: Design and Implement a Strategy to Respond to Identified Risks*

- Veritas has designed a Due Diligence Decision Tree that sets forth steps to be taken to mitigate risk based on a supplier's Survey responses. Suppliers are ranked for risk, ranging from Low to High, based upon red flags and issues raised by suppliers' Survey responses (the "Risk Levels").
- All Suppliers regardless of Risk Level in 2016 were contacted via email with follow-up questions and/or requests.

*Step #4: Carry Out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain*

- As a downstream actor in the supply chain, we do not have a direct relationship with the smelters and refiners that process the Conflict Minerals that are present in our products, and for this reason, we rely on the CFSI to conduct third-party audits of smelters and refiners.

*Step #5: Report on Supply Chain Due Diligence*

- The Conflict Minerals Report is available on our [CR website](#).

## Supplier Survey Responses and Smelter and Refiner Information

Our Conflict Minerals due diligence yielded the following results:

- 100% of in-scope suppliers responded using the Survey.
- 25% of in-scope suppliers provide products that do not contain Conflict Minerals.

- 75% of in-scope suppliers provide products that contain one or more Conflict Minerals, of which:
  - 66% provide products that contain Conflict Minerals that originate from the Covered Countries; and
  - 34% are still in the process of investigating the origin of the Conflict Minerals contained in their products.
- 100% of in-scope suppliers have a Conflict Minerals policy in place, and 100% of such in-scope suppliers have made their policy available to the public.
- 34% of in-scope suppliers require their direct suppliers to be DRC conflict-free (as defined in the Survey).
- 66% of in-scope suppliers require their direct suppliers to source from smelters that are validated by an independent private sector audit firm.
- 100% of in-scope suppliers have implemented due diligence measures for conflict-free sourcing.

## Steps to Mitigate Risk

Veritas intends to take the following steps to mitigate the risk that its necessary Conflict Minerals benefit armed groups:

- Continue to engage with suppliers to obtain complete Surveys;
- Support the development of supplier capabilities to perform Conflict-Minerals related due diligence by the implementation of risk mitigation measures, as appropriate; and provide ongoing training regarding emerging best practices and other relevant topics to personnel responsible for Conflict Minerals compliance.

### FORWARD LOOKING STATEMENTS

Statements relating to due diligence improvements are forward-looking in nature and are based on Veritas' management's current expectations or beliefs. These



forward-looking statements are not a guarantee of performance and are subject to a number of uncertainties and other factors that may be outside of Veritas' control and that could cause actual events to differ materially from those expressed or implied by the statements made herein.

#### DOCUMENTS INCORPORATED BY REFERENCE

Unless otherwise stated herein, any documents, third-party materials or references to websites (including Veritas') are not incorporated by reference in, or considered to be a part of, this Conflict Minerals Report, unless expressly incorporated by reference herein.