

In 2010 the California Transparency in Supply Chains Act of 2010 (SB 657) was passed and went into effect January 1, 2012. This law requires large retailers and manufacturers doing business in the state of California and having annual gross worldwide sales of over \$100 million dollars to disclose their efforts to eradicate slavery and human trafficking from their supply chains.

Our commitment to human rights which covers topics such as forced labor, slavery, child labor and human trafficking is outlined in our own [Human Trafficking Policy](#), [the United Nations Global Compact](#), and the EEIC Code of Conduct. As a signatory to the United Nations Global Compact, Veritas has pledged to take action to align its operations with universal principles on human rights, labour, environment and anti-corruption. As an applicant member of [the Electronic Industry Citizenship Coalition \(EICC\)](#), Veritas has adopted the EICC Code of Conduct in our supply chain which prohibits the use of forced labor, including bonded, indentured labor or involuntary prison labor, human trafficking and child labor.

The [EICC Code of Conduct](#) contains specific requirements covering slavery and human trafficking and encompasses a broader vision than simply the elimination of human trafficking, to include compliance with global labor standards and applicable laws; worker health and safety; the environment; business ethics; and the management of internal systems and controls to ensure effective compliance.

## Verification

We primarily focus our supply chain responsibility program engagement on Tier 1 suppliers. Tier 1 suppliers are those with whom we have a direct contract in place AND the supplier is contracted to provide service or material input for Veritas finished goods (appliances) or services (i.e. spare parts).

We add Social & Environmental Responsibility and/or Conduct requirements to our Tier 1 suppliers' contracts. Our Social & Environmental Responsibility requirements include an agreement to implement the EICC Code of Conduct and a commitment from the supplier that it will not engage in any forms of human trafficking or slavery. Our Conduct requirements include a commitment from our Tier 1 suppliers to conduct business pursuant to the [United Nations Global Compact's Ten Principles](#), which include a commitment to eliminate slavery from the global supply chain.

Tier 1 suppliers are asked to demonstrate their compliance with the EICC Code of Conduct – including implementation of a management system, self-assessments, and audits – by completion of the EICC Self-Assessment Questionnaire (SAQ), the results of which are reviewed by Veritas. Acknowledgements of the EICC Code of Conduct are requested from all of Veritas Tier 1 suppliers.

## Audits

As an applicant member of the EICC, we conduct initial assessments of our top Tier 1 suppliers to identify the risks of non-compliance with the EICC Code of Conduct, including the actual or potential risks of slavery and human trafficking occurrences. Veritas will require audits, via a third party, if deemed necessary to verify our supply chain's conformance to the EICC Code of Conduct and related standards and policies. Third-party audits will follow the [EICC Validated Assessment Process \(VAP\)](#), which includes an assessment of the supplier's risks and controls regarding human trafficking. If non-conformance is identified, we will work closely with our suppliers to develop corrective action plans and close audit findings.

## Certification

Veritas has contract agreements in place with our Tier 1 suppliers providing materials to Veritas requiring them to comply with international standards and applicable laws and regulations regarding forced labor and human trafficking as specified in the EICC Code of Conduct. Veritas' Tier 1 suppliers certify that their operations comply with the laws regarding forced labor and human trafficking through their consent to the relevant terms and conditions in their agreements with Veritas. 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 EICC Code of Conduct to the next tier of suppliers and to monitor those suppliers' compliance with these requirements.

Certification from these Tier 1 suppliers of compliance with all applicable laws, including those related to freely chosen employment, are provided through the EICC Self-Assessment Questionnaire (SAQ). If supplier sites show high risk on the SAQ, they will be audited by a third party, and supplier sites demonstrating known risk factors for human trafficking will be investigated with regard to those issues specifically and, depending on the outcome, may be audited as well.

## Internal Accountability

As a member of the United Nations Global Compact Veritas is committed to respecting human rights and expects its employees, contractors, and suppliers to adhere to the Veritas Code of Conduct and Human Rights Policy.

We comply with U.S. government legislation known as FAR 52.222-50, "Combatting Trafficking in Persons," which codifies trafficking-related prohibitions for federal contractors and subcontractors.

Over the past year, we also worked to comply with the new UK Modern Slavery Act. The Act requires companies to issue a formal statement of how they are preventing human trafficking and slavery in their supply chains.

Veritas has a zero-tolerance policy and expects all employees and contractors to be well aware of the implications of violating any aspect of human-trafficking related activities. Employees and contractors can report potential violations of this policy to Veritas' EthicsLine.

## Training

Employees are required to take regular training on our Code of Conduct and ethics policies. We are in the process of updating our training to include human trafficking and slavery.

Beginning 2018, employees with direct responsibility for supply chain management will be required to complete training on recognizing human trafficking and slavery in the supply chain.

More information on Veritas's Corporate Responsibility Program can be found at: <https://www.veritas.com/about/corporate-responsibility>