Modern Slavery Act statement for financial year ending 30 March 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Veritas Technologies (UK) Limited (“Veritas” or the “Company”), as part of Veritas group companies has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Company has a zero-tolerance approach to any form of modern slavery. 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 taking place within the business or our supply chain.

This statement relates to actions and activities during the financial year 1 April 2017 to 30 March 2018.

The Company is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Our business

Veritas enables organizations to harness the power of their information, with solutions designed to serve the world’s largest and most complex heterogeneous environments.

We help organizations to get industry-leading solutions that cover all platforms with the portfolio of backup and recovery, business continuity, software-defined storage, and information governance products and services.

Due diligence

The Company undertakes due diligence activities when it considers taking on new Tier 1 suppliers (defined below), and regularly reviews its existing Tier 1 suppliers. The Company’s due diligence and review efforts include the following:

1) We primarily focus our supply chain responsibility program engagement with Tier 1 suppliers. “Tier 1 suppliers” are those with whom we have a direct contract in place AND who are contracted to provide service and material input for Veritas finished goods (appliances) or spare parts. We propose to our new Tier 1 suppliers to comply with the Corporate Social and Environmental Responsibility requirements (“CSR 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. Tier 1 suppliers who had agreed to our CSR Requirements are asked to demonstrate their compliance with the RBA Code of Conduct, including implementation of a management system, self-assessments and audits by completion of 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.

2) As a member of RBA, we conduct initial assessments of our top Tier 1 suppliers to identify the risks of non-compliance with the RBA Code of Conduct, including the actual or potential risks of slavery and human trafficking occurrences. Veritas will require audits to verify our supply chain’s conformance to the RBA Code of Conduct and related standards and policies. Our audits will follow the RBA Validated Assessment Process, 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 to finalize audit findings.
3) Veritas' Tier 1 suppliers who agree to our CSR Requirements certify that their operations comply with the laws regarding forced labor and human trafficking as specified in the RBA Code of Conduct. 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.

4) Certification from these Tier 1 suppliers regarding compliance with all applicable laws, including those related to freely chosen employment, are provided through the SAQ. 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 with regard to those issues specifically and, depending on the outcome, may be audited as well.

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

1) Veritas Anti-Human Trafficking Policy and Compliance Plan Notice: This policy sets out the organisation’s stand on human trafficking and how employees can identify any instances of this and where they can go for help. The Modern Slavery Act was added to the Policy in the financial year 2015/2016.

2) 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.

3) Veritas Partners Code of Conduct: This code explains the manner in which we behave as an organisation and how we expect our partners to act.

4) Veritas Code of Conduct: This code explains the manner in which we behave as an organisation and how we expect our employees to act.

5) Anti-Corruption Policy This policy applies to all employees of Veritas and represent our organisation's commitment to maintaining highest standards of ethical conduct, integrity and accountability.

6) Veritas Ethics Line: Allows anonymous reporting of business conduct concerns.

Training
Employees are required to take regular training on our ethics policies.

In December of 2017, employees with direct responsibility for supply chain management (Manufacturing, Supply Chain, Procurement organization) completed training on recognizing human trafficking and slavery in the supply chain.

More information about Veritas’s Corporate Responsibility Program and our environmental sustainability efforts can be found here:

https://www.veritas.com/about/corporate-responsibility
https://www.veritas.com/company/corporate-responsibility/sustainability
Our prior statements made pursuant to the Modern Slavery Act 2015 can be found here:

Financial year ending 31 March 2017
Financial year ending 1 April 2016

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Approval of this statement

This statement was approved by the Board of Directors on 28 September 2018.

Signed

[Signature]

Name: Paul Bolger  
Title: Director

Date: 28 September 2018