# Statement on Efforts to Combat Slavery and Human Trafficking

This statement describes Vertiv's ongoing efforts to combat and prevent human trafficking and modern slavery in its business operations and global supply chains. This statement is made for the year ended December 31, 2020, pursuant to Section 54 of the U.K. Modern Slavery Act 2015, California Transparency in Supply Chains Act 2010 and Section 13 of the Australian Modern Slavery Act 2018. To summarize, Vertiv has zero tolerance for human trafficking and slavery, has measures in place to ensure that Vertiv employees, agents and suppliers do not engage in human trafficking and slavery activities, and continually revises those measures to keep in step with relevant legislation.

# **ABOUT VERTIV**

Vertiv unites hardware, software, analytics and services to ensure customers' vital applications run continuously, perform optimally and grow with their business needs. Vertiv solves the most important challenges affecting today's data centers, communication networks, and commercial and industrial facilities with a portfolio of power, cooling, and IT infrastructure solutions and services that extend from the cloud to the edge of the network.



Vertiv is headquartered in Columbus, Ohio, USA, with regional offices in the United Kingdom, Italy, China, India and the Philippines. We have approximately 20,000 employees worldwide and provide products and services to customers globally. Our labor force is comprised of two categories: the first category includes personnel that physically contribute to the manufacturing and production of goods; the second category includes personnel engaged in administrative, organizational and management processes.

Vertiv's largest population of employees and our main manufacturing centers in the Asia Pacific region are in mainland China. On April 2, 2020, Vertiv's headquarters in Shenzhen, China, achieved SA8000 certification, in recognition of our global commitment to maintaining fair treatment, human rights and the highest social standards in the workplace.

Our supply chain is complex and includes more than 10,000 vendor partners in 115 countries providing Vertiv with manufactured components, raw materials, software, logistics support and services. Our suppliers vary by the nature of their business, size, location, type of workforce and scope of their upstream supply chain. Vertiv's supply chain is multi-tiered and we are typically many levels removed from mines, smelters, refiners and other activities which could be exposed to human trafficking risk.

However, in all categories of supply and services, Vertiv is committed to fostering long-term relationships with vendors who support Vertiv's commitment to responsible and ethical business practices.

#### VERTIV POLICIES REGARDING HUMAN TRAFFICKING AND SLAVERY

Vertiv is a member of the Slavery & Trafficking Risk Template (STRT) Development Committee of the Social Responsibility Alliance, a committee dedicated to the eradication of human trafficking and modern slavery from supply chains around the globe. In furtherance of this goal, we have incorporated the principles of the STRT into our human resources and supply chain policies, procedures and supporting standards, including the following:

 Human Rights Policy [publish policy to https://www.vertiv.com/en-us/about/ethics-compliance/#/tab-supply-chain and create link]

Our Human Rights Policy requires Vertiv to respect human rights in all its operations worldwide and aligns with the United Nations Global Compact and Universal Declaration of Human Rights. The policy articulates Vertiv's commitment to comply with all applicable laws and employment regulations in our operations and requires that our suppliers and business partners be required to do the same. Specifically, the policy states as follows:

- 1. We do not accept forced, bonded or indentured labor.
- 2. Involuntary or exploitative prison labor, slavery or trafficking of persons is prohibited.
- 3. It is prohibited to hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents.
- 4. We provide all employees, including those hired by recruiters, with detailed and accurate work contracts or similar work papers, prior to relocation in cases where the employee must relocate to perform the work, and in a language understood by the employee.
- 5. We do not charge employees any recruitment fees. When engaging recruiters, we will ensure that such recruiters and their subcontractors (i) do not charge the workers recruitment fees and (ii) comply with Vertiv's Code of Ethics, our Human Rights Policy, the local labor laws of the country in which the recruiting takes place, and the local labor laws of the country of employment.
- Code of Ethics [link to https://www.vertiv.com/en-us/about/ethics--compliance/#/tab-code-of-ethics ]

Vertiv's Code of Ethics outlines the actions and behaviors expected from every employee, officer, and director around the world on how we do business and strictly prohibits slavery and human trafficking in our global operations and supply chains.

 Supplier Code of Conduct [link to https://www.vertiv.com/en-us/about/ethics--compliance/#/tabsupply-chain]

Vertiv's Supplier Code of Conduct identifies the business ethics and human rights principles to which all our suppliers worldwide are expected to adhere and incorporate into their business operations. The Supplier Code of Conduct explicitly prohibits suppliers from engaging in any form of forced labor or discrimination and emphasizes the importance of humane treatment and a healthy and safe working environment. Our contracts with suppliers require them to comply with the Supplier Code of Conduct and all applicable laws and employment regulations where they operate, and further requires them to acknowledge acceptance of the Supplier Code of Conduct upon request of Vertiv.

 Conflict Minerals Statement [link to https://www.vertiv.com/en-us/about/ethics--compliance/#/tabsupply-chain ]

Our Conflict Minerals Statement draws on internationally recognized standards to advance social and environmental responsibility and declares Vertiv's ongoing efforts to end the human suffering and environmental impact associated with mining conflict minerals.

• Conflict Minerals Report [link to https://www.vertiv.com/en-us/about/ethics--compliance/#/tabsupply-chain , where will add our Conflict Minerals Report when it is published in May]

Our Conflict Minerals Report provides detailed information on Vertiv's compliance with Rule 13p-1 of the Securities Exchange Act of 1934, as amended, and our efforts to uphold responsible sourcing practices and maintain an effective due diligence program for the presence of conflict minerals in our supply chain. Vertiv requires that all materials used in its products be preferably sourced from conflict-free smelters or refiners.

The above-mentioned documents oppose, and we forbid our suppliers to use, any form of forced, bonded, or indentured labor. In support of this requirement, Vertiv takes the following specific actions to prevent and mitigate the risk of slavery and human trafficking in our supply chain:

#### 1. Verification

Vertiv evaluates, assesses and verifies the risk of human trafficking and slavery in our supply chain as part of our vendor monitoring and review process, and our supplier verification framework includes specific inquiries into human rights and anti-human trafficking efforts.

In 2020, Vertiv continued to partner with Assent Compliance (an internationally renowned and recognized third-party service provider) to gather data from suppliers and identify areas of potential risk. We used the following criteria to identify suppliers to include in the risk assessment:

- Location and country risk, as published by the U.S. Department of State in its Trafficking in Persons Report, with a focus on suppliers with operations in Tier 3, Tier 2 and Tier 2 Watch List countries (as defined by the U.S. Department of State)
- Vertiv's spend with the supplier (suppliers in Tier 3 with spend greater than \$50,000; suppliers in Tier 2 and Tier 2 Watch List countries with spend greater than \$100,000; and suppliers making up the top 50% of spend regardless of Tier)
- Potential connection to the Xinjiang province in China

Assent Compliance contacted the suppliers in 4Q 2020 and requested they complete and submit a Slavery and Trafficking Risk Template (STRT). In 2021, we will continue to collect and analyze supplier responses, identify additional suppliers for outreach, assess potential risk and take appropriate action.

#### 2. Audits

Vertiv participated in an independent audit by ISS Corporate Solutions that assessed Vertiv's performance related to labor rights and working conditions. We are using the results of the audit to improve our worldwide policies and procedures by incorporating specific anti-human trafficking concepts and increasing awareness.

As part of our vendor onboarding process, each of our suppliers of production materials must undergo an audit that requires their disclosure of policies related to ethics, compliance with law, labor rights and working conditions. Vertiv does not perform periodic or on-site audits of our suppliers to assess compliance with our Supplier Code of Conduct or human rights program.

#### 3. Certification

Our vendor onboarding procedure requires that new suppliers receive the Supplier Code of Conduct and we maintain a self-certification program that requires suppliers to formally acknowledge the Supplier Code of Conduct each year upon request. Further, our Master Purchasing Agreements and Terms and

Conditions of Purchase require suppliers to comply with all applicable laws and regulations, including those relating to human trafficking and slavery, and to furnish Vertiv a certificate of compliance upon request.

#### 4. Accountability

All Vertiv employees, officers and directors must adhere to our Code of Ethics and Human Rights Policy, and all suppliers are expected to adhere to our Supplier Code of Conduct.

Vertiv has a dedicated global procurement compliance team that monitors Vertiv's vendor base and regularly reports to senior management on our efforts to identify and eliminate the risk of human trafficking and slavery in our operations and supply chain.

Vertiv has implemented a toll-free, 24 hour-per-day reporting hotline available to all employees, suppliers, and customers worldwide to report any suspected violations of Vertiv's Code of Ethics or Supplier Code of Conduct, including any suspected violations of our policies against human trafficking and slavery. A supplier's breach of our Supplier Code of Conduct requires immediate corrective action and may include termination of the business relationship. To report an ethics concern or suspected ethical or legal violation, please file a report at: http://www.VertivCo.EthicsPoint.com

## 5. Training

Vertiv believes that each employee, officer and director is responsible for adhering to the Code of Ethics. To raise awareness of the Code and enforce its principles, we require all Vertiv personnel to sign the Code upon hiring and participate in an annual ethics training course. As part of our annual ethics training, our employees are required to acknowledge that they understand and will comply with the Code, and that they are aware that a violation could result in disciplinary action, up to and including termination. In addition, Vertiv provides training on our standards for labor rights and working conditions to all employees in human resources, health and safety, and those who engage with vendors and service providers in our supply chain. Our metric for success is 100% completion of all assigned training, including our annual ethics training and human rights training.

In cooperation with Assent Compliance, Vertiv provides its vendors with training resources and additional information about efforts to combat human trafficking and slavery and on Vertiv's anti-human trafficking, conflict minerals and Supplier Code of Conduct programs.

# **BOARD APPROVAL**

This statement has been approved by the board and signed by a director or officer of the following Vertiv entities as required by applicable law:

Entity	Date Approved	Signatory
Chloride Group Limited	April 8, 2021	M. O'Keeffe, Director
Geist Europe Ltd.	April 8, 2021	Z. Stein, Director
Vertiv Corporation	April 9, 2021	R. Wolfe, Director
Vertiv Group Corporation	April 9, 2021	R. Wolfe, Director
Vertiv Industrial Systems SAS		
Vertiv Infrastructure Limited	April 8, 2021	M. O'Keeffe, Director
Vertiv Integrated Systems GmbH	April 8, 2021	G. Moschetto, Director

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April 8, 2021	G. Albertazzi, Director	
April 16, 2021	P. Gattagrisa, Director	
April 22, 2021	R. Linsdell, Director	DocuSigned
	April 16, 2021	April 16, 2021 P. Gattagrisa, Director

ned by: >  $\Delta$ 9336A9E882F04BC... Robert Linsdell

Managing Director