

# Anti-Slavery

## Anti-Slavery Statement

Micro Focus International Plc makes this anti-slavery and human trafficking statement, as required by section 54(1) of the Modern Slavery Act 2015, setting out the actions that Micro Focus took during the financial year ended 31 October 2021, to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our business globally.

### Introduction and Purpose

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Modern Slavery Act") and describes the steps that Micro Focus took during its financial year ended 31 October 2021 to tackle modern slavery risks in our business and supply chains. Our efforts in this area represent a key component of our wider environmental, social & governance ("ESG") commitments.

For the purposes of this statement, the definition of modern slavery is based on the definitions set out in the Modern Slavery Act 2015 and includes, but is not limited to, slavery, servitude, forced labour, child labour, human trafficking, and workplace abuse.

This statement was approved by Micro Focus International Plc's Board of Directors on 30 March 2022 and is published on behalf of Micro Focus International Plc and its qualifying group companies. References to "Micro Focus", "we", "us", "our" or the "company" are to each of these entities.

### 1. Overview of Micro Focus

Micro Focus (LSE: MCRO, NYSE: MFGP) is one of the world's largest enterprise software companies with an annual revenue of \$2.9 billion. We help our customers achieve key outcomes so they can run and transform their business.

Micro Focus is headquartered in Newbury (United Kingdom) and the group has a presence in 48 countries worldwide, employing over 11,000 people. For more information visit [www.microfocus.com](http://www.microfocus.com).

#### Our Purpose

Micro Focus' purpose is to deliver mission-critical enterprise software that powers the digital economy. Our aim is to put sustainability and responsibility at the core of the way we operate. We continue to make progress in this area for the benefit of our stakeholders. Our new ESG

committee was launched in the summer of 2021 with the goal of ensuring we continue to embed ESG in the core of our operations and we continue to make improvements in this area.

#### Our Business

Micro Focus is a software company with a professional workforce. We operate in a manner and sector in which we do not consider our employees to be at a high-risk of slavery, servitude, forced labour, child labour, human trafficking, or workplace abuse.

In relation to our supply chains, we do not run a business involving intensive manual labour, nor do we operate any manufacturing facilities. Our supply chain broadly consists of contract and outsourced workers (mostly professional consultants), telephone-based support services and suppliers of goods and other services for our offices, such as stationery suppliers, caterers, office cleaners and marketing merchandise.

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to help ensure slavery, forced labour and human trafficking does not take place anywhere in our business, distribution, or supply chains.

Our operations are historically mainly office-based although, due to the COVID-19 pandemic, 97% of our staff transitioned to home working and Micro Focus continues to operate a flexible working environment whereby up to 90% of the workforce continue to work remotely.

## 2. Zero-tolerance of Modern Slavery

Micro Focus remains committed to maintaining zero-tolerance of any form of modern slavery in its business or supply chains. We operate a risk-based approach which includes clearly informing our suppliers of Micro Focus' obligations under the Modern Slavery Act and the ethical standards required of them.

We also continuously review our practices, systems, and controls in relation to our supply chains to further identify, assess and monitor potential risk areas and identify ways to further mitigate the risk of slavery and human trafficking occurring. For example, in view of the large, diverse, and growing body of evidence of the human rights violations being perpetrated in Xinjiang against the Uyghur Muslims, Micro Focus confirmed during the FY21 financial year that none of our vendors are registered in the region. See section 5: Risk Assessment and Due Diligence for more information.

We include requests for information on modern slavery and our supply chains in our Requests for Proposals. Some of the practices and controls that we have implemented consist of:

- Including in Micro Focus' standard form purchase order terms express obligations upon suppliers to comply with all applicable anti-modern slavery laws and Micro Focus' Modern Slavery Statement;
- Providing our suppliers with our policies on preventing modern slavery and requiring compliance in all parts of their business;
- Also requiring suppliers to take all reasonable steps to ensure that slavery, servitude, human trafficking, forced labour and child labour do not take place in their own supply chains; and
- Requiring suppliers to immediately notify Micro Focus if they become aware of any such circumstances.

### 3. Our Principles and Governance

At Micro Focus, behaving responsibly as an organisation (including preventing any type of slavery and human trafficking), both internally for our employees and externally within the marketplace, communities, and environment, is a fundamental principle for our operations around the globe.

We are proud of Micro Focus INSPIRE, our company wide ESG programme, which covers every aspect of the organisation, including how we manage relationships with employees, suppliers, customers, and local communities. Micro Focus has an ISS quality score rating of "1" in ISS ESG's social category, which is the highest social rating, with the category covering all relevant environmental, social, and governance related topics. Micro Focus also holds ISS Prime Status because of us fulfilling ambitious absolute performance requirements, demonstrating the value we place on our people and their wellbeing.

Social responsibility and respect for human rights are core values at Micro Focus and shape our behaviours, decision-making, and culture. Our partnerships and employee volunteering programmes focus on learning and upskilling for our communities and employees globally, and include digital, lifelong learning and wellbeing skills.

We believe that communities should be equipped with the right skills to survive and thrive in our continually evolving digital future. From helping to provide basic education in developing countries and nurturing digital skills in advanced economies, to social mobility, inclusion and diversity, our aim is to ensure that no one is left behind. An example of our outreach activities is Micro Focus INSPIRE India, which has helped nurture and enrich the lives of thousands of schoolchildren and students, helping many stay digitally connected to continue their education during COVID-19 lockdowns, and ensuring hundreds from deprived communities are supported with the right skills to thrive in their digital futures.

All these initiatives should help those communities to have access to professional jobs so that slavery and human-trafficking is less likely.

Micro Focus' Board of Directors is committed to driving and supporting a culture of ethical behaviours, which reduces the risk of any slavery and human-trafficking happening at Micro Focus or in its supply chains. Consistent with the UK Corporate Governance Code, which applies to us as a UK-incorporated company listed on the London Stock Exchange, the Board ensures that workforce policies and practices are in line with the company's values, support our long-term sustainable success, and enable our workforce to raise any matters of concern. The Board also continuously assesses and monitors the company's culture and, should it have concerns, would seek assurance that management has taken corrective action.

For more information on our ESG initiatives, please see the ESG page of our external-facing website [here](#).

#### 4. Anti-Slavery and Human Trafficking, and Related Policies

The following policies, all of which are available on our internal intranet for our employees, as well as on our external-facing website or on request, are in place at Micro Focus to minimise the slavery or human trafficking risk in all parts of our business and supply chains:

##### Code of Conduct

Micro Focus' worldwide Code of Conduct outlines our commitment to observing the highest ethical standards to guide our business practices across several areas, including in relation to human rights. It states that we must protect and respect human rights and work with our business partners and suppliers to do the same.

The Code of Conduct contains the following key obligations on employees relating to the prevention of slavery and human trafficking:

- Ensure that slavery, servitude, child labour, prison or forced labour, human trafficking and physical punishment do not occur in any operation of Micro Focus or our suppliers and other business partners;
- Comply with the Micro Focus Anti-Slavery and Human Trafficking Policy;
- Respect the right of employees to organise in labour unions and collectively bargain in accordance with local laws and established practices; and
- Speak up if employees are concerned about any possible violation of human rights at Micro Focus.

The Code of Conduct has been communicated to all our employees (including through annual, dedicated online training). It is also reviewed regularly, with the last review taking place during the FY21 financial year.

#### Anti-Slavery and Human Trafficking Policy

Our Anti-Slavery and Human Trafficking Policy confirms and describes our zero-tolerance approach to slavery and human trafficking and states that modern slavery is a crime and a violation of fundamental human rights. It sets out that we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery in our own supply chain. The Anti-Slavery and Human Trafficking Policy applies to everyone working for or on behalf of Micro Focus in any capacity (including staff members, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, and business partners) and encourages employees to report any concerns immediately.

#### Global Human Rights Policy

Micro Focus' Global Human Rights Policy confirms that respecting human rights is a core value at Micro Focus and is embedded in the way we do business. Micro Focus requires compliance with relevant legislation as well as to uphold and respect human rights as reflected in the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact and the UN Guiding Principles on Business and Human Rights, amongst others.

These standards include ensuring that the rights of women and minority groups are protected and that employees can exercise their right to freedom of expression. We expect our employees, agents, suppliers, and business partners to support and respect the protection of human rights in line with our own ethical values and apply the same high standards to all company operations, regardless of geographic location.

#### Supplier Code of Conduct

Our relationships with our suppliers are required to be fully transparent, ethical and in line with the standards expected of our own employees. To this end, we have a Supplier Code of Conduct, which sets out the standards which we require of our suppliers in relation to issues such as slavery, human trafficking, forced labour and child labour, which is implemented across the Micro Focus group worldwide.

The Supplier Code of Conduct requires suppliers to comply with the Modern Slavery Act, the commitments in this Anti-Slavery and Human Trafficking statement, and the Anti-Slavery and Human Trafficking Policy, as updated from time to time in order to ensure that slavery, servitude,

human trafficking, forced or compulsory labour and/or child labour do not take place in their own supply chains or in any part of their business. Suppliers are also required to make all necessary enquiries with their own suppliers and, to the extent reasonable, other parties in the supply chain.

#### Anti-Bribery and Anti-Corruption Policy

Micro Focus' Anti-Bribery and Corruption Policy requires that our business is conducted in an ethical, legal, and responsible manner, consistent with our zero-tolerance of slavery and human trafficking in all forms.

#### Whistleblowing Policy

Our Whistleblowing Policy encourages a culture of openness and transparency across the business so that staff and our suppliers can speak up where they feel our people and customers are at risk, or where areas of wrongdoing have been identified or are suspected. For the purposes of the Whistleblowing Policy, "wrongdoing" includes endangering the health and safety of any individual and a breach of the Code of Conduct and the rest of our policies. The Whistleblowing Policy explains how to raise a concern, including by staff speaking to their manager, their manager's manager, or relevant head of department. Staff and suppliers can also contact the Micro Focus Legal Department or, if anonymity is preferred, use an independent telephone and web reporting service (currently <http://www.microfocus.com/speakup>).

## 5. Risk Assessment and Due Diligence

#### Risk Assessment

Everyone at Micro Focus is encouraged to remain mindful of any slavery and human trafficking risks that may face the company, and to report and concerns using the appropriate channels immediately. As set out above, following the allegations of human rights violations against Uyghurs Muslim minorities taking place in the Xinjiang region of China, in February 2021 Micro Focus performed an assessment of suppliers in our procurement system to ascertain whether any had links to the Xinjiang region. As a result of this exercise, we were able to confirm that we do not have any suppliers with a registered office in this region.

#### Due Diligence

At Micro Focus, we aim to be a company with the highest level of ethical standards in how we treat our employees and do business with our partners, customers and suppliers. In pursuit of this aim, we implement and enforce rigorous standards in our relationships with our suppliers, customers and partners and apply stringent due diligence requirements when entering into any new association to prevent inappropriate, illegal or corrupt behaviours or activities. For example,

we screen prospective business partners to ensure that there are no red flags associated with the relevant partner from a compliance or modern slavery perspective.

## 6. Training and Awareness-Raising

Information on the importance of avoiding modern slavery and our own policies and procedures in this area is specifically included in our Code of Conduct annual online training. In 2021, we conducted our annual Code of Conduct training, which is mandatory for all employees, including our Sales, Marketing, Legal, Procurement and Finance teams. The training addresses how to avoid any form of slavery and human trafficking, and it includes a test at the end which all employees are required to pass in order to complete the training. It is also available in the following languages to ensure easy accessibility: Chinese, Dutch, English, French, Italian, Japanese, Portuguese, Russian and Spanish.

The Code of Conduct training repeats the message that Micro Focus is committed to acting ethically and with integrity in all its business relationships. It states that slavery includes forced labour, human trafficking and bonded labour (when people borrow money they cannot repay and are required to work to pay off the debt). It sets out that slavery has no place anywhere in our business or supply chains and provides a link to this statement and the Anti-Slavery and Human Trafficking Policy.

## 7. Responsibility, Monitoring, and Reporting

### Responsibility and Monitoring

The Board of Micro Focus International Plc has overall responsibility for ensuring that the Micro Focus worldwide Code of Conduct and this statement comply with our legal and ethical obligations and that all those under Micro Focus' control comply with it.

Our Chief Legal Officer, supported by the Legal Corporate Compliance and Ethics team, has primary and day-to-day responsibility for monitoring the Code of Conduct and this statement's use and effectiveness. The Legal Corporate Compliance and Ethics team is also assisted by the wider Legal, ESG, Human Resources, Finance and Global Procurement teams in ensuring our compliance with both the letter and spirit of the Modern Slavery Act and this statement.

### Reporting

To date, Micro Focus has not identified or received any reports that it has caused or contributed to slavery or human trafficking. Should any issues be identified in relation to slavery or human trafficking, we have appropriate processes in place throughout the company to enable

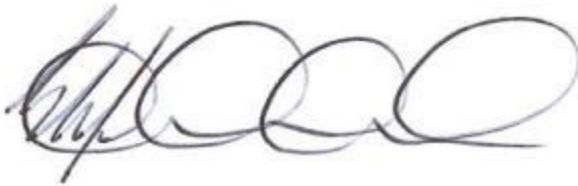
remediation including, as set out above, Micro Focus' Whistleblowing Policy and related whistleblowing telephone and web reporting service (<https://www.microfocus.com/speakup>).

## 8. Next Steps

Micro Focus will continue to review the effectiveness of the steps we are taking to ensure the risks of modern slavery and human trafficking in our business, operations and supply chain remain low. Where necessary, we will aim to improve any policies, procedures and systems that are already in place.

Approved by the Board of Micro Focus International Plc on: 30 March 2022

Signature:

A handwritten signature in black ink, appearing to read 'S. Murdoch', written in a cursive style.

Name: Stephen Murdoch

CEO