

VMware is committed to acting ethically and responsibly and to use its position as a market-maker in virtualization and cloud computing technology to improve conditions within its communities. Not only do we firmly support and comply with the anti-slavery and human trafficking laws in the countries in which we do business, but we work actively within our business circles to prohibit slavery and human trafficking.

Our [Business Conduct Guidelines](#) proclaim VMware's support and respect to internationally recognized human rights including human trafficking concerns and fair employment practices. All VMware people are expected to uphold the human rights of anyone with whom we do business or interact. The VMware Business Conduct Guidelines also encourage the reporting of any suspected violations and provides the proper contact channels.

While VMware does not "manufacture" in the traditional sense with the use of factories or labor houses, VMware evaluates its supply chain to identify any partners and suppliers that pose risks for illegal or unethical behaviour such as engaging in human trafficking, slavery or other human rights violations. In order to support compliance throughout its ecosystem, VMware has established the following initiatives:

VMware's Partner Integrity Initiative: VMware requires that its Partners take compliance training and submit themselves to due diligence and background checks. In addition, VMware requires its Partners to agree to the principles embodied within its [Partner Code of Conduct](#) ("Partner Code"). The VMware Partner Code expressly restricts unethical labor practices including the use of forced or involuntary labor of any kind.

VMware's Supplier Integrity Program: VMware has implemented a Procurement Integrity Initiative to engage suppliers with similar high ethical standards. Key components of VMware's Supplier Integrity Program include the [Supplier Code of Conduct](#) ("Supplier Code"), compliance training, risk assessments and due diligence. We require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. However, we do not conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. We also engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery; however, the verification was conducted internally, not by a third party. We do not have internal procedures for determining whether our suppliers are complying with our standards regarding slavery and human trafficking.

VMware's People Integrity Initiative: VMware personnel are trained at regular intervals on the principles embodied within the company's Business Conduct Guidelines. Importantly, VMware employees are held accountable for their actions and are subject to disciplinary action for failing to adhere to company standards.

VMware's Commitment To Transparency in Supply Chains

For more information about VMware's Commitment Against Human Trafficking and Slavery, please contact the VMware Ethics and Compliance Office (ethicsandcompliance@vmware.com) or VMware's Ethics Helpline at www.etica.ethicspoint.com.