



Anti-Slavery and Human Trafficking Policy

Effective Date: February 15, 2018

Last Revision: August 22, 2020

Owner: Chief Security Officer

Approved By: Ivanti Security Council
and Executive Leadership

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Applicable Country: Global

1.0 Overview and Purpose

Ivanti is committed to high standards of corporate governance, and a key element of this is managing the business in a socially responsible way. Ivanti aims to employ the highest ethical and professional standards as we comply with local laws and regulations applicable to our business. As such, Ivanti is committed to preventing slavery and human trafficking in its corporate activities and its supply chains. This commitment to ethical and professional behavior is enforced and emphasized in our company policies and training programs. Ivanti expects the third-parties, parties such as suppliers and customers, to behave in a similar manner.

This Policy is not intended to impose unnecessary restrictions that are contrary to Ivanti's established culture of openness, trust, and integrity. Ivanti and its senior management are committed to protecting Ivanti's employees, partners, and the company from illegal or damaging actions, that happen either knowingly or unknowingly. They are also committed to protecting Ivanti's information technology resources, brand, intellectual property, personal information, and customer data from misuse or compromise. Ivanti is committed to following all applicable laws and regulations.

This Policy helps ensure the security of Ivanti's Information Systems, including information that Ivanti may gather and store, such that it meets or exceeds industry standards. This Policy also serves to establish, communicate, and document the behaviors and security controls expected of Ivanti employees and information systems.

Ivanti Data includes, but is not limited to, all employee and customer data that is collected, stored, processed or transmitted as well as any other data and/or information Ivanti receives, compiles, or stores.

2.0 Scope

This Policy applies to all employees, contractors, consultants, contingent, and others working at Ivanti and its subsidiaries, including all personnel affiliated with third parties. This Policy applies

to all equipment and systems that are owned, operated, or leased by Ivanti. This Policy is not intended to impede the rights afforded to employees by applicable laws and regulations.

3.0 Policy

Ivanti prohibits slavery or human trafficking. Ivanti employees, vendors, partners, contractors, or anyone with whom Ivanti conducts business are prohibited from in any practices that can be considered human trafficking or slavery. This includes, but is not limited to, the following activities:

- i. Engaging in any form of human trafficking.
- ii. Using forced labor for any type of work.
- iii. Using child labor.
- iv. Procuring commercial sex acts.
- v. Denying an individual access to their identity or immigration documents, such as drivers' licenses, visas, or passports, regardless of issuing authority; denying access includes, but is not limited to, destroying, confiscating, and concealing.
- vi. Using misleading or fraudulent information when recruiting potential candidates, or in the process of an official offer of employment, contract, full-time, or otherwise; this includes, but is not limited to, using a language the potential employee is unfamiliar with, making material misrepresentations regarding key terms and conditions (e.g., wages, location of work, nature of work), or withholding any information regarding key terms and conditions.
- vii. Charging applicants or potential candidates any application or recruitment fee.
- viii. Using recruiters that are not compliant with the labor laws of the country they are recruiting in.
- ix. When required by law or contract, failing to provide or pay for transportation.
- x. When required by law or contract, failing to provide or arrange housing that follows the housing and safety standards of the correlating country.
- xi. When required by law or contract, failing to provide in writing a recruitment agreement, employment contract, or other necessary work documents.

Ivanti is dedicated to monitoring for and removing any human trafficking or slavery in its business and direct hardware supply chain, and reporting any instances discovered to the proper authorities. Direct hardware supply chain suppliers are required to conduct business in a responsible and ethical manner. This includes complying with all applicable laws and prohibiting the use of forced, indentured, bonded, or involuntary prison labor.

It is Ivanti's policy to encourage employees, when they reasonably believe that questionable practices are occurring, to report those concerns immediately (see Clause 5.1 Compliance). All reports are taken seriously and are promptly investigated.

3.1 Supply Chain

Ivanti expects that suppliers will satisfy contractual requirements, understand, and act consistently with Ivanti's approach to integrity, responsible sourcing, and supply chain management.

Due to the nature of Ivanti's business, the company assesses that there is very low risk of slavery and human trafficking within the business and supply chains. Ivanti regularly reviews supply chains to minimize such risks as follows:

- Identify and assess potential risk areas in supply chains.
- Mitigate the risk of slavery and human trafficking occurring in supply chains.
- Monitor potential risk areas in supply chains.
- Protect whistle blowers.

4.0 Related Policies or Standards

This document is part of Ivanti's cohesive set of Information Security policies. Other policies and standards may apply to the topics covered in this document and as such should be reviewed as needed. Policies, standards, and related documentation can be found at <https://insider.ivanti.com/community/security/>.

5.0 Compliance

5.1 Compliance Measurement

Department Managers are responsible to ensure compliance among their personnel, processes, and technology. The IT Department, Department Managers, and/or Information Security Team will verify compliance to this Policy through various methods, including but not limited to periodic walk-throughs, video monitoring, business tool reports, internal and external audits, and feedback to the Policy owner.

If you believe a violation to this policy has taken place, please report this to the Legal Department, Human Resources, or the Security team. You can also make an anonymous report to our whistleblowing hotline; the number by location can be found at www.ivanti.ethicspoint.com.

5.2 Non-Compliance

This Policy will be enforced by the Chief Security Officer and/or Ivanti's Executive Team. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of company property (physical or intellectual) are suspected, the company may report such activities to the applicable authorities.

Ivanti may restrict the use of its computers and network systems when presented with evidence of violation of Ivanti policies, violation of relevant laws, or when it is necessary to do so to protect Ivanti against potential legal liability.

6.0 Revision History

Version	Date of Change	Responsible	Summary of Change
0.1	February 9, 2018	IT Security	Initial Draft
1.0	February 15, 2018	Security Council	Added HR to contacts, and updated language to better reinforce our anti-slavery and human trafficking position
1.1	May 13, 2019	Leah LeDuc	Added standard policy language
1.1	August 5, 2019	Leah LeDuc	Added whistleblower hotline
1.2	July 17, 2020	Jennifer Thomas	Updated Standard Language, incorporated feedback from Legal

7.0 Approval History

Date	Reviewed/Approved by
02/15/2018	Approved by Security Council
5/23/2019	Reviewed and Approved by Security Council
5/30/2019	Reviewed by NL Works Council. No questions or remarks.
August 22, 2020	Ivanti Security Council and Executive Leadership