

Anti-Slavery and Human Trafficking Policy and Statement



As a responsible corporate citizen, McAfee, LLC fully supports the elimination of human trafficking and slavery from the supply chain. McAfee intends to comply with the requirements of the California Transparency in Supply Chains Act of 2010 and the United Kingdom's Modern Slavery Act of 2015.

The following statement is a transparent disclosure of actions we have taken in support of our effort to ensure that human trafficking and slavery are not taking place in our supply chain or in any part of our business.

We do not tolerate trafficking of persons, the procurement of commercial sex acts, nor the use of forced labor and all related conduct.

Evaluation of Risk

We believe that the nature of our business and the regulatory environment in which we operate mitigate the risk of human trafficking and slavery taking place within our business and our supply chain. McAfee employs a technically skilled, professional labor force and does not frequently use labor brokers or other third parties to obtain labor. A substantial portion of McAfee sales include customizable software and services, and our supply chain does not involve the purchase of a large volume of physical goods.

Despite our low risk, we conduct human trafficking and slavery due diligence on our suppliers. We require prospective suppliers to complete a due diligence process during which we:

- (1) collect information from the supplier;
- (2) review the supplier's reputation and background; and
- (3) complete a risk-based assessment of both the location of the supplier and the proposed scope of work.

Subcontractors or suppliers that pose potentially higher risks of human trafficking and/or slavery are subject to more detailed risk assessments and additional oversight, if necessary, to help ensure compliance with our internal controls and applicable law.

In light of our minimal risk, we do not use a third party to verify that our supply chain is free from human trafficking and slavery.

Auditing

In light of our minimal risk, we do not audit our suppliers to evaluate their compliance with this Policy.

Required Certification of Compliance with Law

In general, our suppliers are contractually required to comply with applicable laws and regulations in the U.S. and globally in providing us manufactured goods, products and services. Suppliers agree to implement due diligence procedures for their own suppliers, subcontractors, and other participants, and they acknowledge that neither the Supplier nor any of its officers, employees, or other associates have been convicted of any offence involving slavery and human trafficking and have never been the subject of any investigation by a regulatory body regarding any offence in connection with slavery and human trafficking.

Maintenance of Ethics and Compliance Program and Accountability

We maintain a broad-based corporate ethics and compliance program that addresses values, leadership, training, audits, certifications and accountability and is intended to ensure compliance with applicable laws and a culture committed to ethics and integrity in all we do. In keeping with this commitment, we maintain robust, global supply chain programs, practices and procedures to support the goal of ensuring that our suppliers meet our strong ethical standards and comply with applicable laws and regulations, including those prohibiting human trafficking and forced labor.

In addition, our employees are responsible for complying with our internal controls that seek to combat human trafficking and forced labor.

McAfee, LLC employees found to be in violation of this procedure are subject to discipline, up to and including termination.

Training of Relevant Employees

McAfee, LLC provides training and awareness on human trafficking and forced labor to employees and promotes targeted awareness through various methods, including online training modules, corporate communication campaigns, ethics articles, posters at applicable work sites and postings on internal McAfee, LLC websites. Employees that have direct contact with our suppliers are required to complete awareness training.

Reporting Violations and/or Concerns

We expect and encourage our employees to raise any concerns regarding violations of law, regulations or our standards of business conduct by using one of several reporting channels we offer, including our corporate Ethics Hotline which permits anonymous reporting. We have established human trafficking as a specific category for reports. Reports can be made without fear of retaliation which we do not tolerate.