VMware's Commitment to Prohibit Slavery and Human Trafficking

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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 slavery and human trafficking laws in the countries in which we do business, but we work actively within our business circles to prohibit the use of slavery and human trafficking.

VMware's Partner Integrity Initiative: The VMware Partner network is numerous and vast, so it provides an optimal opportunity to communicate ethical business standards. As such, in addition to requiring its Partners take compliance training and submitting to due diligence and background checks, 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 Procurement Integrity Initiative: The VMware Supplier network is as equally vast and varied as its Partner community. For this reason, VMware has implemented a Procurement Transparency Initiative to engage suppliers with similar high ethical standards. Key components of VMware's Procurement Integrity Initiative include:

- Supplier Code of Conduct ("Supplier Code"). VMware's Supplier Code addresses issues such as human rights, environmental protection, workplace safety and ethical labor principles. Specifically, these principles reinforce and strengthen our commitment to the rights of our employees, workers in our supply chain, and workers in the global community.
- Certifications: VMware requires that its direct suppliers certify compliance with all local laws, including but not limited to those regarding the eradication of slavery and human trafficking, and suppliers must affirmatively commit to not use forced or involuntary labor.
- Risk Assessments: While VMware does not "manufacture" in the traditional sense with the use of factories or labor houses, VMware evaluates its supply chain for its products to identify which suppliers pose the greatest risk for engaging in human trafficking and slavery as well as those who source from conflict mineral locations.
- Verifications: For higher risk suppliers, VMware engages a third party to perform due diligence to verify compliance with the principles in the Supplier Code.
- Audits: VMware is embarking on a process to verify compliance with its Supplier Code through periodic audits. These audits will be conducted by VMware's internal teams and are typically done on an announced basis, although VMware reserves the right to conduct unannounced audits as well.

VMware's People Integrity Initiative: VMware procurement personnel are trained at regular intervals on the principles embodied within the company's Business Conduct Guidelines, Partner Code and Supplier Code. Additionally, VMware procurement personnel receive training with regard to prohibiting slavery and human trafficking and the associated legal requirements. Importantly, VMware employees are held accountable for their actions and are subject to disciplinary action for failing to adhere to company standards.

For more information about VMware's Commitment to Prohibit 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.