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Introduction

This report constitutes VMware Norway AS ("VMware") report in accordance with the requirements of Norwegian Transparency Act pertaining to responsible sourcing, fundamental human rights and decent working conditions, anti-slavery, human trafficking, anti-bribery and corruption.

About us

VMware Norway is a wholly owned subsidiary of VMware Unlimited International Company, located in Ireland (VMware) and is a part of the VMware group of companies sitting under our ultimate parent entity, VMware Inc., an American publicly traded company listed on the New York Stock Exchange (NYSE).

Since the inception of our Norwegian operations in 2020, VMware Norway's 30 employees and ecosystem of partners has become a leader in technology innovations transforming many industries—from banking, healthcare, and government to retail, telecommunications, manufacturing, and transportation. Our software and services spans compute, cloud, networking and security, and digital workspace.

Where we operate

VMware is a multinational Global operating company.

Where we source

Goods and services procured by VMware come from suppliers and contractors located around the world.

VMware's procurement categories include:

- (1) property and operations;
- (2) human resources;
- (3) professional services;
- (4) information technology and;
- (5) global mobility and travel.

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 behavior such as engaging in human trafficking, slavery, or other corruption violations.

At VMware, we are committed to acting ethically and responsibly to use our position as a market-maker in virtualization and cloud computing technology to improve social conditions within our communities. VMware firmly supports and complies with the applicable laws in the countries in which we do business, and works actively within our business circles to prohibit unethical behavior and practices in our supply chain.

At VMware, we are committed to upholding fundamental human rights and decent working conditions for all our employees and partners. We recognize that our success depends on maintaining a culture of

integrity, transparency, and accountability, and we are committed to complying with all relevant global laws and regulations governing human rights, labour practices, and anti-corruption.

VMware has in place a comprehensive Human Rights Policy, which outlines our commitment to respecting human rights and our expectations of our suppliers and partners. We also have policies and procedures in place to prevent slavery and human trafficking in our supply chain. This program includes due diligence procedures for third-party intermediaries, regular reviews of our anti-slavery policies and procedures, and training programs for our employees.

VMware requires all suppliers to acknowledge our supplier code of conduct. Additionally, VMware reviews all suppliers via a comprehensive risk assessment program. As part of this review VMware sourcing will review all high risk suppliers and apply appropriate risk mitigation strategies including inactivating the supplier and making an alternative supplier recommendation, partnering with VMware Ethics and Compliance team to implement supplier reviews, additional contract provisions and other protocols to address the specific areas of risk.

VMware also engages in providing equitable pay standards and decent working conditions for its employees. With integrity at the heart of our values, we build and protect trusted relationships with our customers, partners, shareholders and our people. Our corporate governance practices provide a framework for operating VMware in our stakeholders' best interests and the requirements of law. We manage our affairs according to the highest principles of business ethics.

VMware maintains every effort to periodically review all legislation changes and modify our supplier diligence questionnaires on a periodic basis to ensure we are effectively collecting information to ensure compliance across all requirements.

Governance Programs, Policies and Codes

In order to support compliance and address compliance risks throughout its business, VMware has in place following initiatives within its ecosystem

INITIATIVE/PROGRAM	Actions
Supplier Code of Conduct ("Supplier Code")	The Supplier Code sets out VMware's expectations for its suppliers, vendors, contractors, consultants and all other providers of goods and services to VMware ("Suppliers") to conduct business responsibly, with integrity, honesty and transparency and to comply fully with key principles, and ensuring that Suppliers observe and comply with local and international principles and laws.
Partner Integrity Initiative	VMware requires that its partners take compliance training and submit themselves to due diligence and background checks. In addition, its Partners must agree to the principles embodied within its Partner Code of Conduct ("Partner Code"). The Partner Code expressly restricts unethical labor practices including the use of forced or involuntary labor of any kind.
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 , compliance training, risk assessments and due diligence.
People Integrity Initiative	VMware's personnel are trained at regular intervals on the principals embodied within its Business Conduct Guidelines and other relevant internal policies. All VMware employees are held accountable for their actions and are subject to disciplinary action for failing to adhere to company standards. VMware also maintains company-wide accountability and grievance mechanisms (such as VMware's Ethics Helpline), which are available to both employees and external Suppliers to raise any concerns regarding unethical or illegal conduct.

VMware's Due Diligence

VMware conducts Due Diligence on a global level, but the Due Diligence is tailored to each individual VMware business based on their specific nature and/or size, severity and likelihood of negative impact on fundamental human rights and decent working conditions.

The below due diligence areas demonstrate how VMware continues to monitor, assess, and address risks in its sourcing and supply chains.

Supplier Onboarding: As part of our supplier onboarding process, Suppliers are asked to:

- (1) Complete a questionnaire and provide required documentation via VMware's Supplier Information Management Portal;
- (2) acknowledge and agree to VMware's Supplier Code of Conduct and
- (3) acknowledge and agree to the requirements on the use and disclosure of any personal information in delivery of services and;
- (4) disclose any known conflict of interest.

VMware's Supplier Integrity Program additionally requires suppliers to complete a due diligence questionnaire and certify key information regarding their enterprise/business, its compliance practices, and policies. Suppliers are required to provide an updated due diligence questionnaire periodically.

Supplier Contracting: VMware includes specific language in its third party contracts to ensure suppliers comply with all applicable laws, rules, regulations, orders, conventions, ordinances or standards including those relating to, wages, hours and conditions of employment, Subcontractor selection, discrimination, and occupational health/safety.

Contractual terms with suppliers also require, amongst other things, that the suppliers and their subcontractors, vendors, agents or other associated third parties do not utilize child, slave, prisoner or any other form of forced, bonded or involuntary labor, or engage in abusive employment or corrupt business practices, in the supply of goods or provision of services.

Measuring the Effectiveness of VMware's Compliance Programs

We recognize that our commitment to human rights, labor practices, and anti-corruption is an ongoing process, and we are committed to continually reviewing and improving our policies and procedures to ensure that we uphold the highest ethical standards. We will continue to work with our stakeholders, including employees, partners, customers, and regulators, to promote transparency, accountability, and responsible business practices.

To continue to assess compliance risks and to help with VMware coming up with mechanisms to measure effectiveness, VMware has embedded controls into to the Supplier Integrity Program to ensure suppliers in at risk categories have, at a minimum:

- provided VMware all relevant questionnaires /commitments/ documented processes; and
- acknowledged and agreed to comply with the VMware Supplier Code of Conduct or provided evidence of equivalent company code of conduct.

VMware additionally performs adverse media searches for vendors in at-risk categories to identify possible red flags in relation to labor laws and infringements. Where a potential risk is identified, VMware's global procurement and sourcing teams will engage the suppliers to provide a corrective action plan that outlines the cause of the issue as well as the remediation steps to address the identified risk.

VMware's Report on its compliance with the Transparency Act



VMware will then assess whether the plan is satisfactory based on the severity of the issue and continue to monitor and ensure that the supplier completes and maintains the corrective actions and behaviors. VMware management believe that the policies and procedures in place appropriately address compliance risks for VMware.

VMware hereby confirms that this statement was approved by the directors of VMware on:

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

Kieran Barry-Murphy, Director, VMware Norway AS

Date: 29 June 2023

DocuSigned by:

Andrew Stevens, Director, VMware Norway AS

Date: 6/29/2023

Craig Norris, Director, VMware Norway AS

Date: Jun 29, 2023