

Micro Focus - Anti-Slavery Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act and covers the Micro Focus financial year starting on 1 November 2018 and ending on 31 October 2019. This statement has been approved by Micro Focus International plc's Board of Directors on 25 March 2020 and is published on behalf of Micro Focus International plc and its qualifying group companies. References to "Micro Focus", "we", "us", "our" or the "company" are to each of these entities.

1. Introduction

Micro Focus (LSE: MCRO.L, NYSE: MFGP) helps organizations run and transform their business. Driven by customer-centric innovation, our software provides the critical tools they need to build, operate, secure, and analyse the enterprise. By design, these tools bridge the gap between existing and emerging technologies—enabling faster innovation, with less risk, in the race to digital transformation. Our solutions span four key areas:

- Enterprise DevOps—Build and deliver better software faster
- Hybrid IT Management—Operate with agility
- Security, Risk & Governance—Secure what matters most
- Predictive Analytics—Analyse in time to act

Micro Focus is headquartered in Newbury (United Kingdom) and the Group has a presence in 48 countries worldwide and employs over 12,000 people. For more information visit www.microfocus.com.

2. Our Business and Supply Chain

As an office-based software company with a professional workforce, Micro Focus does not consider its own employees to be at high-risk from a slavery, forced labour or human trafficking point of view.

Micro Focus also does not have an extensive range of local or international suppliers and does not operate any manufacturing facilities. Our supply chain broadly consists of contract and outsourced workers (mostly professional consultants), telephone-based support services, and other goods and services provided in relation to our offices, such as stationery suppliers, caterers, office cleaners and suppliers of marketing merchandise.

We are nonetheless committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery, forced labour and human trafficking does not take place anywhere in our business or supply chains.

3. Risk Review

We continue to develop our risk-based approach to avoid modern slavery occurring in our supply chains. This includes informing our suppliers of Micro Focus' obligations under the Modern Slavery Act 2015 and the ethical standards expected of them by providing them with a copy of the relevant policies.

We review our procurement practices, systems and controls to further identify, assess and monitor potential risk areas in our supply chains, and identify ways to further mitigate the risk of slavery and human trafficking occurring in our supply chains. We include requests for information on modern slavery and supply chains in our Requests for Proposals. We also incorporate appropriate clauses on modern slavery in supplier contracts where applicable. Micro Focus' standard form purchase order terms (last updated in June 2019) include express obligations upon suppliers to comply with all applicable anti-modern slavery laws as well as Micro Focus' Modern Slavery Statement. Further, suppliers are required to take all reasonable steps to ensure that slavery, servitude, human trafficking, forced labour and/or child labour do not take place in its supply chains and/or in any part of its business, and suppliers are required to notify Micro Focus immediately if they become aware of any such circumstances.

4. Policies

Micro Focus' worldwide Code of Conduct is reviewed annually and was last updated in July 2019. The Code of Conduct outlines our commitment to observing the highest ethical standards that guide our business practices across a number of areas, including in relation to human rights.

The Code of Conduct has been communicated to all our staff (including through dedicated training), and includes our Anti-Slavery and Human Trafficking Policy.

Our Anti-Slavery and Human Trafficking Policy outlines our zero-tolerance approach to slavery and human trafficking and encourages employees to report any concerns immediately.

In addition, we have both an Anti-Bribery and Corruption Policy and a Whistleblowing Policy. Together, these policies aim to ensure that our business is conducted in an ethical and responsible manner and that employees are able to voice any concerns they may have securely and confidentially.

5. Due Diligence & Procedures

We have also published our Supplier Code of Conduct, which includes details of our standards on issues such as slavery, human trafficking, forced labour and child labour, for implementation across the total Micro Focus group. The Supplier Code of Conduct is available in the Micro Focus Supplier Portal.

We carry out assessments to ensure that suppliers are not on restricted parties lists.

6. Corporate Social Responsibility

Social responsibility and the respect for human rights is a core value at Micro Focus and shapes our behaviours, decision-making and culture. Our global Corporate Social Responsibility (CSR) programme covers every aspect of the organisation, from how we play our part in shifting to a lower carbon economy and reducing the effects of climate change, to how we manage relationships with employees, suppliers, customers and communities. The Micro Focus CSR Committee is responsible for ensuring that the company has a fit for purpose CSR programme and supporting policies.

For more information on our CSR initiatives, please see [here](#).

7. Training

Information on modern slavery is included in our company-wide Code of Conduct and related training. This training takes place annually and is obligatory for all employees, including our sales, marketing, legal, procurement and finance teams.

In 2019, we conducted web-based Code of Conduct training to over 12,000 regular employees and face-to-face workshop training to over 1,100 employees in higher-risk countries.

8. Responsibility and Monitoring

The Board of Micro Focus International plc has overall responsibility for ensuring that the Micro Focus worldwide Code of Conduct and this statement comply with our legal and ethical obligations and that all those under Micro Focus' control comply with it.

Our Group Compliance Officer, supported by the Corporate Compliance and Ethics team, has primary and day-to-day responsibility for monitoring the Code of Conduct and this statement's use and effectiveness.

9. Reporting

If issues are identified in relation to modern slavery, these should be immediately reported to the relevant manager, the Legal Team or by using a dedicated confidential independent contact point: <https://secure.ethicspoint.eu/domain/media/en/gui/104674/index.html>

Signed:

A handwritten signature in black ink, appearing to read 'S. Murdoch', written in a cursive style.

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Stephen Murdoch
Chief Executive Officer

Micro Focus International plc