



## 1.0 PURPOSE

This policy is intended to ensure F5 employees, contractors, and suppliers are not engaging in human trafficking activities, including but not limited to forced, bonded, or underage labor; trafficking of persons; procurement of commercial sex acts. This policy guides F5 actions to verify compliance, perform corrective action, and report on those activities.

In addition to operating in a way that is consistent with our principles as a company, this policy outlines actions required to meet compliance with certain laws.

The US Federal government has adopted a zero-tolerance policy regarding trafficking in persons, procurement of commercial sex acts and the use of forced labor. Additional information may be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/g/tip>. Please see US Federal Acquisition Regulation FAR Subpart 22.17 and FAR Clause 52.222-50 for further details.

Under the UK Modern Slavery Act, companies must communicate their efforts to eradicate human trafficking from their supply chains, as well as report results and findings. This policy outlines the human trafficking stance and efforts at F5, Inc. and UK Modern Slavery updates will be published in accordance with the policy.

## 2.0 SCOPE

This policy applies to all F5 employees and temporary workers working at F5 facilities or project sites. In addition, this policy includes requirements of suppliers and subcontractors to F5.

## 3.0 POLICY STATEMENT

It is the policy of F5 to not engage in any form of human trafficking. Activities prohibited under this policy include, but are not limited to:

- Engaging in trafficking of persons.
- Employing underage, bonded, or slave labor.
- Procuring commercial sex acts, even in jurisdictions where such activity is legal.
- Destroying, confiscating, or otherwise concealing or denying access to an individual's identity or immigration documents.
- Practicing misleading, fraudulent, or illegal recruitment techniques or charging recruitment fees.
- Using recruiters that fail to comply with labor laws of the country of employment.
- Failing to disclose terms and conditions of employment.
- Failing to provide an employment contract or work document in a language understood by all parties.



- Failing to provide return transportation upon the end of employment agreement, where required.
- Failing to provide housing that meets standards of the country of employment, where required by law or contract.

F5 will inform the appropriate internal and external partners of any information it receives from any source (including host country law enforcement) that alleges an F5 employee, subcontractor or subcontractor employee has engaged in conduct that violates this policy and any actions taken against F5 employees, subcontractors or subcontractor employees pursuant to this policy.

Regular risk assessments will take place in accordance with a compliance plan established by F5 in order to fulfill the duties laid out in this policy.

### **Contacts and Reporting**

If you are aware of any violations of this Policy, it is your duty and responsibility to report that violation to management or through the F5 Ethics Hotline, which is available online at [f5.ethicspoint.com](https://f5.ethicspoint.com) or by telephone at 1(855)409-0947 (for a list of phone numbers outside the U.S., go to [f5.ethicspoint.com](https://f5.ethicspoint.com)).

F5's Whistle Blower Policy protects you from retaliation for any good faith report.

If you have any questions or comments regarding this Policy, please contact the General Counsel's office.

## **4.0 DEFINITIONS**

**Human trafficking or Trafficking of Persons:** An umbrella term covering the recruitment, harboring, transporting, providing, or obtaining of a person for compelled labor or commercial sex acts, particularly through the use of force, fraud or coercion.

**Child Labor of Underage Labor:** Labor of a person under the age of 15, under the age for completing compulsory education, or the statutory age of labor within the country of work; whichever is higher.

**Commercial Sex Acts:** Any act in which sex or in person sex acts are exchanged for money.

**Employment Contract:** A clearly written, signed statement of employment outlining an employer's and employee's rights and responsibility.

**Slave Labor:** Coerced labor or services from a captive individual.

**Bonded Labor:** labor performed where the use of debt or bond is used to establish control over an individual. Debt may be to a variety of parties including recruiters or parties facilitating the movement of migrant labor.

## **5.0 RESPONSIBILITIES**

*F5 Employees*

F5 employees must comply with the prohibitions listed under the policy section of this document. Additionally employees who witness or have credible evidence of any of the prohibited activities taking place are required to report such activity to the General Counsel's office. You can also file a report via the F5 Ethics Hotline, which is available online at [f5.ethicspoint.com](https://f5.ethicspoint.com) or by telephone at 1(855)409-0947 (for a list of phone numbers outside the U.S., go to [f5.ethicspoint.com](https://f5.ethicspoint.com)).

*Contractors and Business Partners*

F5 contractors and business partners must comply with the prohibitions listed under the policy section of this document. Additionally any contractor or contractor employee who witness or has credible evidence of any of the prohibited activities taking place are required to report such activity to the General Counsel's office. You can also file a report via the the F5 Ethics Hotline, which is available online at [f5.ethicspoint.com](https://f5.ethicspoint.com) or by telephone at 1(855)409-0947 (for a list of phone numbers outside the U.S., go to [f5.ethicspoint.com](https://f5.ethicspoint.com)).

*F5 Suppliers*

F5 suppliers must adopt a policy that, at a minimum, lists the prohibitions listed under the policy section of this document. In addition, suppliers must maintain adequate systems in recruiting, employment, health and safety, whistleblower protection and issue reporting, and other relevant areas to ensure compliance with that policy, including a mechanism to support reporting of violations to F5.

F5 procures components from suppliers through a variety of channels. We ask all suppliers to self-report policy compliance annually. Suppliers with which F5 has a direct purchasing agreement, may be audited by F5 or a contractor on behalf of F5 to ensure compliance with this policy.

*Human Resources Department*

Human Resources (HR) at F5 is responsible for investigation of violations and enforcement of penalties where violations involve F5 employees or on-site contractors and may be assisted in those duties by the Business Integrity team.

HR will perform periodic audits of F5 recruitment, document management, and employment systems to ensure F5 employment practices comply with all prohibitions listed in the policy section of this document.

HR will ensure this policy is communicated to all employees.

*Information Technology Department*

Information Technology (IT) at F5 will work to minimize access to websites and online services which facilitate or result in breaches of this policy. IT will block access to sites known to facilitate trafficking in persons or procurement of sex acts and may monitor employee email, internet, and company asset use to ensure compliance with this policy.



#### *Purchasing and Manufacturing Supply Chain departments*

The Purchasing and Manufacturing Supply Chain department are responsible for ensuring suppliers of services, business goods, and components built into F5 hardware comply with this policy. Purchasing and Manufacturing will undertake due diligence to ensure suppliers have adequate policies, procedures and business systems in place to ensure compliance with the prohibitions listed in this policy. All new indirect-spend vendors will be given the policy at the time of vendor enrollment.

#### *Business Integrity Department*

The Business Integrity department will serve as the primary contact point for reporting violations of this policy, and as deemed appropriate, will communicate violations, corrective actions, enforcements, and any other necessary information regarding this policy to the relevant local or national authorities.

#### *Corporate Social Responsibility group*

The Corporate Social Responsibility group will publish periodic updates on actions taken to ensure compliance with this policy, and will ensure those disclosures meet the requirements set forth by relevant local and national statutes such as the UK Modern Slavery Act. Manufacturing/direct spend suppliers will be contacted and asked to sign off on the policy through the Assent Compliance portal used by the manufacturing compliance teams annually.

## **6.0 ENFORCEMENT**

### *F5 Employees*

F5 employees, contractors, subcontractors, suppliers, and partners must not engage in human trafficking in any form and if an F5 employee is suspected or found to be in violation of this policy, this will be subject to disciplinary action, including termination.

### *Temporary Workers*

Temporary workers under contract with F5 must also comply with this policy and the F5 code of conduct.

### *Suppliers*

Suppliers who fail to comply with this policy will be required to provide a corrective action plan to F5. F5 will then follow up to ensure the corrective action plan has been implemented and is resulting in compliance with this policy.

Refusal to apply corrective actions or failure of those actions to achieve compliance with this policy will result in termination of business contracts and removal from F5 purchasing lists.

## **7.0 EXCEPTIONS**

Exceptions to this policy are not permitted.

## **8.0 DOCUMENT MANAGEMENT**



This policy will be reviewed every 2 years. In addition, a Human Trafficking Statement, in line with the requirements laid out in the UK Modern Slavery Act will be published annually, in March or April.

**Revision History and Approval**

*Use full date format to ensure international parity*

Rev #	Revision Date	Description	Policy Owner	EVP Approver	Approval/ Review Date
1.0	October 20, 2017	Initial draft version	Wyeth Larson	Steve McMillan	N/A
1.1	March 8, 2019	Final version of new policy	Wyeth Larson	Steve McMillan	March 8, 2019
1.1	March 8, 2019	Reviewed – no changes	Wyeth Larson	Tom Fountain	June 22, 2021
1.1	June 6, 2023	Renewed with updates in progress	Katherine Clouse	Tom Fountain	None needed

**9.0 RELATED POLICIES & PROCESSES**

[Enterprise Code of Conduct](#)

[Human Trafficking Statement](#)