# MODERN SLAVERY STATEMENT 2019



Juniper Networks, Inc. and its subsidiaries (Juniper Networks) have developed this statement to comply with the California Transparency in Supply Chain Act of 2012 (SB657), the United Kingdom Modern Slavery Act of 2015 (Modern Slavery Act), and the Federal Acquisition Regulation (FAR)/Defense Federal Acquisition Regulation Supplement (DFARS) under FAR 52.222-50 and DFARS 252.222-7007. This statement outlines our commitment and approach to promoting a workplace and supply chain free from modern slavery and human trafficking, and one where workers are treated with respect and dignity.

### **Background**

Juniper Networks designs, develops, and sells products and services for high-performance networks, to enable customers to build scalable, reliable, secure and cost-effective networks for their businesses, while achieving agility, efficiency and value through automation.

Juniper Networks sourcing and manufacturing activities are outsourced to a worldwide network; the key elements of which are comprised of: contract manufacturers (CM), original design manufacturers (ODM), component suppliers, warehousing and logistic firms, and recruiting firms. Our outsourced model provides a tremendous opportunity and responsibility to encourage the adoption of responsible business practices.

Juniper Networks is committed to a collaborative approach in applying leading standards and practices in the electronics industry supply chain in order to drive performance and compliance with critical corporate social responsibility policies. To this end, Juniper Networks is a member of the Responsible Business Alliance (RBA) and participates in a RBA taskforce focused on the eradication of trafficked and forced labor in the electronics industry supply chain.

## **Policies**

Juniper Networks is dedicated to honoring human rights, including the eradication of human trafficking, modern slavery and forced and child labor. Juniper Networks believes that ethical business practices and compliance with laws are essential, and we expect our employees and our global supply chain network to adhere to the same high ethical standards.

Juniper Networks' policies are informed by the <u>RBA Code of Conduct</u> and the <u>Ten Principles of the United Nations Global Compact</u>. Our policies, codified in our Worldwide Code of Business Conduct and our Business Partner Code of Conduct, articulate a shared vision and set of expectations for Juniper Networks employees and business partners.

- Worldwide Code of Business Conduct: Our Worldwide Code of Business Conduct applies to all employees who represent Juniper, regardless of location, and is an extension of Juniper's core values and principles the Juniper Way. It establishes acceptable interactions in the workplace, including expectations on human rights.
- Business Partner Code of Conduct: Our Business Partner Code
  of Conduct applies to all business partners, including direct
  and indirect suppliers, vendors and contractors. It is aligned
  with the RBA Code of Conduct, and communicates to our
  suppliers Juniper Networks' expectations on implementation of
  a management system approach for upholding human rights,
  including eradication of forced, bonded or indentured labor,
  involuntary prison labor, slavery and trafficking of persons.

### **Actions**

Juniper Networks has implemented policies and procedures to prevent prohibited activities and to monitor, detect, and take appropriate corrective action if any prohibited activities are identified, up to and including termination. Juniper Networks follows an internationally recognized compliance program framework for human trafficking and modern slavery: verification, audit, certification, accountability, and training.

- Verification: Annually, we evaluate and identify risks of human trafficking and slavery through monitoring of our corporate operations' and direct material suppliers' and manufacturing partners' compliance to the RBA Code of Conduct. Suppliers who meet the following criteria are included in the risk assessment process:
  - Suppliers who are in the top 80% of direct material spend in the relevant calendar year (based in part on forecasted spend),
  - All CMs and ODMs, and
  - All direct material suppliers who provide what are identified as the most critical technologies and can have a broad impact across Juniper.

Juniper Networks utilizes the <u>RBA assessment process and tools</u>, or equivalent, to help us measure and better understand the level of compliance to the RBA code and which gaps remain for further review and action. In 2018, Juniper assessed compliance and labor risks at 79 supplier facilities, an 88% increase in the number of assessed supplier facilities compared to 2017. Of the 79 facilities, 1% was identified as high risk, which was subsequently recategorized in 2018 to low risk based on improvements in the robustness of policies, controls, and performance.

- Audit: Using the outputs from the RBA assessment process and tools, as described above, we apply a risk-based approach to determining at which supplier facilities to conduct onsite audits. Juniper Networks employs an independent third-party to conduct announced audits of those supplier facilities that present a potential high risk of non-compliance to the corporate social responsibility standards set forth in the RBA Code of Conduct, including risks to human rights. The independent, thirdparty auditors are specially trained in social and environmental auditing and utilize a standardized RBA Validated Audit Process (VAP) protocol. When available, Juniper Networks also reviews supplier audit reports through RBA's audit sharing system. Findings identified during the audit process are communicated to the suppliers for corrective action, tracked to closure, and reviewed during supplier business reviews, where applicable. Priority focus is placed on the following issues if identified: child labor, forced labor, bonded labor, and inhumane treatment.
- Certification: Our Employees, as well as authorized representatives of our business partners, where required, certify that they have read, understood and are committed to complying with the principles of the Worldwide Code of Business Conduct and the Business Partner Code of Conduct, respectively. Juniper Networks terms and conditions require suppliers to comply with legal requirements in all their activities. As Juniper Networks refreshes supplier master purchase and service agreements, the Business Partner Code of Conduct is integrated into contracts and, thus, further emphasizing expectations of ethical behavior.
- Accountability: The Audit Committee of our Board of Directors is responsible for the overall oversight of our Integrity and Compliance Program. Our Chief Compliance Officer has overall responsibility for the direction and execution of the corporate ethics and compliance program, including the effective internal and external communications of corporate values, ethics, business conduct standards, policies and compliance programs through vehicles such as the Worldwide Code of Business Conduct and Business Partner Code of Conduct. Managers are responsible for their team's compliance with the law, the codes of conduct, and company policies.
- Training: All of our employees are provided with the Worldwide Code of Business Conduct upon hire and undergo initial and continual training on the contents of the Code. Employees with direct responsibility for the human trafficking compliance program complete tailored trainings, including specifics on the

governing legal requirements and human rights risks in the supply chain. Additionally, employees engaged with the U.S. Federal Government complete a course focused on the specific requirements associated with government contracts, including those under FAR 52.222-50 on human trafficking and forced labor. Additionally, through our RBA membership, we support the development of workshops, trainings and reports focused on ensuring understanding of the RBA policies, best practices, and the true extent and trends of trafficked and forced labor in the electronics industry. These resources are made available to our suppliers.

# Violation Monitoring, Reporting and Remediation

All Juniper Networks employees and suppliers, partners, contractors, subcontractors and agents are encouraged to report any activity or condition that may violate the Worldwide Code of Business Conduct or Business Partner Code of Conduct or the requirements of FAR 52.222-50, SB657 or the Modern Slavery Act, confidentially and without retaliation using one of the following methods:

- Email integrity@juniper.net
- Call the toll free Juniper Integrity Hotline at +1-855-410-5445 or submit a report online at integrity.juniper.net
- Contact Juniper's Chief Compliance Officer

Based upon the steps taken and to the best of Juniper Networks' knowledge and belief, neither Juniper Networks nor any of its agents, subcontractors, or their agents has engaged in any trafficking, forced or child labor, as defined in the FAR 52.222-50, SB657 or the Modern Slavery Act. In the event that abuses relating to any of the prohibited activities identified in the FAR 52.222-50, SB657 or the Modern Slavery Act are found, Juniper Networks will implement the appropriate remedial actions within local country laws, up to and including termination of employees, agents and contractors and termination of contracts.

We are committed to providing transparency in all aspects of our business. For further information on the activities undertaken in 2018 to promote responsible practices in our operations and our supply chain, refer to Juniper's Corporate Citizenship and Sustainability Report.

The Board of Directors of Juniper Networks, Inc. has approved this statement.

Rami Rahim. Chief Executive Officer

Fax: +31 0 207 125 701