

# Anti-Slavery and Human Trafficking Statement

## 1. Introduction

McAfee Corp. fully supports the elimination of human trafficking and slavery from all businesses and supply chains. This statement establishes:

- Our commitment to conducting business with integrity and standing against human trafficking, forced, debt-bonded, indentured, and slave labor;
- The actions we have taken to understand potential modern slavery risks related to our business and to ensure these events do not occur in any part of our business; and
- Our compliance with the California Transparency in Supply Chains Act of 2010 and the United Kingdom's Modern Slavery Act of 2015.

## 2. Statement

### 2.1 Our Organization

McAfee Corp. (the "McAfee," "we," "us" or "our") is a pioneer and leader in protecting consumers, enterprises, and governments from cyberattacks for more than 30 years with integrated security, privacy, and trust solutions. We are singularly committed to one mission: to protect all things that matter through leading-edge cybersecurity. We currently conduct a substantial portion of our operations and sell our products and services in numerous countries outside of the United States, including in the Asia Pacific, Europe, Middle East and Africa, and Latin American regions.

McAfee Corp. was incorporated in Delaware on July 19, 2019. Our principal office is located in San Jose, California. A complete list of McAfee Corp.'s significant subsidiaries worldwide as of the end of its most recently completed fiscal year can be found as Exhibit 21.1 to McAfee Corp.'s Form 10-K, filed with the U.S. Securities and Exchange Commission on March 1, 2021.

### 2.2 Our Business, Supply Chains, and Evaluation of Risk

We believe that the nature of our business and the regulatory environment in which we operate mitigate the risk of human trafficking and slavery taking place within our business and our supply chain. McAfee employs a technically skilled, professional labor force. A substantial portion of McAfee sales include software and services, and our supply chain does not involve the purchase of a large volume of physical goods.

Despite our low risk, we conduct human trafficking and slavery due diligence on our suppliers. We require prospective suppliers to complete a robust due diligence process during which we:

1. Collect information from the supplier;

2. Review the supplier's reputation and background; and
3. Complete a risk-based assessment of both the location of the supplier and the proposed scope of work.

Subcontractors or suppliers that pose potentially higher risks of human trafficking and/or slavery are subject to more detailed risk assessments and additional oversight, if necessary, to help ensure compliance with our internal controls and applicable law.

We have engaged FRDM, a third-party risk intelligence software solution, to provide continuous monitoring on onboarded suppliers. Designed to monitor risks within our supply chain, the FRDM system analyzes our primary suppliers to identify any high risk areas in our supply chain. We review all alerts provided by the system. If a high risk flag is received and the supplier fails to alleviate, to our satisfaction, the risk identified, we will take appropriate action, which may include terminating the supplier.

### **2.3 Assessing the Effectiveness of our Actions and Remediation**

We assess the effectiveness of our actions by:

- Measuring the number of suppliers identified as being high or medium risk relative to that in the prior year; and
- By reviewing and assessing:
  - FRDM media alerts of any suspected incidence of modern slavery and any incidences of modern slavery; and
  - The responses from supplier questionnaires (as needed) in relation to modern slavery and labor hire practices.

### **2.4 Required Certification of Compliance with Law**

In general, our suppliers are contractually required to comply with applicable laws and regulations in the U.S. and globally in providing us goods, products, and services. Suppliers agree to implement due diligence procedures for their own suppliers, subcontractors, and other participants, and they acknowledge that neither the Supplier nor any of its officers, employees, or other associates have been convicted of any offence involving slavery and human trafficking and have never been the subject of any investigation by a regulatory body regarding any offence in connection with slavery and human trafficking.

### **2.5 Maintenance of Ethics and Compliance Program and Accountability**

We maintain a broad-based corporate ethics and compliance program that addresses values, leadership, training, audits, certifications, and accountability and is intended to ensure compliance with applicable laws and a culture committed to ethics and integrity. In keeping with this commitment, we maintain robust, global supply chain programs, practices and procedures to support the goal of ensuring that our suppliers meet our strong ethical standards and comply

with applicable laws and regulations, including those prohibiting human trafficking and forced labor.

In addition, our employees are responsible for complying with our internal controls that seek to combat human trafficking and forced labor. McAfee employees found to be in violation of this procedure are subject to discipline, up to and including termination.

## 2.6 Policies

Our core business philosophy is to conduct business with uncompromising integrity and professionalism. We maintain the following policies and guidelines that support the identification and prevention of slavery and human trafficking in our operations:

- **Code of Conduct:** The [Code of Conduct](#) serves as a compass for our employees, directors, and business partners to consistently act with uncompromising integrity as we build trusted relationships around the world. We will not tolerate and we work to prevent any practices involving human trafficking, forced, debt-bonded, indentured, and slave labor in our operations and supply chain.
- **Whistleblowing Policy:** This policy establishes procedures for the receipt and treatment of complaints received by McAfee regarding behavior in violation of the law, our Code of Conduct or any company policy.
- **Anti-Human Trafficking Policy:** This policy supports our commitment to human rights and discloses the actions we have taken to ensure human trafficking and slavery are not taking place in our supply chain or in any part of our business.
- **Supplier Ethics Expectations:** We expect all suppliers to [comply with our Code of Conduct and ethical expectations](#), regardless of local business practices or social customs.

## 2.7 Training of Relevant Employees

McAfee provides training and awareness on human trafficking and forced labor to all employees and promotes targeted awareness through corporate communications campaigns and postings on internal and public McAfee websites.

## 2.8 Reporting Violations and/or Concerns and Non-Retaliation

We expect and encourage our employees and business partners to raise any concerns regarding violations of law, regulations, or our standards of business conduct. The [McAfee Ethics and Compliance Helpline](#) is available 24 hours a day, 7 days a week and allows for anonymous reporting where permitted by law.

We do not tolerate retaliation against anyone for asking questions or making good faith reports of possible violations of law, regulation, the Code of Conduct, or other company guidelines.

**This statement outlines our efforts to address the risks of modern slavery in our operations for the fiscal year ended December 26, 2020 and was prepared in consultation with, and approved by, the Board of Directors of McAfee Corp. on May 11, 2021.**

**Signature:**

**Jared Ross**

**Sr Director and Assistant Corporate Secretary at McAfee Corp.**