FY22 Microsoft Modern Slavery and Human Trafficking Statement

Microsoft

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Board of Directors approval

This Statement describes the actions taken by Microsoft Corporation and its covered subsidiaries (hereinafter collectively referred to as "Microsoft") during Fiscal Year 2022 (FY22) to prevent modern slavery and human trafficking in our operations and our supply chains pursuant to the UK (United Kingdom) Modern Slavery Act and the Australian Modern Slavery Act.

The United Kingdom (UK) subsidiaries that are covered by this Statement include:

- Microsoft Limited Ltd
- Microsoft Research Ltd
- MSFT MCIO Ltd
- GitHub Software UK Ltd
- LinkedIn Technology UK Ltd
- Metaswitch Networks Ltd
- ZeniMax Europe Ltd*

The Australian subsidiaries that are covered by this Statement include:

- Microsoft Pty Ltd
- Microsoft Australia Holdings Pty. Ltd
- Microsoft Datacenter (Australia) Pty Ltd
- LinkedIn Singapore Pte Ltd (Australia Branch office)

Although not a covered entity for purposes of the laws, GitHub Australia Pty Ltd, under the parent company of GitHub, Inc., a wholly owned subsidiary of Microsoft Corporation, is voluntarily reporting its actions to prevent modern slavery and human trafficking in its operations and its supply chains through this Statement.

Senior management of the covered subsidiaries, in consultation with Microsoft, have contributed to and reviewed the content of this Statement. The Microsoft Board of Directors approved this Statement at its November 30, 2022, meeting.

Penny Pritzker Director, Microsoft Board of Directors; Chair, Environmental, Social, and Public Policy Committee.

*ZeniMax Europe Ltd is a covered subsidiary of Microsoft. For reporting purposes, ZeniMax Europe Ltd has published their own Modern Slavery and Human Trafficking Statement.

Introduction

Decent working conditions are a basic human right, essential for an inclusive and sustainable livelihood, and foundational to a life of dignity. As part of Microsoft's responsibility, we continue to take comprehensive steps to ensure that both employees and workers within our global supply chains can exercise their internationally recognized human and labor rights.

This Modern Slavery and Human Trafficking Statement describes how Microsoft meets our commitment to prohibit human trafficking and forced labor in our corporate and subsidiary operations and in our global supply chains.

Microsoft structure, business operations, and supply chains

About Microsoft
Microsoft is a publicly traded (NASDAQ: MSFT) multinational technology company with its corporate headquarters located in Redmond, Washington in the United States of America. As of June 30, 2022, Microsoft employed approximately 221,000 people worldwide. Microsoft business organizations, global operation centers, and worldwide subsidiaries can be found on the [Facts about Microsoft website](#).

Our covered subsidiaries
Our subsidiaries that meet the reporting requirements contained in the UK Modern Slavery Act and the Australian Modern Slavery Act are the following:

United Kingdom (UK) covered subsidiaries
- **Microsoft Limited (Ltd)** is a private limited company (company no. 1624297). It was incorporated in England and Wales and its registered address is Microsoft Campus, Thames Valley Park, Reading, Berkshire, RG6 1WG.
- **Microsoft Research Ltd** is a private limited company (company no. 03369488). It was incorporated in England and Wales and its registered address is 21 Station Road, Cambridge, B1 2FB. It is a subsidiary of Microsoft Ireland Research, which is part of the Microsoft Corporation.
- **MSFT MCIO Ltd** is a private limited company (company no. 09616816). It was incorporated in England and Wales and its registered address is The Broadgate Tower Third Floor, 20 Primrose Street, London, EC2A 2RS. It is a subsidiary of Microsoft Ireland Operations Limited, which is a part of the Microsoft Corporation.
- **Metaswitch Networks Ltd** is a private limited company (company no. 01578918). It was incorporated in England and Wales and its registered address is The Broadgate Tower Third Floor, 20 Primrose Street, London, United Kingdom, EC2A 2RS. The immediate parent company is Somerville Acquisitions Limited which is part of the Microsoft Corporation.
- **LinkedIn Technology UK Ltd** is a private limited company (company no. 06441873). It was incorporated in England and Wales and its registered address The Ray, 123 Farringdon Road, London, England, EC1R 3DA. It is a subsidiary of LinkedIn Ireland Unlimited Company, which is a part of the Microsoft Corporation.
- **GitHub Software UK Ltd** is a private limited company (company no. 06037169). It was incorporated in England and Wales and its registered address is The Broadgate Tower Third Floor, 20 Primrose Street, London, United Kingdom, EC2A 2RS. The immediate parent company is Semmle Incorporated, which is a part of the Microsoft Corporation.

- **ZeniMax Europe Limited** is a private limited company (company no. 06333300). It was incorporated in England and Wales and its registered address is The Broadgate Tower Third Floor, 20 Primrose Street, London, United Kingdom, EC2A 2RS. For FY22 reporting purposes, ZeniMax Europe is publishing a separate Modern Slavery and Human Trafficking Statement to meet the requirements of the UK Modern Slavery Act.

Australian covered subsidiaries

- **Microsoft Pty Ltd** is a proprietary company limited by shares incorporated in Australia (Australian Business Number 29 002 589 460) with its registered address c/o Johnson Winter Slattery, Level 25, 20 Bond Street, Sydney NSW 2000. It is a wholly owned subsidiary of Microsoft Corporation and does not own or control other entities.
- **Microsoft Australia Holdings Pty Ltd** is a company limited by shares incorporated in Australia (Australian Business Number 16 077 573 390) with its registered address as c/o Johnson Winter Slattery, Level 25, 20 Bond Street, Sydney NSW 2000. It is a wholly owned subsidiary of Microsoft Corporation. It owns and controls Microsoft Datacenter (Australia) Pty Ltd which runs Microsoft's datacenters within Australia.
- **Microsoft Datacenter (Australia) Pty Ltd** is a proprietary company limited by shares incorporated in Australia (Australian Business Number 31 163 792078) with its registered address as c/o Johnson Winter & Slattery, Level 25, 20 Bond St, Sydney NSW 2000. It is a wholly owned subsidiary of Microsoft Australia Holdings Pty Ltd.
- **LinkedIn Singapore Pte Ltd** (Australia Branch office) is a private company limited by shares (company no. 201109821G). It was incorporated in Singapore and its registered address is 38 Beach Road #29-11 South Beach Tower, Singapore, 189767. LinkedIn Singapore Pte Ltd registered as a foreign company in Australia on October 22, 2016 (Australian Registered Body Number 73 615 253 408), with a registered address of Level 10, 50 Berry Street, North Sydney NSW 2060, Australia.

Although not a covered entity for purposes of the laws, GitHub Australia Pty Ltd, a proprietary company limited by shares incorporated in Australia (Australian Business Number 644 381 5282235) with its registered address as c/o Johnson Winter & Slattery, Level 25, 20 Bond St, Sydney NSW 2000, under the parent company of GitHub, Inc., is a wholly owned subsidiary of Microsoft Corporation and is voluntarily reporting its actions to prevent modern slavery and human trafficking in its operations and its supply chains through this Statement.

Microsoft is submitting this Statement on behalf of these Microsoft subsidiaries because they use the same Microsoft corporate policies and processes, operate in the same sectors, and have many shared suppliers.

Our mission

Microsoft's mission is to empower every person and every organization on the planet to achieve more. We strive to create local opportunity, growth, and impact in every country around the world. Our products and services help drive small business productivity, large business competitiveness, and public-sector efficiency. They also support new startups, improve educational and health outcomes, and empower human ingenuity. We continue to transform our business to lead in the new era of the intelligent cloud and intelligent edge. We bring technology and products together into experiences and solutions that unlock value for our customers.

Our business

Founded in 1975, Microsoft develops and supports software, services, hardware devices, and solutions that deliver new value for customers and help people and businesses realize their full potential. We offer an array of services, including cloud-based solutions that provide customers with software, services, platforms, and content, and we provide solution support and consulting services. We also deliver relevant online advertising to a global audience.

Our products include operating systems, cross-device productivity applications, server applications, business solution applications, desktop and server management tools, software development tools, and video games. We design and sell hardware devices, including personal computers, tablets, gaming and entertainment consoles, other intelligent devices, and related accessories (referred to as "devices" in this Statement). We construct, lease, and operate datacenters to pursue our business objectives worldwide, including in the UK and in Australia. More information about our business, organization, and operating entities can be found in our [FY22 Annual Report](#).

Our supply chains

In conducting our business, Microsoft has relationships with thousands of global suppliers - some of which are short-term suppliers while others have been Microsoft suppliers for many years. These relationships include, but are not limited to, suppliers that provide goods and services to our business units and corporate and subsidiary operations; suppliers that manufacture our devices, packaging materials, or components; and suppliers that construct and provide the servers and equipment used in Microsoft data centers.

In FY22, consistent with our One Microsoft approach and commitment to supply chain corporate social responsibility, Microsoft established the Supply Chain Integrity (SCI) Team. The SCI Team exists within the Corporate, External, and Legal Affairs (CELA) Technology & Corporate Responsibility (TCR) organization and is accountable for the company's overarching strategy with regards to supply chain due diligence standards and overseeing implementation of these requirements across Microsoft.

Microsoft governance and policies that address human rights, modern slavery, and human trafficking

Governance and consultation

The SCI Team establishes Microsoft's due diligence programs to address human rights risks in our global supply chains. The Team develops cross-company strategies and works with responsible sourcing and compliance teams across Microsoft operations and business units. The Microsoft business and operating units that are accountable for responsible sourcing issues, human rights reporting, and global supply chain compliance requirements include Microsoft Procurement; Azure Hardware Systems and Infrastructure (AHSI); Cloud Operations and Innovation (CO+I); Microsoft Devices; GitHub and LinkedIn. Additional teams accountable for responsible sourcing issues include Human Rights; Human Resources; and CELA.

The SCI Team regularly consults with senior CELA management and other compliance teams to raise corporate awareness of Microsoft's programs and policies. Through this cross-company collaboration, Microsoft is able to identify and eliminate forced labor and human trafficking risks that may be present in our operations and supply chains and to identify and implement opportunities for continuous improvement.

Microsoft's Board of Directors includes an Environmental, Social, and Public Policy (ESPP) Committee, formerly the Regulatory and Public Policy (RPP) Committee, that works in cooperation with Satya Nadella, Microsoft's CEO, his executive leadership team, and other leaders across Microsoft to oversee Microsoft's commitments to corporate social responsibility, including our commitment to prohibit human trafficking and forced labor in our corporate and subsidiary operations and in our global supply chains.

As One Microsoft, the SCI Team coordinates inter-company work to facilitate continuous improvement of Microsoft's human rights initiatives and policies related to responsible sourcing across the company and its global supply chains.

Standards of Business Conduct

The Microsoft Trust Code (also known as Microsoft's Standards of Business Conduct) defines our values and our corporate-wide commitment to ethical business practices and legal compliance. All Microsoft employees are required to comply with the Standards of Business Conduct in all countries where we operate. The Trust Code is available in multiple languages and dialects and is reinforced through online training, which is an annual requirement for all Microsoft employees. Employees across all business units are encouraged to report any known or suspected violations of the Trust Code to Microsoft's Business Conduct Hotline.

Microsoft Global Human Rights Statement

Our commitment to respect the human rights of our employees, customers, suppliers and individuals in the communities in which we operate is embedded in our Trust Code and further described in the Microsoft Global Human Rights Statement, available in multiple languages and dialects. The Microsoft Global Human Rights Statement adheres to the United Nations Guiding Principles on Business and Human Rights and the Global Network Initiative Principles and references our respect for specific international human rights instruments, including the International Covenant on Civil and Political Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Our statement, commitment, and approach to respecting human rights in all business activities, including in our operations and across our supply chains applies to Microsoft and all its subsidiaries.

The Microsoft Global Human Rights Statement articulates how we work to meet our responsibility to respect human rights by:

- Clearly stating our human rights policies and advancing these policies through our business operations and practices;
- Proactively engaging with stakeholders to obtain input to help evolve our approach;
- Actively participating in relevant human rights-focused collaborative initiatives, such as the Responsible Business Alliance (RBA) and the Business Roundtable on Human Rights and AI (artificial intelligence); and
- Communicating annually on the work we are doing to meet our human rights responsibilities through our Corporate Responsibility website and other transparency vehicles.

Microsoft Supplier and Partner Codes of Conduct

Microsoft suppliers, service providers, and sub-tier suppliers are contractually required to embrace our commitment to integrity and ethical behavior by complying with the Supplier Code of Conduct (SCoC). Available in multiple languages to meet the needs of our suppliers across the globe, the SCoC adheres to the procurement regulations put in place by the US Federal Government that restrict certain activities linked to human trafficking.

The SCoC is included as a standard onboarding and contractual requirement for all direct suppliers and service providers across Microsoft's supply chain. Direct suppliers are obligated by contract to hold their sub-tier suppliers accountable for meeting the SCoC. They must train annually and attest to their awareness of the requirements that safeguard working conditions and aim to prevent human trafficking in our supply chain by:

- Doing business ethically when it comes to anti-corruption, conflicts of interest, hiring practices, human rights, and honesty in business and corporate recording;
- Demonstrating respect and inclusion - ensuring accessibility, the ability to raise workplace concerns, and share our climate and environmental commitments;
- Protecting information, data, and Intellectual Property rights; and
- Ensuring privacy rules and regulations are met for all.

Microsoft is committed to maintaining a high standard on human rights and fair labor practices in its supply chain. When requested by Microsoft, supplier will provide necessary information and supporting documentation to enable Microsoft to perform and complete supply chain due diligence, including disclosure of certain information from subcontractors as may be required by Microsoft.

The Microsoft Partner Code of Conduct is a requirement of all Microsoft partners and their employees, agents, and subcontractors (collectively referred to as "Partners"), which work with Microsoft to serve Microsoft customers. While conducting business with Microsoft and Microsoft's employees, agents, subcontractors, and customers, Microsoft expects its Partners to commit to operating in full compliance with all applicable laws and regulations, and to adhere to the principles outlined in the Partner Code of Conduct.

Microsoft Partners are required to provide a safe and healthy work environment that is fully compliant with all employment, health, and safety laws. Microsoft Partners are also required to abide by local minimum wage and maximum working hour requirements and are prohibited from using forced labor or labor contracts that impose unreasonable limitations on a worker's ability to leave a Partner's employment. The use of child labor is explicitly prohibited.

Social and Environmental Accountability (SEA) Program and Responsible Sourcing of Raw Materials (RSRM) Policy
Microsoft's Social and Environmental Accountability (SEA) Program is at the core of Microsoft's manufacturing sustainability efforts. It ensures that Microsoft Devices hardware and packaging suppliers conform to Microsoft's SCoC and addresses additional requirements for worker living conditions, safe working practices, responsible sourcing of raw materials, and environmental, health and safety protection – which is further explained in the Microsoft Supplier Social and Environmental Accountability (SEA) Manual Excerpt H02050. Microsoft also requires suppliers to address the issues covered in our SEA specifications with their own upstream and downstream suppliers.

Microsoft's Responsible Sourcing of Raw Materials Policy (RSRM) extends our SCoC into our upstream supply chain in support of human rights, labor, health and safety, environmental protection, and business ethics at the smelter and minerals processor level. This commitment is global in scope and applies to priority substances used in Microsoft Devices hardware and packaging. The RSRM policy is informed by the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for

[Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#), which is the leading international standard for minimizing supply chain risk across raw material supply chains.

Preventing modern slavery and human trafficking in Microsoft's operations and supply chains

Preventing modern slavery and human trafficking in our operations and supply chains requires the engagement of key business sectors where we have determined there is potential risk of human trafficking and forced labor. [The United States Department of Labor's List of Goods Produced with Child Labor or Forced Labor](#) has identified the manufacture of electronics as posing a threat for child and forced labor. Therefore, our programs to minimize the danger of modern slavery and human trafficking primarily focus on Microsoft business units associated with the manufacture of Microsoft devices and hardware used in Microsoft data centers - particularly in high-risk countries where there are potentially vulnerable workers.

Other business units may face the risk of modern slavery practices and this Statement also covers the policies and procedures used by other business groups and covered subsidiaries to identify and prevent modern slavery and human trafficking in their operations and supply chains. We have centralized compliance and oversight in FY22 and are working to drive cohesion and consistency across our programs, where applicable. To make sure anyone can report a concern to us across all of our businesses, we also run a Business Conduct Hotline to address concerns that are received by phone, mail, email, fax, and our website. We provide FY22 findings and actions taken to remedy them aligned with our policies and procedures below.

Devices Responsible Sourcing Program
Devices hardware and packaging suppliers must meet the standards set out in the Microsoft SCoC, Supplier SEA Manual, and RSRM Policy, including those pertaining to freely chosen employment, child labor prohibitions, worker living conditions and wages, human rights, safe working practices, raw materials, and environmental, health and safety protection, through supplier contracts. The contracts also require Devices' suppliers to cascade these requirements to their sub-tier suppliers, with the intent of scaling and reinforcing these requirements across Devices' direct and indirect supply chains.

The Devices Responsible Sourcing (RS) Team implements a management system approach aligned to the [OECD Due Diligence Guidance for Responsible Business Conduct](#) that focuses suppliers on managing and mitigating risks in their operations and sub-tiers to address modern slavery and human trafficking risks. Data from global risk assessments and audit programs enable the RS Team to understand possible modern slavery and human trafficking risks in the Devices' supply chain and develop strategies and programs to address risks. New and directly contracted strategic Devices' hardware and packaging suppliers undergo initial risk and capability assessments and audits to assess their conformance to the SEA requirements.

The RS Team engages with suppliers to prevent forced labor in the Devices' supply chain through supplier policies and programs and monitors suppliers regularly. Auditors are trained to identify possible risks of forced labor. These indicators of forced labor include the payment of recruitment fees, withholding of identification papers, and others defined by the ILO (International Labor Organization) Indicators of Forced Labor.

If an indicator of forced labor is detected through the Devices audit program or Worker Hotline program, the RS Team investigates and works with suppliers to remediate the indicator of forced labor through corrective action, including taking steps to mitigate worker harm, prevent goods manufactured with forced labor from being sold or imported, and actions to suspend or terminate suppliers that use forced labor. The SEA Academy Program supports capacity building among suppliers and Microsoft employees to prevent forced labor issues and drive continuous improvement. In FY22, suppliers were provided online training and capability building to specifically address these issues.

Since Microsoft does not harvest or mine the raw materials that are used in Microsoft devices, Devices aims to influence upstream harvesting and mining through policies and practices to manage the risks inherent in raw materials extraction, harvesting, processing, refining and transportation. In FY22, the Devices team mapped high-risk materials, including tin, tantalum, tungsten and gold ("conflict minerals") and cobalt throughout the supply chain to trace the smelters and refiners through which they were processed and worked to ensure conformance with the Responsible Mining Initiative's Responsible Mining Assurance Process (RMAP). More information about mapping, smelters and refiners, and conflict minerals and cobalt used in Devices' supply chains can be found in the Microsoft Devices Smelter and Refiner List and Microsoft's 2022 Conflict Minerals Report.

Devices | Audit Findings and Remediation
The RS Team conducts assessments of potential new suppliers in the onboarding process to identify human rights and other risks, using third party auditors. Any identified risks are required to be addressed before supplier onboarding. The RS Team also requires existing suppliers to undergo regular audits to continue to closely monitor their compliance and continuous improvement. Third-party auditors and Responsible Sourcing PMs (program managers) review and verify supplier action plans of any identified non-conformances to ensure correction occurs within our strict timelines and sufficient evidence is provided for closure.

In FY22, where nonconformances were found, the Devices' Responsible Sourcing team worked closely with suppliers to develop corrective and preventive action with root cause analysis and, if needed, built supplier capabilities through training. The FY22 Devices Responsible Sourcing Report provides insight into audit findings for multiple areas.

FY22 top 10 non-conformance results included:

- Working hours - 241
- Occupational safety - 130
- Labor management systems - 123
- EHS management systems - 97
- Emergency preparedness & response - 82
- Hazardous substances - 51
- Wages and benefits - 46
- Industrial hygiene - 43
- Freely chosen employment - 25
- Air emissions – 23

There were no critical, serious, or major audit findings for the following areas:

- No policy or procedure that prohibits forced labor and human trafficking
- Forced Labor

- Retention of worker identity documents
- Involuntary overtime

In the category of freely chosen employment, audit findings were as follows:

- 1 Major: Contractual nonconformance
- 2 Major: Restrictions of workers' freedom of movement
- 1 Major: Restriction of workers' access to basic liberties
- 2 Serious and 14 Major: Paid recruitment or employment fees

A breakdown of the investigation and remediation actions taken to address the 16 audit findings associated with workers having paid recruitment or employment fees were as follows:

- 13 Findings: Workers paid a health exam fee as a condition of employment.
- 2 Findings: Foreign workers paid a recruitment fee as a condition of securing employment.
- 1 Finding: Worker not provided return transportation to his/her origin or reimbursed for cost of such trip after employment ended.

Of these 16 audit findings, all were either successfully corrected or are being corrected through reinforcement of our SEA requirements with nonconformant suppliers. In cases where nonconformances were detected, the RS Team also provided training to help suppliers strengthen their responsible recruitment practices to identify, prevent and mitigate forced labor related risks.

In cases where our audit findings determined that a factory employee paid recruitment or employment fees or were underpaid according to legal requirements, we required the nonconformant suppliers to repay employees for any recruitment or employment fees paid and/or insufficient wages based on local law and Microsoft requirements. In FY22, suppliers in Microsoft's Devices repaid $252,367 of recruitment fees and insufficient wages to 13,728 supplier employees, including $62,329 of recruitment fees to 6,888 supplier employees.

Devices | Giving workers a voice
All Devices' suppliers are required to set up an internal grievance mechanism as a part of the RS Team's supplier monitoring program. In addition, the RS Team continues to invest in a Workers' Voice Hotline to provide an external channel for workers to report concerns anonymously and without fear of retaliation. To ensure that workers are aware of the Hotline, suppliers are required to include information on the Hotline in their worker training curriculum. In FY22, 100% of audited factories in China had access to the Workers' Voice Hotline, covering 227 hardware final assembly and strategic component manufacturing supplier factories and 313,484 workers. More information on the program can be found in the Devices Responsible Sourcing Report.

Azure Hardware Systems & Infrastructure Program (AHSI)
The Azure Hardware Systems and Infrastructure (AHSI) Team is responsible for inventing, building, and delivering hardware infrastructure and global capacity for Microsoft's global cloud infrastructure. The AHSI Security, Risk & Compliance (SRC) team drives security and risk management through Microsoft's cloud infrastructure supply chain. In addition to the Microsoft Corporate policies and the Microsoft SCoC, AHSI has established a rigorous compliance architecture, the Advanced Security and Resiliency Architecture (ASRA), that establishes supplier requirements across various topics including labor and human rights, health and safety, environmental, and responsible business practices.

AHSI | Advanced Security and Resiliency Architecture (ASRA) requirements

In July 2021, AHSI launched the Advanced Security & Resiliency Architecture (ASRA), which deploys risk-based, independent supplier assessments to determine supplier rigor in multiple areas of their operations. ASRA requirements extend leading human rights standards, such as the Responsible Business Alliance Code of Conduct and the United Nations (UN) Guiding Principles on Business and Human Rights, to the AHSI supply chain. Historically, AHSI was a component of Devices, and therefore covered by Devices' assessments and due diligence procedures. This is the first year AHSI and Devices are reporting as separate business units.

ASRA Labor and Human Rights requirements include risk detection and remediation, reporting, child labor, working hours, wages and benefits, humane treatment, non-discrimination, and freely chosen employment. Health and Safety requirements address workplace safety, hazards, product safety, and monitoring and reporting. ASRA environmental requirements address hazardous substances, waste management, sustainability including emissions, and product design, which include the sourcing of raw materials.

ASRA requirements are communicated directly to AHSI contracted suppliers and align with Microsoft requirement that all suppliers ensure their sub-tier suppliers, partners, and contractors are aware of and adhere to these requirements.

AHSI | Assessment Findings

ASRA classifies severity of supplier nonconformance findings as Critical, High, Moderate, and Low; and the level of the finding determines the timeframe for remediation and sets the time by which suppliers must correct findings. In FY22, an audit was conducted with a focus on three primary domains: Labor & Human Rights, Health & Safety, and Environmental. In future reporting years, ASRA findings will be published in a similar manner to that of Devices' findings as Microsoft continues to integrate due diligence programs across business units.

Cloud Operations + Innovation's supplier human rights strategy

CO+I continued to enhance its Human Rights and Fair Labor Practices program to mitigate supplier-related human rights risks in its global supply chain in FY22. CO+I steered improvements to the programmatic human rights due diligence conducted on high-risk suppliers during various stages of the supplier lifecycle, including sourcing and annual business reviews. Finally, CO+I matured its audit capabilities related to high-risk supplier engagements to drive compliance with Microsoft and CO+I's human rights-related policies and standards.

Microsoft Procurement

All Microsoft suppliers, including those managed by Microsoft Procurement, are contractually obligated to abide by the Microsoft SCoC. The SCoC outlines Procurement's overarching requirement that Microsoft suppliers respect all human rights and prohibit abuses ranging from discrimination and harassment to forced labor. Procurement conducts periodic due diligence reporting of high-risk supplier populations to proactively monitor for any SCoC violations. Additionally, Microsoft employees can request an on-demand due diligence report of any supplier, allowing Microsoft to respond to concerns in real time. Supplier employees can voice concerns anonymously at any time through our online Business Conduct Hotline, via phone, or by mail. If Procurement confirms violations, either from monitoring or from the Hotline, the team takes targeted action to remediate such violations.

GitHub

GitHub takes its responsibility to ensure that neither modern slavery nor child labor takes place in its supply chain or in any part of its business seriously.

GitHub does not conduct manufacturing or produce hardware, nor does GitHub use recruitment agencies for the kinds of services often performed by migrant workers. The nature of GitHub's business does not subject it to sudden changes in workload or pricing pressures, which often drive demand for practices that increase the risk of forced labor in supply chains, such as forced overtime. GitHub's supply chain consists of goods and services for its products and operations including computing services, event planning, purchase of retail and promotional items, office supplies, and leasing of facilities such as office space and data centers.

GitHub's Statement Against Modern Slavery and Child Labor describes GitHub's policies in relation to modern slavery and child labor, labor policies and practices, and due diligence processes. Furthermore, GitHub's contracts require its suppliers to agree to comply with its Statement, which includes assuring that they have practices consistent with its Statement and compliant to laws related to modern slavery or child labor.

LinkedIn

LinkedIn prohibits the use of involuntary or forced labor by suppliers. Although LinkedIn is not engaged in manufacturing, business nonetheless carries a risk of encountering human rights violations. Accordingly, LinkedIn requires business partners to go through a detailed screening process designed to identify possible compliance issues.

LinkedIn requires all third-party suppliers doing business with LinkedIn to adhere to standard services agreements under which they are required to comply with the Code of Conduct for Doing Business with LinkedIn ("Provider Code") and to prohibit their affiliates, subcontractors, and extended supply chain from engaging in corrupt business practices and violations of human rights.

LinkedIn requires that its suppliers:

- Respect and enrich global communities by using only voluntary labor;
- Fairly compensate workers for the work performed on behalf of LinkedIn;
- Prohibit the use of child labor and all forms of forced or compulsory labor, not only in their own operations but in those of their affiliates, subcontractors, and extended supply chain; and
- Respect employee rights of association and collective bargaining, consistent with local laws.

Learn more about LinkedIn's commitments on the LinkedIn Customer Information Portal.

In addition, LinkedIn provides all third parties and their delegates with access to LinkedIn's Integrity Helpline and Microsoft's Business Conduct Hotline for reports of actual or suspected misconduct.

Microsoft engagements that fight modern slavery and human trafficking

We recognize that modern slavery and human trafficking are systemic issues with many complex causes. In addition to our direct efforts to prevent modern slavery and human trafficking in our corporate and subsidiary operations and in our global supply chains. Microsoft recognizes the importance of empowering other organizations and individuals to lend a hand in this fight too. Through the contribution

of technology, targeted funding, and employee volunteerism, organizations working in this space are increasingly seeing positive outcomes. The following engagements and projects are examples of collaborative efforts sponsored by Microsoft and its employees in the fight against modern slavery and human trafficking:

- Microsoft is a founding member of Tech Against Trafficking (TAT) – a coalition of technology companies working with civil society organizations to help combat human trafficking and increase survivors' access to resources. Microsoft contributions to TAT activities include participating in the steering committee, leading workstreams in annual accelerator programs, providing technology outreach to anti-trafficking NGOs, developing an interactive map of anti-trafficking technology tools, and supporting policy engagement with government audiences (including testimonies at two US congressional hearings).

- Project TIRA (Trafficking Interruption Resource Agent), which offers advocates and victims of sex trafficking an accurate and real-time view of the available resources that are applicable to their unique needs. TIRA leverages Microsoft's Azure Bot Services and Language Understanding (LUIS) Cognitive services with text-based mobile interaction to ensure easy engagement and an accurate inventory of available services. TIRA also leverages Azure Defender for Cloud to secure and provide a trusted platform. To date, TIRA has onboarded 81 service providers and 82 services.

- Microsoft supports a software-as-service (SaaS) platform called Freedom Signal, which allows advocates to directly reach out to potential victims of sex trafficking via text messages, offering help when an ad for sex is placed online. With Freedom Signal, victims do not have to self-identify or search for help on their own; nor are victims dependent on getting a referral through the criminal justice system. Microsoft's support of this innovation comes through employee skill-based volunteering, grants, and donations of Azure and Cognitive Services. Freedom Signal is used by nonprofits, social services organizations, and other government agencies in North America to target and amplify their outreach to people in need.

- Missing Children Society of Canada (MCSC) and Microsoft are aiding police and families in active and continuing searches for missing children across the country through our technology and services in conjunction with Microsoft Partner ESRI. MCSC is a web app established in 2019 that helps find missing children in Canada faster by allowing the public to participate in the search. Users of the app can access information about missing children in Canada, sign up for SMS text alerts about new cases in their area, and offer tips about existing cases.

- Thorn and Microsoft have been working together for several years to fight child exploitation and human trafficking. In addition to sharing PhotoDNA technology with Thorn, Microsoft has provided technology and volunteers in support of a project originally called "Child Finder Service." This project emerged from Microsoft hackathons initiated in 2015 and 2016 and culminated in the donation of Microsoft technology to Thorn for inclusion in its Spotlight product. Similar innovations have since been iterated by other technologies to help find missing children faster.

  Microsoft donated PhotoDNA to the National Center for Missing & Exploited Children (NCMEC). NCMEC is the US clearinghouse and comprehensive reporting center for all 29 issues related to the prevention of, and recovery from, child victimization, including abduction, abuse, and exploitation. NCMEC's CyberTipline provides public and electronic service providers with the

ability to report instances of online enticement of children for sexual acts and child exploitation material. In 2015, Microsoft made PhotoDNA available as a service on Azure. Microsoft continues to provide this valuable technology for free to qualified organizations, including technology companies, developers, and non-profit organizations, for the purpose of combatting child exploitation. Microsoft has also provided PhotoDNA for free to law enforcement, primarily to forensic tool developers.

- [iRespond](#) is an organization that creates biometric tracking solutions that will enable a ubiquitous and verifiable identity that can be used to disrupt human trafficking and prevent humanitarian incidents. This solution is built upon the efforts of Microsoft and others in the development of ID2020. ID2020 represents a consortium of private sector and nonprofit partners that are exploring the development and deployment of digital identities to the 1.1 billion people in the world who lack the ability to verify themselves. Microsoft and Accenture are founding partners of these initiatives, providing grants and a monitoring and evaluation framework for digital identification pilot deployments by a range of organizations around the world.

Microsoft's employees engage in skills-based volunteering in this space and, as a company, Microsoft donates technology products and collaboration services to help nonprofits and other organizations around the world to create a pipeline of innovations such as the ones described above. No single company can address this problem. Instead, we must continue working together in a boundary-less manner to make a greater impact.

Our ongoing commitment

Microsoft recognizes our responsibility to respect human rights and meet our commitment to prohibit human trafficking and forced labor in our corporate and subsidiary operations and in our global supply chains. Going forward, we commit to the following actions:

- We will improve and enhance existing governance, risk assessment, and due diligence activities, policies, programs, trainings, and tools across the company to minimize the risk of forced labor in our operations and our supply chains.
- We will build Microsoft's supplier engagement on topics related to slavery and human trafficking and forced labor through supplier forums, webinars, trainings, and resources for internal and external stakeholders.
- We will further our engagement with relevant industry groups and external stakeholders to define and improve industry best practices and build supplier awareness of forced labor, modern slavery, and human trafficking risks and remediation actions.
- We will promote collaboration, information sharing, and benchmarking across Microsoft to ensure that human rights risks are assessed in a complimentary and consistent manner and to mitigate the risk of modern slavery and human trafficking in our operations and business supply chains.
- We will develop and use technology and contribute to technical and philanthropic efforts to address the root causes of modern slavery and human trafficking.
- We will evolve our corporate policies and procedures to reflect changes in international human rights law, including a declaration by the United Nations Human Rights Council that access to a clear and healthy environment is a basic human right.

We recognize that, given the diversity and complexity of local conditions and laws worldwide and the number of stakeholders involved in modern supply chains, our knowledge and ability to affect change will not be perfect. We therefore invite all readers of this Statement to engage with us in dialogue to help drive improvements in our implementation and performance. For more information on our efforts, please visit www.microsoft.com/csr.