

Statement Against Slavery and Human Trafficking

FY2025

Contents

- 1. Reporting Entity 14
- 2. Steps Taken During Reporting Period 14
- 3. Structure, Operations, and Supply Chain 15
 - Structure 15
 - Operations 16
 - Supply Chain 16
- 4. Identification of Risks of Modern Slavery Practices in Our Operations and Supply Chain 16
 - Risks in Our Operations 16
 - Risks in Our Supply Chain 17
- 5. Actions Taken to Assess and Address Modern Slavery Risks Including Policies and Due Diligence Processes 17
 - Assessment of Risks 17
 - Addressing Risks 18
- 6. Remediation Measures 19
- 7. Training and Accountability 19
- 8. How the Effectiveness of Actions Taken is Assessed 20
- 9. Consultation Process 20
- 10. Other Relevant Information 21
- Approval of Statement 21
- Appendix 1 22



Pure Storage is committed to corporate, social, and environmental responsibility, including ensuring its employees and suppliers take appropriate measures to help mitigate the risk of human trafficking and slavery within its global supply chain. Pure Storage does not tolerate forced labor, indentured labor, involuntary/child labor, or any other form of human trafficking by any Pure Storage supplier or for any purpose.

This Statement is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "**Canadian Act**"), the Modern Slavery Act 2018 (Cth) (the "**Australian Act**"), the Modern Slavery Act of 2015 (the "**United Kingdom Act**"), and the Transparency in Supply Chains Act of 2010 (the "**California Act**") for the Pure Storage financial year/reporting period of February 5, 2024 – February 2, 2025 ("**Reporting Period**"). The reporting requirements of the Canadian Act, the Australian Act, the United Kingdom Act, and the California Act are summarized in the table attached as [Appendix 1](#).

1. Reporting Entity

Pure Storage, Inc. (USA) and each of its relevant controlled foreign subsidiaries (listed immediately below) are collectively referred to herein as "**Pure Storage**" and/or the "**reporting entity**" covered by this Statement:

- Pure Storage, Inc. (EIN 27-1069557) for the purposes of the California Act,
- Pure Storage, Inc. (ABN 97 281 568 551) and Pure Storage Australia Pty Ltd (ABN 86 164 489 794) for the purposes of the Australian Act,
- Pure Storage, Inc. and Pure Storage Canada Limited (BN 808214431) for the purposes of the Canadian Act, and
- Pure Storage, Inc. and Pure Storage UK Ltd (RN 08268206) for the purposes of the United Kingdom Act.

The terms "**we**," "**us**," and "**our**" refer to Pure Storage, except where context otherwise requires.

2. Steps Taken During Reporting Period

To expand our focus on responsible sourcing, we implemented the following actions during the Reporting Period:

- **Policies:**
 - Ensured our [Supplier Code of Conduct](#), aligned with Responsible Business Alliance ("**RBA**") Code of Conduct 8.0, is embedded throughout our onboarding, contracting, training, and other engagement with suppliers.
 - Strengthened our Sustainable Procurement Policy.
- **Due diligence:**
 - Implemented enhanced due diligence of all direct suppliers and select second tier suppliers for sanctions, watchlists, human rights and forced labor, ownership, reputational, and other risk areas in partnership with a Gartner Magic Quadrant leading supplier risk SaaS provider.
 - 100% of new suppliers certify our Supplier and Business Codes of Conduct or equivalent code (e.g., RBA Code of Conduct).
- **Sustainability scorecard:** We engaged 100% of our key strategic suppliers through our sustainability scorecard, reinforcing alignment on environmental, labor, and business ethics priorities. We worked with them closely throughout the Reporting Period to drive progress in their scores.
- **Policy acknowledgment:** 100% of our Tier 1 Production Sites¹, which in total account for over 70% of our direct supply chain vendor spend, have acknowledged our Supplier Code of Conduct or the equivalent RBA Code of Conduct.



- **Training:** We expanded our internal and external (supplier) training offerings, including an emphasis on Human Rights and Forced Labor:
 - Internal: Over 85% of relevant Pure Storage procurement and operational employees have completed our training on Sustainability, Sustainable Procurement, and Forced Labor Identification and Risk Mitigation. Furthermore, all Pure Storage employees receive training on our [Code of Conduct](#) and business ethics at onboarding, and all employees must review and recertify compliance with our Code of Conduct and key policies annually.
 - External: We designed and launched training for suppliers, including Human Rights and Forced Labor as well as recertification of our Code of Conduct. 80% of targeted (key strategic) suppliers completed the training within the campaign window, and we received numerous additional voluntary training completions by other suppliers that we have engaged with on our supply chain policies relating to environmental matters.
- **Monitoring and auditing:** Our Tier 1 Production Sites were assessed through the RBA and hold RBA Validated Assessment Program² (“VAP”) Platinum level certification. Similarly, all key strategic suppliers were audited under the RBA VAP program and achieved Silver VAP certification or above, with zero critical corrective actions.
- **Monitoring and auditing continued:** We continued our audit program, enabling our risk and compliance professionals to visit suppliers and engage in follow-up discussions about VAP audit outcomes, governance, and compliance with sustainability requirements, in addition to the aforementioned third-party VAP site audits.
- **Depth of engagement:** Our engagement with suppliers expands well beyond first-tier suppliers; contract acknowledgment, due diligence, VAP activities, and/or other sustainability engagements cover several important component suppliers (second tier) that supply our contract manufacturers.
- **Program ratings and review:**
 - Recognition: Significant S&P Global Corporate Sustainability Assessment progress in our scoring for Labor Practices (score of 84 against an average of 32) and Human Rights (score of 64 against an average of 35). Pure Storage holds bronze level recognition from Ecovadis³ from the 2024 Reporting Period and anticipates receiving scores that demonstrate strong progress in our Human Rights and Ethical Sourcing programs during the current Reporting Period.
 - Independent maturity assessment: As part of our commitment to continuous improvement, a large public consultancy firm performed an Ethical Supply Chain/Sustainable Procurement maturity assessment against leading practices to identify opportunities to enhance our program. We continue to assess and implement leading practices based on this work.

3. Structure, Operations, and Supply Chain

Structure

Pure Storage, Inc. (USA) is a public company listed on the New York Stock Exchange and has the following current general business structure:

- The Board consisting of:
 - Chairman and Chief Executive Officer
 - Founder and Chief Visionary Officer
 - Non-executive Board Member x 8
- The Executive Staff consisting of:
 - Chief Executive Officer
 - Founder and Chief Visionary Officer
 - Chief Product Officer
 - Chief Revenue Officer
 - Chief Administrative and Legal Officer



Operations

Our corporate headquarters are located in Santa Clara, California. We also maintain offices and inventory depots in multiple locations in the United States and internationally in Africa, Asia, Australia, Europe, and North and South America.

Pure Storage has worked to redefine the industry with an unmatched data storage platform that helps organizations reduce the complexity, increase the reliability, mitigate the risks, and reduce the costs of their data infrastructure. Pure Storage products principally consist of software and some related hardware solutions and technologies. Pure Storage data solution products enable SaaS companies, cloud service providers, and enterprise and public sector customers to deliver real-time, secure data to power their mission-critical production, DevOps, and modern analytics environments in a multicloud environment. One of the fastest growing enterprise IT companies, Pure Storage enables customers to quickly adopt next-generation technologies, including artificial intelligence and machine learning, to help maximize the value of their data for competitive advantage.

Pure Storage is an active member of the RBA and has adopted the RBA Code of Conduct as the foundation of its Supplier Code of Conduct. The standards set out in the RBA Code of Conduct reference international norms and standards including the United Nations Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises, ISO and SA standards, and others. The RBA Code of Conduct requires its members to meet the strictest requirements between the code itself and laws and regulations, including prohibition of forced labor, child labor, involuntary prison labor, and human trafficking.

At Pure Storage, we recognize the profound impact that responsible sourcing and manufacturing has on our planet, communities, and the sustainability of our products. Pure Storage is committed to not just meeting but exceeding the evolving expectations of our stakeholders for a more sustainable and responsible global supply chain.

Supply Chain

Pure Storage outsources all manufacturing operations to contract manufacturers. Our contract manufacturers manufacture, assemble, test, and package our products in accordance with our specifications and are primarily located in the Americas and Eastern Europe. We provide our contract manufacturers with a rolling forecast for anticipated orders, which our contract manufacturers use to build finished products. The product mix and volumes are adjusted based on anticipated demand and actual sales and shipments in prior periods. We work closely with our contract manufacturers to meet our product delivery requirements and to manage the manufacturing process and quality control. We and our contract manufacturers are active members of the RBA supporting continuous improvement in the social, environmental, and ethical responsibility of our supply chain.

Our supply chain also includes the suppliers of products and services that would typically be required by offices for administration, sales and marketing, and research and development as well as inventory depots located around the world.

4. Identification of Risks of Modern Slavery Practices in Our Operations and Supply Chain

Risks in Our Operations

Our internal processes have found no evidence of any modern slavery practices or incidents in our operations, and we partner with contract manufacturers that are active members of the RBA to perform manufacturing, which mitigates our direct risk. We are aware of general industry risks, such as migrant workers, child labor, modern slavery, and unsafe working conditions, and no incidents have been reported through our active grievance (whistleblower) hotline.

Pure Storage has pledged to respect human rights, covering topics such as forced labor, slavery, child labor, and human trafficking. We practice the principles embodied in the RBA Code of Conduct, which prohibits the use of forced labor,



indentured labor, or involuntary/child labor and human trafficking. The RBA Code of Conduct outlines requirements covering the absence of slavery and human trafficking, to include compliance with global labor standards and applicable laws (e.g., worker health and safety, the environment, business ethics). Our internal policies and practices such as our Code of Conduct require compliance with the RBA Code of Conduct and are consistent with international labor and human rights standards.

Risks in Our Supply Chain

We are not aware of any information that suggests any of our suppliers had (or were aware of) any instances of modern slavery in their operations or supply chains, though we are aware of general industry risks in extended operations and supply chains through multiple tiers of global sub-supplier engagement. As generic examples defined by the International Labour Organization, this may include bonded labor, indentured labor, involuntary prison labor, slavery, and trafficking of persons. This may also include foreign migrant worker risks, such as recruitment fees being solicited, inability to review or interpret labor agreements, passport confiscation, or lack of return transportation to home countries. Pure Storage expects its suppliers' conduct to adhere to the highest ethical principles, as described in our Supplier Code of Conduct. We continuously engage with key manufacturing partners, component suppliers, and other partners to drive awareness of and alignment to our expectations.

Pure Storage requires adherence to RBA's governing principles with key strategic suppliers renewing business. Furthermore, during the Reporting Period and onwards, all suppliers are required to certify our Supplier Code of Conduct or equivalent pledge via our onboarding questionnaire tool during the onboarding and screening process. We are also committed to complying with the changes to the U.S. Government's Federal Acquisition Regulation with regards to Combating Trafficking in Persons and expect our suppliers to similarly be in compliance. We work with our supply chain to create an environment where workers may freely choose employment. This focus on labor and worker rights is part of a larger effort around supply chain transparency and accountability.

5. Actions Taken to Assess and Address Modern Slavery Risks Including Policies and Due Diligence Processes

Assessment of Risks

Pure Storage is dedicated to ethical business practices globally, respecting human rights and adhering to all applicable laws and regulations.

We have implemented and embedded an ongoing program to continuously improve our visibility into the labor practices in our supply chain and our ability to identify, assess, and address risks of modern slavery practices in our operations and supply chain (the **"Modern Slavery Risk Mitigation Program"**).

Our Modern Slavery Risk Mitigation Program is intended to be continuously reviewed and improved as time goes on and currently includes:

1. Policies and statements: Our Statement Against Slavery and Human Trafficking, Business Code of Conduct, Sustainable Procurement Policy, Supplier Code of Conduct, and "Speak Up!" program. Each statement and policy specifically addresses our commitment to be vigilant regarding modern slavery issues, while the Speak Up! program strongly encourages employees, suppliers, and other stakeholders to report all concerns and violations of our policies. The program provides clear reporting mechanisms via multiple channels, which assures that there will be no retaliation for reporting concerns.
2. Contract language: Our Master Supply Agreement ("**MSA**") template includes language requiring compliance to the RBA Code of Conduct, ensuring our key strategic suppliers align with the RBA requirements around human rights and forced labor and perform continuous monitoring. Management has approved a requirement in the MSA for new suppliers to comply with the Pure Storage Code of Conduct as well as the Pure Storage Supplier Code of Conduct. Key strategic suppliers are required to acknowledge and demonstrate their compliance with both Codes of Conduct during audits.



3. Audits: We utilize a multi-faceted audit approach, including use of third-party audits, Pure Storage-led audits, and supplier self-assessments.
 - Third-party: The RBA VAP program performs audits across all Tier 1 Production Sites, including an assessment of risk areas and potential corrective actions, including human trafficking as a key topic area.
 - Pure Storage-led: Pure Storage risk and compliance professionals additionally perform onsite audits at key strategic supplier sites.
 - Self-assessment: We also require additional key strategic suppliers to take the RBA self-assessment questionnaires, which include a self-assessment of conformance with the RBA Code of Conduct. This includes an evaluation of the supplier's policies and practices that may increase risks related to human trafficking.
4. Depth of engagement: Our list of key strategic suppliers includes several critical component suppliers that sell to our Tier 1 Production Sites, which increases the depth of our supplier engagement.
5. Onboarding/screening: We perform a rigorous onboarding/screening process using third-party technology tools and internal resources to reduce the risk of engaging with unethical companies. Management has approved the enhancement of the supplier screening process to include an expanded assessment of modern slavery risk when a new supplier is identified and onboarded.
6. Sustainability scorecard: Our quarterly evaluation of suppliers includes a sustainability scorecard for key strategic suppliers, driving mutual engagement and progress on their journey.
7. Expanded training: We deployed training for the Modern Slavery Risk Mitigation Program to our own employees as well as suppliers to ensure they have the knowledge and tools to identify and report risks and that we have mechanisms in place to hold our personnel and suppliers accountable via binding policies and contract obligations.
8. External assessments: We work with subject-matter experts, internationally recognized sustainability rating firms, and the prior noted independent consulting firm assessment to continuously measure our program against leading practices and identify improvement opportunities.
9. To mitigate internal risks, Pure Storage undertakes a number of steps, including:
 - Ensuring all employees receive employment contracts or offer letters detailing wages and work hours and are provided with pay slips;
 - Ongoing engagement with employee representation groups;
 - Monitoring of changes in employment legislation related to compensation and working hours; and
 - Maintenance of commercial agreements with contingent workforce providers, ensuring they uphold suitable policies, including a Human Rights Policy.

Addressing Risks

Each Reporting Period, key actions are taken in connection with the Modern Slavery Risk Mitigation Program, with the Reporting Period summarized in Section 2. Pure Storage also took the following actions:

- Screening: We enhanced our robust supplier screening process using third-party technology tools and our internal resources as part of our onboarding protocol, including comprehensive due diligence and risk assessments across multiple domains such as sanctions and watchlists, ethical business practices, diversity, data privacy, and information security. We actively pursue complete responses to our due diligence inquiries until Pure Storage is satisfied that suppliers have fully complied. Those suppliers that fail to respond in a timely and transparent manner will be considered in breach of their obligations to Pure Storage and could be subject to losing their contracts and payment of damages.



- RBA collaboration: We actively participate in the RBA, leveraging cross-industry collaboration to align suppliers with clear, consistent, and attainable standards. Our involvement with the VAP ensures independent onsite verification of compliance across labor rights and other RBA Code of Conduct attributes through third-party audits. All our Tier 1 Production Sites were covered by VAP audits.

It is understood that we remain on a modern slavery risk identification and mitigation journey with our suppliers, and we expect that our visibility into modern slavery risk in the supply chain will improve and that corresponding mitigation actions will be completed as we continue that journey. Our Modern Slavery Risk Mitigation Program has been designed—and will continue to be refined—with that in mind and with a view to bring our entire supply chain with us on that journey to the greatest extent feasible.

6. Remediation Measures

As there have been no known instances of modern slavery identified in our business operations and/or supply chain, remediation measures for any forced labor or child labor or for loss of income to the most vulnerable families are currently not required. However, we note general industry foreign migrant worker risk, and the need to implement remediation measures will continue to be monitored, with a focus on risk identification and ensuring there are appropriate investigation channels to verify any matters that arise (see six steps below).

The Walk Free⁴ human rights organization provides a six-step process that we have adopted as a framework for guiding our approach to these issues, though we perceive our risk to be low:

1. Investigate and verify
2. Remediate harm to workers
3. Mitigate and prevent future harms
4. Escalation
5. Incident reporting & tracking
6. Review

7. Training and Accountability

Pure Storage is passionate about maintaining the highest standards of business conduct and ethics, guided by its Code of Conduct. All Pure Storage employees complete a Code of Conduct and business ethics training during their onboarding process. Furthermore, all Pure Storage employees annually recertify their review and acknowledgment of six key policies, including the Code of Conduct, which includes topics such as Respecting Human Rights, Environmental Stewardship and Responsibility, Anti-discrimination, Diversity, and a Safe Working Environment. The Code of Conduct is available in 10 different languages.

During the Reporting Period, we enhanced the content of our relevant training courses to include additional anti-human trafficking and modern slavery guidance to both Pure Storage employees and its suppliers.

- Pure Storage has developed and deployed three courses to cover these topics—Sustainability, Sustainable Procurement, and Labor, Human Rights, Modern Slavery, Forced Labor – Risk Detection and Mitigation. As part of additional annual training, buyers and leadership of the supply chain and procurement teams are assigned to complete these courses. During the Reporting Period, over 85% of our assigned procurement, supply chain, legal, and leadership representatives completed the training. Our expectations around compliance with labor laws, human rights, and the RBA Code of Conduct and Pure Storage Supplier Code of Conduct are further highlighted in these materials.



- Supplier Labor, Human Rights, Anti-corruption, Supplier Code of Conduct: In the Reporting Period, we designed and launched a capacity-building training for targeted suppliers. 80% of targeted (key strategic) suppliers completed the training within the campaign window, and we received numerous additional voluntary training completions by other suppliers that we have engaged with on our supply chain policies relating to other environmental matters.

Should any policy breaches be detected, personnel would be subject to our progressive discipline procedures, up to and including termination of employment. Suppliers that breach their contractual commitments to the Modern Slavery Risk Mitigation Program could be subject to losing their contracts and payment of damages.

8. How the Effectiveness of Actions Taken is Assessed

Pure Storage is implementing key performance indicators (“**KPIs**”) to measure how effective our actions to assess and address modern slavery practices in any part of our operations and supply chain have been. KPIs include:

- RBA VAP audit scores of Tier 1 Production Sites and key strategic suppliers,
- Training metrics for relevant Pure Storage functions and Pure Storage suppliers,
- Operations notifications—reported issues in business operations,
- Our certification scores and recognition for Human Rights and Responsible Sourcing (e.g., Ecovadis),
- Our key strategic supplier sustainability scorecard results,
- Our internal and external training statistics,
- 100% certification of Pure Storage Supplier and Business Codes of Conduct or equivalent for all new suppliers at onboarding,
- Our whistleblower hotline and grievance mechanism case metrics related to any forced labor or modern slavery matters.

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions.

In addition to the KPIs, Pure Storage also takes qualitative evidence derived from the actions described above and reviews it to determine if the supply chain response seems to be having the intended effect and moving in the right direction.

9. Consultation Process

During the Reporting Period this Statement covers, we actively engaged and communicated with all members of Pure Storage in the development of this Statement.

All members of Pure Storage participated in providing the information relevant to their respective sites, operations, and supply chains as required for the risk assessment actions noted above in this Statement, as well as consulting and/or liaising with respect to communications with the suppliers in their respective operational supply chains who were subject to a modern slavery due diligence review.

All members of Pure Storage will have accountability for the execution of action plans and standard actions relating to their respective suppliers and will be kept apprised of the activities and outcomes noted in this Statement.



10. Other Relevant Information

In addition to continuing to take the actions indicated by our Modern Slavery Risk Mitigation Program and further embedding it into our company processes and culture, we will be considering ways we may enhance the program.

Ensuring that modern slavery and human trafficking are not taking place anywhere in our supply chain, and especially at tiers beyond our direct (first-tier) suppliers, will likely remain a significant ongoing challenge for the foreseeable future. However, we have implemented new tools and technology, are exploring further capabilities for additional visibility and insights, and will continue to take a risk-based approach. Our commitment to continuous improvement will also include consulting our independent subject-matter experts, externally available human rights/forced labor data, and program guidance (e.g., ILO, UNGP) with a commitment to achieving continuous improvement through the actions described in this Statement.

Approval of Statement

In accordance with the requirements of the Canadian Act, and in particular Section 11 thereof, the governing body with legal authority to bind Pure Storage Canada Limited has approved this Statement on May 21, 2025 and signed by an officer.

For the purpose of the Australian Act, the principal governing body of Pure Storage Australia Pty Ltd has unanimously approved this Statement on May 21, 2025 and signed by a director.

For the purpose of the United Kingdom Act, this Statement has been approved by the board of Pure Storage UK Ltd. on May 21, 2025 and signed by a director.

This Statement was approved by the board of parent entity Pure Storage, Inc. on June 11, 2025 and signed by a designated representative of Pure Storage, Inc.



Appendix 1

Table 1. Reporting requirements quick reference

Section of this report	Canadian Act	Australian Act	United Kingdom Act	California Act
1		(1) Reporting entity		
2	(1) Steps taken during the financial year			
3	(2) Structure, activities, and supply chains	(2) Structure, operations, and supply chain	(1) Organisation structure and supply chains	
4	(4) Risk	(3) Risk		
5	(3) Policies and due diligence processes		(2) Policies and (3) due diligence processes	
5	(4) Steps to assess and manage risk	(4) Actions taken to assess and address risk	(4) Risk assessment and management	(1) Verification to evaluate and address risks
5				(2) Audits to evaluate
5				(3) Supplier certification of materials complying with local laws
6	(5) Measures to remediate any forced labour or child labour			
6	(6) Measures to remediate loss of income			
7	(7) Training		(5) Training	(4) Training
8	(8) How effectiveness is assessed	(5) How effectiveness is assessed	(6) Key performance indicators to measure effectiveness	(5) Internal accountability standards
9		(6) Consultation process		
10		(7) Other relevant information		

1 First level of direct suppliers or production facilities that manufacture finished products
2 <https://www.responsiblebusiness.org/vap/about-vap/>
3 <https://support.ecovadis.com/hc/en-us/articles/210460227-Understanding-EcoVadis-Medals-and-Badges>
4 <https://www.walkfree.org/>

