

Cisco Norwegian Transparency Act Disclosure

At [Cisco](#), we are committed to treating employees and workers with dignity and respect. We work with partners in our industry and our supply chain to drive robust industry standards and increase our positive impact.

This statement is designed to meet Cisco's reporting obligations under the Norwegian Transparency Act. This statement applies to Cisco Systems Norway AS ("Cisco Norway"). Cisco and its subsidiaries, including Cisco Norway, share the same core business operations and supply chains, human rights policies, and supporting processes, which are further described in this statement. This statement covers Cisco's Fiscal Year 2023 (FY2023) starting on July 30, 2022, and ending on July 29, 2023.

About Cisco's Structure and Business Operations

Cisco is a multinational company incorporated in Delaware and headquartered in San Jose, California, United States of America. We conduct business operations globally from more than 400 offices worldwide.

Cisco designs, manufactures, and sells networking and other products related to the communications and information technology industry and provides services associated with these products and their use. We had approximately 84,900 full-time employees as of July 29, 2023; 539 of these were full-time employees of Cisco Norway. We conduct significant sales and customer support operations in countries around the world. We sell our products and services both directly and through a variety of channels with support from our salesforce.

About Our Supply Chain Network

We source from a global network of suppliers and partners to produce and transport Cisco products. We refer to these suppliers as our direct supply chain. We have categorized these suppliers into three types: manufacturing partners, component suppliers, and logistics and service providers as further described below:

- **Manufacturing partners:** a select group of suppliers that produce finished Cisco products.
- **Component suppliers:** a wide group of suppliers, often contracted directly by Cisco to provide parts to our contract manufacturing partners according to our specifications.
- **Logistics service providers:** a group of providers that transport components and finished products.

Cisco also works with a network of suppliers that provide goods and services that support Cisco's operations. We refer to these suppliers as our indirect supply chain.

Our Due Diligence Approach

Cisco works to address human rights risks through human rights due diligence and human rights impact assessments to identify, prevent, and mitigate such risks. Cisco uses the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Business Conduct (OECD Guidance) and the UN Guiding Principles on Business and Human Rights (UNGPs) as the basis for our [due diligence system](#). The Norwegian Transparency Act requires a due diligence approach in alignment with the OECD

Guidance which consists of six steps. Below we describe Cisco's approach to implementing this guidance for our direct supply chain, indirect supply chain, and internal operations.

OECD Guidance Step 1: Embed responsible business conduct in our policies.

Cisco's policies and approach to protecting human rights in our internal operations and supply chains are based on international labor and human rights standards, as well as best practices across the global business community. These policies apply to the whole Cisco group; all local subsidiaries, including Cisco Norway, are expected to adhere to them. These policies establish our baseline expectations, communicate our values, and promote trust and collaboration as a key underpinning of our many business and stakeholder relationships. Cisco's specific policies include:

- [Global Human Rights Policy](#): Our commitment to upholding and respecting human rights is stated in our Global Human Rights Policy. Our approach is governed by international human rights frameworks, including the Universal Declaration of Human Rights (UDHR), International Covenant on Civil and Political Rights (ICCPR), International Covenant on Economic, Social and Cultural Rights (ICESCR), the eight core International Labour Organization (ILO) Conventions, and is aligned to the UNGPs. A dedicated Business and Human Rights (BHR) team is responsible for the implementation of this policy, which we review on a regular basis.
- [Code of Business Conduct \(COBC\)](#): Our COBC is a crucial part of our company culture that provides employees with a clear understanding of our core values and the high standards for ethical conduct by which we conduct our business, including respect for human rights.
- [Supplier Code of Conduct](#): Cisco has adopted the Responsible Business Alliance (RBA) Code of Conduct as its own Supplier Code of Conduct (the "Code"). The Code sets consistent standards to drive social and environmental responsibility across our global supply chain and communicates our expectations of suppliers for labor, health and safety, environment, ethics, and management systems. These standards set a baseline from which to catalyze broad systems change. Cisco suppliers are required to acknowledge the Code as part of doing business with Cisco. We hold our suppliers—and their suppliers—accountable to the Code. Furthermore, it is a foundational element of our Supplier Ethics Policy.
- [Respecting the Rights of Vulnerable Groups Policy](#): This policy sets forth principles for protecting the most vulnerable individuals in our supply chain and guiding our suppliers and partners to do the same. The policy includes specific expectations for prohibiting all forms of forced labor and respecting the rights of vulnerable groups and those most vulnerable to forced labor risks.
- [Supplier Ethics Policy](#): Our Supplier Ethics Policy requires Cisco suppliers and their employees to conduct themselves with the highest standards of honesty, fairness, and personal integrity. Suppliers must ensure that their employees, subcontractors, agents, and third parties assigned to provide services or products to Cisco act consistently with this policy.
- [Juvenile Labor Policy and Expectations](#): Our Juvenile Labor Policy and Expectations require suppliers to uphold the human rights of children, juvenile or young workers, students, interns, and apprentices. Cisco commits to uphold the eight ILO Core Conventions, including Convention 182 on the Worst Forms of Child Labour (1999) and Convention 138 on Minimum Age (1973). Pursuant to the policy, Cisco suppliers must have procedures that facilitate the immediate remediation and protection of the well-being of children, in case they are found working onsite. Cisco's priority is to ensure that any solution must improve the child's situation and that the child is not made more vulnerable to abuse.
- [Responsible Minerals Policy](#): Cisco's Responsible Mineral Policy aligns with our long-standing commitment to uphold and respect human rights for all people, including those who work in our

supply chain. Our goal is to work collaboratively through the supply chain to source minerals consistent with our values around human rights. Pursuant to this policy, Cisco commits to conduct due diligence to identify and mitigate risks in our supply chain for relevant minerals following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs), including all risks identified in Annex II of the OECD guidance which include forced labor and the worst forms of child labor. Cisco requires our suppliers to maintain policies and programs to do the same.

Cisco communicates relevant supply chain policies to suppliers and requires acknowledgment of those policies, either at onboarding or during annual evaluations. Cisco's policies are also embedded in our standard master purchasing agreements with [direct suppliers](#) and [indirect suppliers](#).

OECD Guidance Step 2: Identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed to, or that are directly linked with the enterprises' operations, products or services via the supply chain or business partners.

Direct supply chain risk assessments: Cisco conducts social and environmental risk [assessments](#) of existing supplier sites. These risk assessments incorporate geographic risk indicators from reputable sources (such as the UN Human Development Index and World Bank Governance Indicators), indicators for forced labor, risks from supplier operations and production, and the supplier's relationship to Cisco. We also incorporate suppliers' previous audit performance and repeated nonconformances in our overall methodology.

The results of these assessments inform the supplier sites at which Cisco will conduct deeper investigations through onsite audits or surveys. If suppliers are found to be nonconformant to our policies, we will engage them to correct issues through [Corrective Action Plans](#).

In addition to our annual risk assessment of sites, we assess new suppliers or new supplier sites, including those from acquisitions. If risks are identified, we follow up to determine if these need to be addressed prior to scaling business with the supplier.

Indirect supply chain risk assessments: During FY2023, Cisco conducted a risk assessment on our global preferred suppliers within indirect procurement. The global preferred suppliers were prioritized based on their strategic relationships to Cisco and included more than 80 percent of Cisco's indirect spend. The process assessed specific spend categories against the potential for human rights impacts and risks to worker wellbeing.

To identify high-risk suppliers, Cisco leveraged existing risk management data, including data obtained during the supplier onboarding process, open ethics cases, denied parties list, and geographic supply chain risk considerations. The result of the risk assessment was a total of 15 suppliers in six countries that required further investigation. To understand the potential risks at these supplier sites, Cisco leveraged the RBA Indirect Spend Self-Assessment Questionnaire (SAQ). This questionnaire, which Cisco was involved in developing, was created to help companies better understand the unique risks posed by indirect suppliers. The RBA provides a risk rating for submitted SAQs to help companies determine appropriate actions to address identified risks.

Indirect SAQs submitted to date have not been deemed “high risk.” Cisco continues conducting due diligence to better understand risks facing our indirect supply chain and prepare those suppliers to mitigate risks in their own operations. When risks are identified, appropriate steps will be taken to address actual and potential impacts.

Operational risk assessments: Cisco conducts [human rights due diligence](#) and human rights impact assessments in an effort to identify, prevent, and mitigate human rights risks. Examples of circumstances that could trigger human rights due diligence include:

- Launch of a new product, offer, or service or a material modification of an existing product, offer, or service.
- Internal review of policies and procedures that may impact human rights, such as updates to our Global Human Rights Policy, Data Protection & Privacy Policy, Cisco Secure Development Lifecycle, or our procedures for responding to law enforcement demands for customer data.
- Entry into or exit from a market.
- Review of a partner's, supplier's, or other third party's policies and procedures.
- Export of regulated products.
- Acquisition of a new company.

OECD Guidance Step 3: Implement suitable measures to cease, prevent, or mitigate adverse impacts based on the enterprise’s prioritization and assessments in Step 2.

Supply chain: Cisco uses multiple strategies in an effort to prevent, cease, or mitigate supply chain risks. These are the main levers that Cisco employs when dealing with human rights or environmental nonconformances:

- **Supplier capability-building:** We aim to promote best practices and give suppliers and site management a baseline set of skills to address social and environmental risks. For example, in FY2023, we delivered trainings on forced labor risks, health and safety, industrial hygiene, worker engagement, water conservation, greenhouse gas (GHG) reporting and clean energy procurement, among others.
- **Supplier accountability:** If a supplier is found to be nonconformant with our policies, we pursue Corrective Action Plans and monitor them to closure. Supply chain management is routinely informed of suppliers' performance on these plans and holds suppliers accountable to make progress. When we lack leverage to drive resolution, Cisco collaborates with industry peers to foster collective action. If a supplier fails to make efforts to improve, we may stop awarding new business, and, when warranted, terminate the relationship.
- **Supplier scorecards:** We use supplier scorecards to help measure and manage suppliers' conformance to Cisco's environmental and human rights requirements. Scorecards inform sourcing decisions and are discussed with suppliers during business reviews. Scorecards also factor into Cisco's supply chain business processes for sourcing and procurement decisions. Having ESG metrics reported alongside cost, quality, and service delivery allows procurement managers to make informed decisions when awarding business to suppliers. The ESG portion of the scorecard includes:
 - Conflict minerals reporting and sourcing of minerals in conformance with our policy
 - RBA audit performance and timely closure of Corrective Action Plans
 - Protection of vulnerable workers, such as foreign migrant workers and young workers
 - GHG reporting and absolute reduction goals

- Water and waste reporting
- Pollution prevention activities and Environment Health and Safety certifications
- **Industry collaboration:** Cisco believes cross-industry collaboration is key to communicating clear and consistent standards to suppliers. Cisco is an active participant in the RBA, of which it is a founding member, the Responsible Labor Initiative (RLI), the Clean Electronics Production Network (CEPN), the Responsible Minerals Initiative (RMI), the Public-Private Alliance for Responsible Minerals Trade, and the European Partnership for Responsible Minerals (EPRM). Cisco also partners with the Institute of Public & Environmental Affairs (IPE), CDP (formerly Carbon Disclosure Project), Alliance for Water Stewardship (AWS) and the Asia Clean Energy Coalition (ACEC). Learn more about [the stakeholders we engage with to drive impact](#).
- **Rightsholder engagement:** Cisco works to promote the [voices of workers](#) in our suppliers' factories and people in surrounding communities. This includes programs to promote worker-management collaboration and communication in supplier factories. We also engage with communities surrounding our supplier sites on environmental issues and work to benefit mining communities through multistakeholder partnerships.

Internal operations: Cisco is committed to respecting human rights throughout our global operations. Cisco conducts human rights due diligence and human rights impact assessments to identify, prevent, mitigate, and work to address human rights risks. To inform our assessment of potential human rights risks, we continually evolve our approach to incorporate emerging best practices and share our human rights practices with the broader business and human rights community. We regularly engage with external stakeholders and potentially affected groups or their legitimate representatives. The BHR team also regularly reports to Cisco's Executive Leadership Team and the Cisco Board of Directors on its progress to mitigate potential human rights harms, and respect ethical principles in our technology solutions and day-to-day operations.

The Cisco Code of Business Conduct (COBC) reflects Cisco's values and is a resource to help customers, partners, and stakeholders around the world make business decisions and resolve issues they may encounter. Cisco requires all employees, on an annual basis, to review, understand, certify, and comply with the COBC when notified. Our COBC states that employees have a responsibility to share their concerns when they see or suspect something that could harm another employee or the company. They are encouraged to do so by talking to their manager, a People & Communities representative, Legal, or the Ethics Office.

The Ethics office can be reached via email, webform, phone, regular mail or via [EthicsLine](#). The EthicsLine is available 24 hours a day, seven days a week. Issues are documented by a highly trained interview specialist and disseminated to appropriate Cisco management who will promptly address the matter. Interpreters are available to assist with the interview if deemed necessary by the caller. Callers have the option to remain anonymous when reporting concerns, although some countries do not allow such concerns to be reported anonymously. Cisco does not tolerate retaliation against an employee for a question or report of misconduct made honestly and in good faith. Retaliating against an individual who asks a question or reports a COBC violation is in itself a COBC violation.

OECD Guidance Step 4: Track the implementation and results of our measures to cease, prevent, and mitigate impacts.

Cisco uses multiple key performance indicators to track implementation and effectiveness of our due diligence efforts. Our approach to creating and tracking key performance indicators focuses on risk identification (such as through audits, surveys, or reports that assess supplier conformance to our policies), supplier performance (whether suppliers address risks and Cisco's requirements), and change (metrics showing Cisco's impact). For example, Cisco tracks and reports the number of [audits performed](#) as well as key nonconformances identified by country. In addition, we track suppliers' performance on audits to determine who demonstrates strong conformance and who requires corrective actions. When corrective actions are needed, we monitor closure according to RBA's closure timelines. We leverage this approach across our programming to assess the effectiveness of our actions and drive improvement of our programs and supplier performance.

In addition to tracking performance at the supplier level, Cisco analyzes data to inform ongoing strategic and programmatic decisions, such as capability building, engagement with stakeholders, and program strategies. This creates a positive feedback loop whereby we can continue to improve our initiatives.

OECD Guidance Step 5: Communicate with affected stakeholders and rightsholders regarding how adverse impacts are addressed.

As a public company operating in multiple jurisdictions, Cisco discloses our efforts in the supply chains space pursuant to applicable regulatory requirements. We publicly report our efforts on our [ESG Reporting Hub](#).

OECD Guidance Step 6: Provide for or co-operate in remediation and compensation where this is required.

Where we have identified that we have contributed to an adverse human rights impact, we aim to provide access to remediation for affected individuals through legitimate processes. For example, upon discovery of the practice of charging prohibited recruitment fees, we work with the supplier to investigate further and stop this practice. We identify fees workers may have paid to labor agents, pre-departure and upon arrival, accounting for recurring fees deducted from their paychecks, and pushing suppliers to engage in dialogue with workers regarding fees that may have been paid to other intermediaries or for travel. We drive suppliers to absorb recruitment fees previously passed onto workers and remediate and facilitate reimbursement of affected workers, irrespective of whether the charging of such fees is legal in the relevant jurisdiction. During FY2023, we drove more than US\$2.2 million in fee reimbursements to 1,865 workers for recruitment fees occurring in these five countries: India, Taiwan, Malaysia, China, and Japan.

As part of corrective actions, Cisco also requires suppliers to adopt comprehensive "no fees" policies and procedures to prevent future workers from paying fees during the recruitment process. In addition to exercising leverage directly with our suppliers, we also collaborate with industry peers through the RBA, RLI and the RMI to drive remediation across the industry, as appropriate.

We are committed to transparently communicating about our corporate human rights policies and approach to due diligence in the supply chain. For further information on Cisco's work to maintain a socially responsible supply chain, refer to our [ESG Reporting Hub](#).

Approval and Signing

This disclosure is signed for and on behalf of Cisco Systems Norway AS

CISCO SYSTEMS NORWAY AS

By: Trine Strømsnes

Name: Trine Strømsnes

Title: Chairperson of the Board of Directors and Managing Director

Date: June 21, 2024

By: Jonas Edeback

Name: Jonas Edeback

Title: Director

Date: June 21, 2024

By: Sajaid Rashid

Name: Sajaid Rashid

Title: Director

Date: June 21, 2024

By: Annick De Waele

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Title: Director

Date: June 21, 2024

By: Cecilie Bjelbøle

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Title: Director

Date: June 21, 2024

By: Arne Bjordal

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Title: Director

Date: June 21, 2024

By: Ann Katrine Kolstad

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