

Cisco Norwegian Transparency Act Joint Statement

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 joint statement is designed to meet Cisco's reporting obligations under the Norwegian Transparency Act. This statement applies to Cisco Systems Norway AS and Working Group Two AS (collectively, "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 2024 (FY2024) starting on July 30, 2023, and ending on July 27, 2024.

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.

Cisco designs and sells a broad range of technologies that help to power, secure, and draw insights from the Internet. We are integrating artificial intelligence (AI) into our product portfolios across networking, security, collaboration and observability to simplify how our technology is delivered, managed and optimized and to help customers maximize the business value of their technology investments and accelerate their digital transformation. We had approximately 90,400 full-time employees as of July 27, 2024; 508 of these were full-time employees of Cisco Systems Norway AS (Working Group Two had zero employees as of this date). Cisco Systems Norway AS provides sales support and marketing services. Working Group Two AS sells services offered through its mobile software-as-a-service platform and provides engineering support services. 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 large group of suppliers, often contracted directly by Cisco to provide parts to our contract manufacturing partners according to our specifications; and
- **Logistics service providers:** a group of providers that transport and store our 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 International Labour Organization (ILO) core labor standards, 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](#): Our Supplier Code of Conduct is a cornerstone of our commitment to the OECD Guidance and the UNGPs. As a founding member of the Responsible Business Alliance (RBA), Cisco contributed to the development of the RBA Code of Conduct and adopted the RBA Code of Conduct as our own Supplier Code of Conduct. The RBA sets consistent standards to drive social and environmental responsibility across global supply chains and is comprised of electronics, retail, auto, and toy companies. These standards enable participating companies to drive broad systems change. We hold our suppliers—and their suppliers—accountable to the Supplier Code of Conduct and other responsible sourcing policies.
- [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.
- [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. Our policy and due diligence are informed by international standards such as the ILO-IOE Child Labor Guidance for Business. 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 help ensure that any solution must improve the child's situation and that the child is not made more vulnerable to abuse. Cisco further commits to uphold the eight ILO Core Conventions, including Conventions 132 and 182 on the Worst Forms of Child Labour (1999) and Convention 138 on Minimum Age (1973).
- [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, where applicable, also embedded in our standard master purchasing agreements.

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 annually 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 UNICEF's Children's Rights in the Workplace Index), 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 investigation through onsite audits or surveys. If suppliers are found to be nonconformant to our policies, we engage them to correct issues through [Corrective Action Plans](#). Cisco also analyzes the nonconformances from audits and other assessments and uses this analysis to inform the development of training programs to help suppliers prevent or mitigate the most likely or frequent risks.

In addition to our annual risk assessment of sites, we assess new suppliers or new supplier sites. Suppliers are required to complete a questionnaire during the onboarding process, which helps us to identify potential social and environmental risks. If risks are identified, we follow up to determine if these need to be addressed prior to launching or scaling business with the supplier.

Examples of the types of risk that the questionnaire can identify include:

- Foreign migrant workers paying recruitment fees
- Student workers employed in positions not related to their field of study
- Critical Supplier Code of Conduct nonconformances in the suppliers' most recent RBA audit that remain open
- Existing pollution violations.

As we aim to source responsibly, we also aim to acquire responsibly. Instead of conducting risk assessments after companies have been acquired, these risk assessments are initiated as soon as a target company is announced. Leveraging a similar risk-vetting process as with new suppliers, we assess if the target company has policies and procedures aligned to our values to safeguard the environment and uphold human rights within their operations and supply chains.

Indirect supply chain risk assessments: We have taken steps to expand the application of our [Supplier Code of Conduct](#) to our indirect supply chain. Since Fiscal Year 2020, we have required indirect suppliers to abide by the Supplier Code of Conduct.

During FY2024, 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 the majority 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 risk assessment resulted in 22 suppliers in 12 countries that required further investigation. To understand the potential risks at these supplier sites, Cisco leveraged the RBA Indirect Spend 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 indicated these suppliers are not deemed "high risk." Cisco continues to conduct due diligence to better understand risks facing our indirect supply chain and prepare those suppliers to mitigate risks in their own operations. As we continue, we compile learning and best practices with the aim to continuously improve the due diligence process. When risks are identified, appropriate steps will be taken to address actual and potential impacts.

Cisco continues to participate in the [RBA Working Group on Indirect Supply Chains](#). This group focuses on understanding key human rights, environmental, and ethical risks associated with indirect spend suppliers and developing special tools to assess, remedy, and prevent future risks. Collaborating with industry peers and the RBA has allowed us to adapt tools and processes to the indirect procurement space while collectively learning and addressing unique challenges related to service procurement.

Operational risk assessments: Cisco conducts [human rights due diligence](#) and human rights impact assessments to identify, prevent, mitigate, and work to address 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.
- Merger with or 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 FY2024, we delivered trainings on forced labor risks, health and safety, chemical management, worker engagement, mandatory Human Rights Due Diligence, water conservation, greenhouse gas (GHG) reporting, clean energy procurement, and updates to the RBA Code of Conduct, among others.
- **Supplier accountability:** If a supplier is found to be nonconformant with our policies, we work with suppliers to develop, implement, and monitor Corrective Action Plans as a requirement to do business with us. 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 necessary, terminate the relationship. We use supplier scorecards to help measure and manage suppliers' conformance to Cisco's responsible business practices, including environmental and human rights requirements. Scorecards are discussed with suppliers during business reviews. Scorecards also factor into Cisco's supply chain business processes for sourcing and procurement decisions. Having responsible business metrics reported alongside cost, quality, and service delivery allows procurement managers to make informed decisions when awarding business to suppliers. The responsible business portion of the scorecard includes information on:
 - Conflict minerals reporting and sourcing of minerals in conformance with our policy
 - RBA audit performance and timeliness of 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 concerns.
- **Industry collaboration:** Cisco believes cross-industry collaboration is key to communicating clear and consistent standards to suppliers. In presenting a united front, our industry can work collectively to help suppliers make important improvements. Cisco is an active participant in the RBA, of which it is a founding member, the Responsible Minerals Initiative

(RMI), the Responsible Labor Initiative (RLI), the Clean Electronics Production Network (CEPN), the Public-Private Alliance for Responsible Minerals Trade (PPA), 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 for worker-management collaboration and communication in supplier factories. We also engage with communities surrounding our supplier sites on environmental issues and work to support 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 regularly engage with external stakeholders and potentially affected groups or their legitimate representatives. The BHR team also regularly reports to members of Cisco's Executive Leadership Team on its progress to mitigate potential human rights harms and respect ethical principles in our technology solutions and day-to-day operations.

Our 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. 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 reporting to their manager, a People & Communities representative, Legal, or the Ethics Office.

There are multiple ways to contact the Ethics Office. Cisco EthicsLine, a confidential reporting tool, allows users to report online or by telephone. Reports can be made at any time—24 hours a day, seven days a week, and in 27 languages. Reporters have the option to remain anonymous when reporting concerns if allowed by local law. Cisco's EthicsLine is available to Cisco employees, customers, partners, vendors, and others involved with Cisco's business. In addition to EthicsLine, reports can be made to the Ethics Office by email to ethics@cisco.com. Concerns specific to privacy or human rights can be made by contacting privacy@cisco.com or humanrights@cisco.com, respectively.

Cisco encourages anyone to raise concerns if they become aware of possibly unlawful or unethical conduct or suspect there has been a violation of Cisco's Code of Business Conduct or company policies. Cisco supports those who raise genuine concerns, even if they turn out to be mistaken. Cisco strictly prohibits any retaliation or threats of retaliation.

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 a number of due diligence [program metrics](#) including 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 them to closure according to the RBA closure timeline. 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.

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

We publicly report our efforts in our Purpose Report, Global Statement on the Prevention of Modern Slavery and Human Trafficking, Conflict Minerals Report, and CDP climate change and water questionnaires, among others.

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 remedy for affected individuals through legitimate processes. For example, when bonded labor issues are identified we take steps to address them which may include the following:

1. Institute the Employer Pays Principle. This entails having suppliers develop policies and procedures to stop forced labor risks and stop the fees being charged to workers.
2. Conduct an RBA-approved third-party fees investigation.
3. Work with the supplier employer to reimburse. A direct outcome of the investigation is to calculate the total reimbursement to affected workers, develop a plan to reimburse, and determine the actual cost of recruitment moving forward. Cisco helps suppliers develop and implement the reimbursement plan in a timely manner and works to monitor the plan until all workers have been repaid

During FY 2024, we pursued corrective actions for nonconformances identified in China, India, Malaysia, Singapore, Taiwan and Thailand, including driving more than US\$1.7 million in fee reimbursements to 2,290 workers across our direct and sub-tier suppliers for recruitment fees occurring in Malaysia, Singapore and Taiwan. Meanwhile, 100% of forced labor Priority Nonconformances are closed or in progress of being remediated. An overview of the number of RBA nonconformances found related to forced labor can be seen in our published audit data, including geographic distribution.

In addition to exercising leverage directly with our suppliers, we also collaborate with industry peers through the RBA and its RLI and the RMI, which are multi-industry, multi-stakeholder initiatives promoting the rights of vulnerable workers in global supply chains. Our participation in

these industry initiatives helps drive consistent expectations for due diligence and 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.

Approval and Signing

This joint statement is signed for and on behalf of Cisco Systems Norway AS, Cisco Wood Norway Holdings AS, Working Group Two AS, Cisco Norway Holdings AS

Date: 25 June 2025

CISCO SYSTEMS NORWAY AS

By: Trine Stroemsnes
Name: Trine Stroemsnes
Title: Chairman and Managing Director

By: Stian Johansen
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Title: Member of the Board

By: Annick de Waele
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