

MODERN SLAVERY STATEMENT 2020

Juniper Networks, Inc. and its subsidiaries (Juniper Networks) have developed this statement to comply with the California Transparency in Supply Chain Act of 2012 (SB657), the United Kingdom Modern Slavery Act of 2015, the Australian Modern Slavery Act 2018, and the Federal Acquisition Regulation (FAR)/Defense Federal Acquisition Regulation Supplement (DFARS) under FAR 52.222-50 and DFARS 252.222-7007. This statement outlines our commitment and approach to promoting a workplace and supply chain free from modern slavery and human trafficking, and one where workers are treated with respect and dignity.

Background

Juniper Networks designs, develops, and sells products and services for high-performance networks to enable customers to build scalable, reliable, secure, and cost-effective networks for their businesses while achieving agility and improved operating efficiency through automation.

Juniper Networks sourcing and manufacturing activities are outsourced to a worldwide network, the key elements of which are comprised of: contract manufacturers (CM), original design manufacturers (ODM), component suppliers, warehousing and logistic firms, and recruiting firms. Our outsourced model provides a tremendous opportunity and responsibility to encourage the adoption of responsible business practices.

Juniper Networks is committed to a collaborative approach in applying leading standards and practices in the electronics industry supply chain in order to drive performance and compliance with critical corporate social responsibility policies. To this end, Juniper Networks is a member of the [Responsible Business Alliance \(RBA\)](#) and has supported the development of industry tools and programs that provide a common means to assess risk at the corporate, facility, and supplier levels and manage and share sustainability data. Additionally, Juniper has adopted the [RBA Code of Conduct](#), which prohibits the use of forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, slavery, or trafficking of persons.

Policies

Juniper Networks is dedicated to honoring human rights, including the eradication of human trafficking, modern slavery, and forced and child labor. Juniper Networks believes that ethical business practices

and compliance with laws are essential, and we expect our employees and our global supply chain network to adhere to the same high ethical standards.

Juniper Networks' policies are informed by the [RBA Code of Conduct](#) and the [Ten Principles of the United Nations Global Compact](#). Our policies, codified in our Worldwide Code of Business Conduct and our Business Partner Code of Conduct, articulate a shared vision and set of expectations for Juniper Networks employees and business partners.

- **Worldwide Code of Business Conduct:** Our Worldwide Code of Business Conduct applies to all employees who represent Juniper, regardless of location, and is an extension of Juniper's core values and principles—the Juniper Way. It establishes acceptable interactions in the workplace, including expectations on human rights.
- **Business Partner Code of Conduct:** Our Business Partner Code of Conduct applies to all business partners, including direct and indirect suppliers, vendors, and contractors. It is aligned with the RBA Code of Conduct and communicates to our suppliers Juniper Networks' expectations on implementation of a management system approach for upholding human rights, including eradication of forced, bonded, or indentured labor, involuntary prison labor, slavery, and trafficking of persons.

The Corporate Social Responsibility function, which resides within the Juniper Networks Legal Department, is responsible for driving social and environmental standards across the organization and supply chain, including those related to forced labor. The team works across functions—including Supply Chain Operations, Human Resources, and Integrity and Compliance—to establish and coordinate the policies, processes, and programs governing Juniper's approach to human rights and ethical conduct.

Actions

Juniper Networks has implemented policies and procedures to prevent prohibited activities and to monitor, detect, and take appropriate corrective action if any prohibited activities are identified, up to and including termination. Juniper Networks follows an internationally recognized compliance program framework for human trafficking and modern slavery: verification, audit, certification, accountability, and training.

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- **Verification:** Annually, we evaluate and identify risks of human trafficking and slavery through monitoring of our corporate operations' and direct material suppliers' and manufacturing partners' compliance to the RBA Code of Conduct. Suppliers who meet the following criteria are included in the risk assessment process:

- Suppliers who are in the top 80% of direct material spend in the relevant calendar year (based in part on forecasted spend),
- All CMs and ODMs, and
- All direct material suppliers who provide what are identified as the most critical technologies and can have a broad impact across Juniper.

Juniper Networks utilizes the RBA assessment process and tools, or equivalent, to help us measure and better understand the level of compliance to the RBA code and which gaps remain for further review and action. In 2019, Juniper assessed compliance and labor risks at 105 supplier facilities, a 33% increase in the number of assessed supplier facilities compared to 2018.

- **Audit:** Using the outputs from the RBA assessment process and tools, as described above, we apply a risk-based approach to determine at which supplier facilities to conduct onsite audits. Juniper Networks employs an independent third party to conduct announced audits of those supplier facilities that present a potential high risk of non-compliance to the corporate social responsibility standards set forth in the RBA Code of Conduct, including risks to human rights. The independent, third-party auditors are specially trained in social and environmental auditing and utilize a standardized RBA Validated Audit Process (VAP) protocol. When available, Juniper Networks also reviews supplier audit reports through RBA's audit sharing system. Findings identified during the audit process are communicated to the suppliers for corrective action, tracked to closure, and reviewed during supplier business reviews, where applicable. Priority focus is placed on the following issues if identified: child labor, forced labor, bonded labor, and inhumane treatment.
- **Certification:** Our employees, as well as authorized representatives of our business partners, where required, certify that they have read, understood, and are committed to complying with the principles of the Worldwide Code of Business Conduct and the Business Partner Code of Conduct, respectively. Juniper Networks terms and conditions require suppliers to comply with legal requirements in all their activities. As Juniper Networks refreshes supplier master purchase and service agreements, the Business Partner Code of Conduct is integrated into contracts and, thus, further emphasizing expectations of ethical behavior.
- **Accountability:**
Employees. All Juniper employees are responsible for adhering to the Worldwide Code of Business Conduct and applicable laws and regulations, no matter where they are in the world.

Juniper Networks insists on employees exercising the highest standards of business conduct and ethics in all of our dealings inside and outside of the company. Managers not only set the tone for an ethical culture, but also are expected to act as mentors and coaches and guide their employees on how to conduct business honestly and in compliance with the law and company policies. Managers are responsible for their team's compliance with the law, the Worldwide Code of Business Conduct, and company policies.

The Audit Committee of our Board of Directors is responsible for the overall oversight of our Integrity and Compliance Program. Our Chief Compliance Officer has overall responsibility for the direction and execution of the corporate ethics and compliance program, including the effective internal and external communications of corporate values, ethics, business conduct standards, policies, and compliance programs through vehicles such as the Worldwide Code of Business Conduct and Business Partner Code of Conduct.

Suppliers. Juniper Networks' supplier agreements require suppliers to comply with all applicable laws and regulations and, when entering into or renewing supplier master agreements, we include our Business Partner Code of Conduct. These expectations are communicated to our suppliers upfront through the supplier onboarding process and throughout our engagement during business reviews. Juniper seeks to strengthen our relationship with our suppliers by providing training and through our Business Partner Code of Conduct. If suppliers do not follow Juniper's policies or meet Juniper's performance expectations, we may escalate the matter, among other compliance and quality matters, in the supplier business review process and take the non-compliance into account in supplier performance scorecards. Supplier non-compliance and poor performance on scorecards may result in a determination to suspend, disengage, or take other corrective actions with respect to the supplier.

We have taken steps to strengthen our supplier accountability over time. For example, in 2018, Juniper implemented program improvements to mitigate risk, including (1) implementation of corporate social responsibility criteria in the direct supplier onboarding process to identify potential labor, environmental, health and safety, and ethics risks, including those associated with forced labor, and (2) strengthening the supplier scorecard by adding new metrics to assess a supplier's compliance with the RBA requirements. These enhancements were implemented to provide more transparency in our expectations and evaluations, promote more granular responsible sourcing discussions with our suppliers, and drive initiatives that will support Juniper's responsible sourcing goals. Further, in 2019, Juniper implemented the new scorecard metrics across all manufacturing partners and direct material commodities, which enables Juniper to better evaluate the maturity of suppliers compared to their peer group as well as across commodity categories. This data visibility allows Juniper to prioritize supplier and commodity manager engagement.

- **Training:** All of our employees are provided with the Worldwide Code of Business Conduct upon hire and undergo initial and continual training on the contents of the Code. Employees with direct responsibility for the human trafficking compliance program complete tailored trainings, including specifics on the governing legal requirements and human rights risks in the supply chain. Additionally, employees engaged with the U.S. Federal Government complete a course focused on the specific requirements associated with government contracts, including those under FAR 52.222-50 on human trafficking and forced labor. Additionally, through our RBA membership, we support the development of workshops, trainings, and reports focused on ensuring understanding of the RBA policies, best practices, and the true extent and trends of trafficked and forced labor in the electronics industry. These resources are made available to our suppliers.

Violation Monitoring, Reporting, and Remediation

All Juniper Networks employees, suppliers, business partners, contractors, subcontractors, agents, and customers are encouraged to report any events of questionable, fraudulent, or illegal nature that are, or may be, in violation of the Worldwide Code of Business Conduct, Business Partner Code of Conduct, or legal requirements, including any events of forced labor, using one of the following methods:

- E-mail integrity@juniper.net
- Call the toll-free Juniper Integrity Hotline at +1-855-410-5445 or submit a report online at integrity.juniper.net
- Contact Juniper's Chief Compliance Officer

Information can be submitted anonymously and without retaliation, and will be kept confidential to the fullest extent practicable and allowed by law.

Based upon the steps taken and to the best of Juniper Networks' knowledge and belief, neither Juniper Networks nor any of its agents, subcontractors, or their agents has engaged in any trafficking or forced or child labor. In the event that abuses relating to any of the prohibited activities identified in the FAR 52.222-50, SB657, the UK Modern Slavery Act, or the Australian Modern Slavery Act are found, Juniper Networks will implement the appropriate remedial actions within local country laws, up to and including termination of employees, agents, and contractors and termination of contracts.

We are committed to providing transparency in all aspects of our business. For further information on the activities undertaken to promote responsible practices in our operations and our supply chain, refer to Juniper's Corporate Citizenship and Sustainability Report.

The Board of Directors of Juniper Networks, Inc. has approved this statement.



Rami Rahim, Chief Executive Officer