Micro Focus - Anti-Slavery Statement

Introduction

Micro Focus (LSE: MCRO.L; NYSE: MFGP) is a leading global infrastructure software company. We make, sell and support software that enables customers to build, operate, secure, and analyse their enterprises. Our focus is on customer centric innovation that enables customers to bridge existing and emerging technologies, protecting investments and supporting their digital transformation journey. Our solutions span four key areas - Enterprise DevOps; Hybrid IT Management; Security, Risk, and Governance; and Predictive Analytics. For more information visit www.microfocus.com. Micro Focus is headquartered in Newbury in the United Kingdom and has approximately 14,000 employees in over 40 countries around the world.

Our Business and Supply Chain

As an office-based software company with a professional workforce, Micro Focus does not consider its own employees to be at high-risk from a slavery, forced labour or human trafficking point of view. Micro Focus also does not have an extensive range of local or international suppliers. Our supply chain broadly consists of goods and services provided by third parties in relation to our offices, such as stationery suppliers, caterers, office cleaners and suppliers of marketing merchandise.

We are nonetheless committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery, forced labour and human trafficking does not take place anywhere in our business or supply chains.

Due Diligence

We continue to develop our risk-based approach to assess the likelihood of modern slavery occurring in our supply chains. This includes informing our suppliers of Micro Focus' obligations under the Modern Slavery Act 2015 and the ethical standards expected of them. We continue to review our procurement practices and include additional requirements relating to modern slavery and human trafficking. These include requests for information on modern slavery and supply chains in our Requests for Proposals and appropriate clauses on modern slavery in supplier contracts, such as our standard form Purchase Order Terms.

Effectiveness

Following completion of the merger with Hewlett Packard Enterprise's software business on 1 September 2017, we are continuing to review our anti-slavery systems and controls to:

- Further identify, assess and monitor potential risk areas in our now enlarged supply chains; and
- Identify ways to further mitigate the risk of slavery and human trafficking occurring in those enlarged supply chains.

Policies

Micro Focus' worldwide Code of Conduct was updated in August 2018 and outlines our commitment to observing the highest ethical standards that guide our business practices across a number of areas, including in relation to human rights. The Code of Conduct has been communicated to all our staff (including through dedicated training), and includes our Anti-

Slavery and Human Trafficking Policy.

Our Anti-Slavery and Human Trafficking Policy outlines our zero-tolerance approach to slavery and human trafficking and encourages employees to report any concerns immediately.

We are updating our Supplier Code of Conduct, which includes details of our expectations on issues such as slavery, human trafficking, forced labour and child labour, for implementation across the total Micro Focus group.

In addition, we also have both an Anti-Bribery and Corruption Policy and a Whistleblowing Policy. Together these policies aim to ensure that our business is conducted in an ethical and responsible manner and that employees are able to voice any concerns they may have securely and confidentially.

Training

Information on modern slavery is included in our company-wide Code of Conduct and related training. In addition, anti-slavery and human trafficking awareness training is to be provided where needed in order to educate our employees on how to identify and prevent slavery and human trafficking taking place in our supply chains.

Responsibility and Monitoring

The Board of Micro Focus International plc has overall responsibility for ensuring that the Micro Focus worldwide Code of Conduct and this statement comply with our legal and ethical obligations and that all those under Micro Focus' control comply with it. Our Group Compliance Officer has primary and day-to-day responsibility for monitoring the Code of Conduct and this statement's use and effectiveness.

Reporting

If issues are identified in relation to modern slavery, these should be immediately reported to the relevant manager, the Legal Team or by using our confidential independent contact point: <u>https://secure.ethicspoint.eu/domain/media/en/gui/104674/index.html</u>

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act and has been approved by Micro Focus International plc's Board of Directors on 20 March 2019. This statement is published on behalf of Micro Focus International Plc and its qualifying group companies and references to "we", "us", "our" or the "company" are to each of these entities.

Signed:

Kevin Loosemore Executive Chairman Micro Focus International plc