



Zscaler Statements Against Modern Slavery

Introduction

Zscaler is committed to acting ethically and with integrity in all of our business relationships and to promoting a workplace and supply chain that is free from modern slavery and human trafficking ("Modern Slavery") and where workers are treated with respect and dignity. This statement is Zscaler's global statement on Modern Slavery for the purposes of compliance with Section 54 of the Modern Slavery Act 2015 of the United Kingdom and the Modern Slavery Act 2018 of Australia (collectively, the "Modern Slavery Acts"), and constitutes Zscaler's Modern Slavery Statement for the financial year ending July 31, 2023. This joint statement has been approved by the directors of Zscaler (UK) Limited, ZSC Holdings (UK) Limited and Zscaler Australia PTY Ltd. as required per the Modern Slavery Acts.

Our Business

Zscaler's mission is to make the cloud safe for business and enjoyable for users. We deliver integrated and comprehensive solutions to our customers using our cloud platform, the Zscaler Zero Trust Exchange™ Platform.

Zscaler was founded during the early stages of cloud adoption and mobility, based on a vision that the internet would become the new corporate network as the cloud becomes the new data center. We predicted that with rapid cloud adoption and increasing workforce mobility, traditional perimeter security approaches would provide inadequate protection for users and data and an increasingly poor user experience. We pioneered a cloud platform, the Zscaler Zero Trust Exchange, that represents a fundamental shift in the architectural design and approach to networking and security.

The ultimate parent of each of Zscaler (UK) Limited, ZSC Holdings (UK) Limited and Zscaler Australia PTY Ltd. is Zscaler, Inc., a Delaware (U.S.) corporation headquartered in San Jose, California (U.S.). For the purposes of this statement, any reference to "Zscaler" is a reference to each and every company within the Zscaler group of companies, as we uphold the values set out in this statement regardless of geographic location.

Our Values

At Zscaler, we do things right. We believe that how we conduct ourselves is just as important as what we do. We are committed to maintaining the highest standards of business ethics. Zscaler strives to foster a supportive workplace by adhering to the following workplace principles:

- We always act ethically and legally
- We follow our own policies
- We deal fairly with others
- We create a place where people want to work
- We respect others and value differences

- We promote security and respect privacy
- We protect our own IP and respect the IP of others
- We keep sensitive information confidential
- We keep accurate records
- We work with partners and vendors who share our principles.

Our Employees

Wherever we employ people directly, our people compliance and employment law teams work to ensure that our employment practices are in accordance with our Code of Conduct and local labor law. We provide all employees with detailed and accurate work agreements before they start working for the company. Employment with the company is “at will”, and our employees may choose to leave the company at any time, with or without cause or notice.

Our Supply Chain

Our main supplier categories include data center providers, cloud platform systems and integrators, IT and software vendors, manufacturers of networking equipment and providers of professional services. Our global procurement is led by a team in our headquarters in the United States. Our business is global, and we seek out top-tier reputable vendors and suppliers wherever we operate.

Zscaler's goal is to establish a supply chain through partnership with suppliers who treat their employees in a fair and respectful manner. As stated in our Supplier Code of Conduct, we expect our suppliers to have appropriate policies and procedures in place for their employees and their own supply chains. Suppliers must ensure they are not complicit in human rights abuses, including modern slavery and human trafficking.

Modern Slavery consists of crimes that violate fundamental human rights. These crimes take various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Zscaler has zero tolerance for any form of Modern Slavery in our business and we are fully committed to preventing and detecting it. Zscaler is also committed to transparency in our business activities and throughout our supply chain and we expect that all our contractors, partners, resellers, vendors and other suppliers comply with all applicable laws including those in relation to Modern Slavery.

We consider ourselves to be low risk regarding Modern Slavery and human trafficking issues in our supply chain because of the nature of our business, which is providing cloud-based software security and services to our customers. We obtain goods and services from trustworthy third parties, and we believe the nature of the goods and services we obtain does not typically entail labor that is susceptible to Modern Slavery and human trafficking.

Measures to Prevent Modern Slavery

Although we do not consider Modern Slavery to be a high risk for Zscaler, we have in any event implemented several initiatives across our business in support of our zero-tolerance policy against Modern Slavery, including:

Supplier Code of Conduct. The Zscaler Supplier Code of Conduct sets ethical, social, and environmental expectations of suppliers providing goods or services to Zscaler. The Supplier Code of Conduct includes expectations for human rights, including those related to modern slavery and human trafficking.

We expect, and to the fullest extent possible when we enter into negotiated agreements, that our vendors and other suppliers comply with all applicable laws, which includes the Modern Slavery Acts. We will not support a supply chain where we are aware of, or have reasonable grounds to believe, that slavery and human trafficking are taking place.

Zscaler's Supplier Code of Conduct can be found here: <https://www.zscaler.com/legal/supplier-code-of-conduct>

Supplier Code of Conduct Due Diligence. Zscaler is committed to periodically reviewing and assessing the risks in our supply chain, including our contractors, partners, resellers, vendors and other suppliers to ensure that they meet the requirements of Zscaler's Supplier Code of Conduct and comply with relevant laws and regulations. All Suppliers are subject to the risk screening procedure. The risk screening process aims to identify suppliers that may have a higher risk of non-compliance with the Supplier Code of Conduct

Zscaler Code of Conduct. The Zscaler Code of Conduct clearly communicates the behavior expected of employees when conducting business on behalf of Zscaler. Zscaler strives to maintain the highest standards of conduct and ethical behavior in our operations and while managing our supply chain.

Training and Awareness. As noted above, Zscaler maintains a global Code of Conduct that requires ethical behavior in our operations, including the humane treatment of all people. All Zscaler employees are required to review the Code of Conduct, be trained on the expectations of the Code of Conduct and acknowledge that they will adhere to the Code of Conduct while employed at Zscaler.

Reporting Concerns. Zscaler offers multiple reporting channels to our employees, suppliers, supply chain employees, and business partners, including a web portal and telephone hotline that provide individuals with the opportunity to report concerns anonymously and can be accessed at www.zscaler.ethicspoint.com. We routinely promote awareness of these reporting channels through internal policies, communications, and training. We also prohibit retaliation against anyone who, in good faith, reports any matter relating to Modern Slavery or who assists in the investigation of a reported concern.

Next Steps

We recognize and understand the importance of the Modern Slavery Acts and are committed to periodically reviewing and assessing the risks in our supply chain, including our negotiated agreements with our contractors, partners, resellers, vendors, and other suppliers.

Approval

This statement is made pursuant to the Modern Slavery Acts and constitutes our slavery and human trafficking statement for the fiscal year ending July 31, 2024.