

## Modern Slavery and Human Trafficking Statement

Teradata makes this statement in accordance with the provisions of the Modern Slavery Act 2015.

Teradata is committed to acting ethically, with integrity and transparency in our business dealings and relationships. Teradata views slavery and human trafficking as gross abuses of human rights and is committed to implementing and enforcing systems and controls to help ensure they do not occur anywhere in Teradata's own business or in that of our supply chains.

Teradata is proud that each year since 2010, and most recently in 2019, the Ethisphere Institute has designated Teradata one of the "World's Most Ethical Companies". We also have been recognized by listings on Dow-Jones Sustainability Indices and the FTSE-4-Good Index, which include, amongst other things, consideration of listed-companies' ethical, compliant and sustainable employment and supply chain practices.

### **ABOUT TERADATA**

Teradata (UK) Limited is the UK indirect subsidiary of Teradata Corporation. Teradata Corporation is listed on the New York Stock Exchange and is the parent of a worldwide group of companies that provides analytic data platforms, software applications and related consulting, maintenance and support services. Teradata Corporation has its head office in the United States of America. The Teradata group employs, directly and indirectly, over 10,000 employees worldwide. Whilst this statement applies solely to Teradata (UK) Limited, the principles, policies and practices referred to within this statement are applicable to the entire Teradata group of companies.

### **OUR BUSINESS**

Teradata's business delivers better business outcomes through technology-enabled solutions in the areas that matter most to our customers – from operational excellence and asset optimization, to customer experience and product innovation, to finance transformation and risk mitigation. Teradata works with leading businesses in over 70 countries worldwide. Our clients include many of the top performers and best-known brands in telecom, transportation, consumer packaged goods, financial services and manufacturing.

We focus on turning the most complex and challenging data sets into high-value assets that produce high-impact insights and tangible value for the business.

Our specific solutions and services include:

- Business Analytics Solutions: analytics that unleash the breakthrough value hidden in your data
- Ecosystem Architecture Consulting: expertise to design and deliver the right architecture to advance the business

- Hybrid Cloud Solutions: tailored cloud strategies and deployment plans that put analytics everywhere it needs to be

More than 50% of our team are consultants – data strategists and data scientists, technologists, innovators and experts in all types of analytics. We engage directly with business and IT leaders to solve urgent real-world problems and seize compelling strategic opportunities. We combine proven analytics expertise, specialized business consulting, and scalable, high-performance, analytics ecosystems. Teradata's agile analytical ecosystems solutions are market-leading and award-winning.

## **OUR EMPLOYEES**

Teradata is committed to treating all its employee worldwide with respect and dignity. We strive to provide a workplace that is free from violence and discrimination. Employees are required to comply with Teradata's Code of Conduct (see <http://www.teradata.com/about-us/code-of-conduct>). Teradata requires that it, its subsidiaries and its employees (as well as its suppliers and business partners) comply with all applicable country employment and human rights laws, routinely exceeding national minimum wage legislation, where such applies. Where Teradata procures temporary/supplementary personnel via staffing agencies, we require such agencies to adhere to the same principles.

The Teradata Code of Conduct includes provisions requiring compliance with our employment policies, employment laws, labour rights and human rights, including the principles of the UN Global Compact and the Electronic Industry Citizenship Coalition (EICC) Code of Conduct.

Our global policies prohibit harassment, discrimination, workplace violence (including threats of violence), illegal conduct and criminal conduct, promote diversity, inclusion and freedom of association/expression (such as with respect to workers' council and diversity-based business resource groups), and provide an internal dispute resolution mechanism to address employee grievances.

Human rights violations generally also may be fostered and concealed by bribery, corruption and false/inaccurate books-and-records entries. In connection with such, Teradata has a strong zero-tolerance policy regarding bribery, corruption and falsification of books-and-records (see [http://assets.teradata.com/pdf/Teradata\\_Anti-Bribery\\_and\\_Anti\\_Corruption\\_Policy.pdf](http://assets.teradata.com/pdf/Teradata_Anti-Bribery_and_Anti_Corruption_Policy.pdf)). Modern slavery and human trafficking also can be connected with pornography, prostitution and adult-sexually-oriented entertainment. As such, Teradata policies prohibit the use of any Teradata resources in connection with such and prohibit any company-related entertainment, activities and spending in connection with such. To help assure compliance with respect to these areas, Teradata regularly blocks, audits, monitors, analyses and places heightened internal controls with respect to bribery, corruption, books-and-records, pornography and entertainment compliance.

Our global Conflict Minerals Policy also prohibits Teradata, its subsidiaries and its employees (as well as its suppliers) from utilizing conflict minerals sourced from forced labour, child labour, slavery or violence in the region of the Democratic Republic of

the Congo (DRC) in Africa or those who perpetrate or support such human rights abuses. That policy includes the following statements: "Teradata opposes and condemns DRC Conflict Perpetrators, their perpetrating conduct, and the adverse consequences that conduct imposes on the people and environment of the DRC Region. Teradata supports goals, laws and initiatives that effectively (1) respect and protect human rights and the environment, (2) foster supply chain integrity, ethics, compliance, accountability and sustainability, and (3) oppose, condemn, stop, eliminate, reduce, isolate, identify and penalize DRC Conflict Perpetrators." See our Conflict Minerals Policy at [http://assets.teradata.com/pdf/Corporate/Teradata\\_Conflict\\_Minerals\\_Report\\_for\\_2016.pdf](http://assets.teradata.com/pdf/Corporate/Teradata_Conflict_Minerals_Report_for_2016.pdf)

The human rights and labour practices principles of the UN Global Compact are derived from and incorporate principles from the Universal Declaration of Human Rights and the International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work. Teradata's adoption of and commitment to the UN Global Compact, and its annual financial contributions to the UN Global Compact Foundation to support the UN Global Compact's mission, include the following:

regarding Human Rights –

Principle 1 - Businesses should support and respect the protection of internationally proclaimed human rights;

Principle 2 - Make sure that they are not complicit in human rights abuses;

regarding Labour –

Principle 3 - Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4 - the elimination of all forms of forced and compulsory labor;

Principle 5 - the effective abolition of child labor; and

Principle 6 - the elimination of discrimination in respect of employment and occupation.

The principles of the EICC Code of Conduct include commitments regarding:

freely-chosen employment;

child labor avoidance;

limit on working hours;

appropriate and lawful wages and benefits;

non-discrimination;

freedom of association; and

responsible sourcing of minerals.

Teradata also is a signatory to the UN Women's Empowerment Principles (the WEP). The WEP includes, among other things, commitments to: treating all women and men fairly at work – respect and support human rights and non-discrimination; and ensure the health, safety and well-being of all women and men workers.

Anyone, including all Teradata employees, have access to the Teradata Ethics Helpline, allowing Code of Conduct, policy, and other ethics and compliance questions to be raised, and violations or suspected violations of such or the law to be reported, with options to do so on an anonymous and/or confidential basis. As a matter of policy, Teradata will not retaliate against an employee because he/she raised such a concern or in good faith reported an actual or suspected violation of our Code of Conduct, policies, or the law.

In addition to taking preventative and defensive measures to help avoid, reduce and eliminate modern slavery and human trafficking, Teradata and its employees take affirmative actions in many countries across the globe to improve human conditions and reduce or eliminate circumstances that might foster or give rise to oppression, suffering, human rights violations, modern slavery and human trafficking. These include "Teradata Cares" initiatives that focus on education and community support/development, provide employees with paid time-off for volunteering, matching employee gifts to help improve the human condition and the environment, community service grants, scholarships, and company-sponsored "Days of Caring" community support and development events. See our Corporate Social Responsibility Report at Section 6 and <http://www.teradata.co.uk/about-us/community-relations>

As set forth in our Code of Conduct, Teradata's Shared Values include "**Responsibility** – We demonstrate responsibility in all aspects of our business endeavors. We are committed to the communities where we work and live." Our desired "Qualities" include "**Ethics**", "**Respect**" and "**Accountability**". And, our Code of Conduct "Commitments" include that "**we conduct business ethically and in compliance with our Code of Conduct and Policies**", "**we respect others**" and "**we comply with laws**". These values, qualities and commitments, combined with our policies, practices and actions described above, purposely are intended to foster a corporate culture of ethics, compliance and integrity in everything Teradata and Teradata employees do in connection with our business – to do the right things, always – including with respect to avoiding and trying to help eliminate modern slavery and human trafficking.

## OUR SUPPLY CHAINS

Teradata maintains a dedicated procurement and supplier management team. Prior to being registered in our procurement systems, Teradata's suppliers are subjected to due-diligence-screening and risk-assessments, and those who advance are required to meet or exceed the standards of the Teradata Code of Conduct for Suppliers and/or the Teradata Code of Conduct for Business Partners. These supplier and business partner codes incorporate : (1) the Teradata Code of Conduct; (2) the principles of the UN Global Compact; (3) the principles of the EICC Code of Conduct; (4) the Teradata Conflict Minerals Policy; (5) laws and Teradata policies regarding anti-bribery, anti-corruption and trade compliance (e.g., the Teradata Anti-Bribery and Anti-Corruption Policy); and (6) laws and Teradata policies regarding privacy and data protection (e.g., the Teradata Privacy Policy). Teradata maintains where possible a contractual right to audit the activities of its suppliers and business partners so that these matters may be effectively monitored.

Teradata has assessed that, in the context of its industry, business and operations, the potentially most likely, most significant, most-Teradata-influenced and highest-risk channel for modern slavery and human trafficking would be in its supply chain for Teradata-branded computer hardware products. All Teradata-branded production hardware is sourced solely from one contract-manufacturer (also commonly referred to as an electronics-manufacturing-services (EMS) supplier), FLEX LTD (formerly Flextronics). FLEX is a founding and active member of the EICC, maintains its own anti-trafficking/ant-slavery initiatives and publishes its own slavery and human trafficking

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[https://flex.com/sites/default/files/component\\_b2/Slavery%20and%20Human%20Trafficking%20Statement%202016.pdf](https://flex.com/sites/default/files/component_b2/Slavery%20and%20Human%20Trafficking%20Statement%202016.pdf)

. Therein, and in FLEX's Corporate Social Responsibility Report (see <https://flex.com/sites/default/files/sustainable-living-2017-global-citizenship-executive-final-report-flex.pdf>), FLEX describes the measures it takes to help assure that its upstream suppliers comply with FLEX and EICC Code of Conduct requirements pertaining to human rights, slavery and human trafficking.

Teradata's agreements with FLEX require compliance with laws, labour standards and conflict minerals requirements, and Teradata regularly communicates with FLEX regarding, and monitors FLEX's compliance with, FLEX's agreements and obligations with respect to the supply chain for Teradata-branded hardware.

In addition, Teradata communicates and works closely with FLEX with respect to apply strong human rights, anti-slavery and anti-trafficking requirements, practices, controls and validations regarding DRC conflict minerals. Both are participating members of the Conflict Free Smelters Initiative (CFSI) and apply internationally recognized processes and standards to help assure that DRC conflict minerals derived from forced labour, child labour, violence, threats of violence, slavery and human trafficking are not included in Teradata-branded hardware by Teradata, FLEX or upstream suppliers. Teradata publishes an annual Conflict Minerals Report that describes its initiatives, processes, due diligence and progress with respect to helping make sure that Teradata-branded hardware does not include DRC conflict minerals derived from derived from forced labour, child labour, violence, threats of violence, slavery and human trafficking derived from forced labour, child labour, violence, threats of violence, slavery and human trafficking (see derived from forced labour, child labour, violence, threats of violence, slavery and human trafficking). FLEX does the same (see [https://www.sec.gov/Archives/edgar/data/866374/000110465916123371/a16-12126\\_1sd.htm](https://www.sec.gov/Archives/edgar/data/866374/000110465916123371/a16-12126_1sd.htm)

In short, Teradata demands that its suppliers, including and through its sole-source contract-manufacturer for Teradata-branded hardware, adhere to the same high standards of ethics and integrity as Teradata itself and if suppliers/partners fall short of those standards, the relationship shall be avoided in the first place or ended if the relationship already has been put into place.

## **GOVERNANCE**

Teradata implements, adheres to and is, where applicable, a signatory of the following policies, principles and codes of conduct and as described in the following reports, where applicable, which are referenced above and can be accessed by anyone at <http://www.teradata.co.uk/about-us/code-of-conduct> or <http://www.teradata.co.uk/about-us/corporate-social-responsibilityincluding>:

- ❖ **Teradata Code of Conduct**
- ❖ **Teradata Code of Conduct for Suppliers**
- ❖ **Teradata Code of Conduct for Business Partners**
- ❖ **UN Global Compact Principles**
- ❖ **Electronic Industry Citizenship Coalition (EICC) Code of Conduct Principles**
- ❖ **Teradata Anti-Bribery and Anti-Corruption Policy**
- ❖ **Teradata Conflict Minerals Policy**
- ❖ **Teradata Conflict Mineral Report Teradata Corporate Social Responsibility Report**

Teradata is a formal signatory to the UN Global Compact, in respect of which we have achieved the "GC Advanced" designation for our annual Communication On Progress (COP). The UN Global Compact includes ten principles in the areas of human rights, labour, the environment and anti-corruption. By adopting the principles of, and becoming a signatory to, the UN Global Compact, Teradata embraces, supports and enacts, throughout our sphere of influence, a set of core commitments in the areas of human rights, labour standards, environment and anti-corruption. Our **Corporate Social Responsibility Report** constitutes our annual UN Global Compact COP and further details our commitment in this regard).

<http://assets.teradata.com/resources/ebooks/EB5902-eBook/EB5902.pdf>

In addition to the foregoing, Teradata seeks always to comply with all applicable laws and regulations in all the countries in which we do business

Teradata has a compliance team, led by the global Chief Ethics and Compliance (E&C) Officer and the global E&C Office (which is part of our global Law Department), which also includes close involvement of the following departments at the corporate-group level and the applicable regional and country levels:

- Legal
- Internal Audit, Controller and Enterprise Risk Management
- Security
- Human Resources
- Procurement, Supply-Chain Management & Operations

The Teradata E&C process, charter and reporting/governance model are established by written corporate management policies, which, amongst other things, provides for establishing, communicating, training, certifications, establishing and operating the Teradata Ethics Helpline, monitoring, detecting, addressing, investigating, risk-assessing, implementing controls, implementing preventative actions, implementing mitigation actions, implementing disciplinary/corrective actions, senior management reporting and oversight, Board of Directors Audit Committee reporting and oversight - regarding compliance requirements and practices. The Board of Directors Audit Committee charter also expressly provides for oversight of Teradata E&C initiatives. Many aspects and further details of E&C governance at Teradata are described in the aforementioned (and linked) Teradata Code of Conduct and Teradata Corporate Social Responsibility Report. Governance and compliance with respect to human rights, labour rights, anti-slavery, anti-human trafficking, anti-bribery/anti-corruption, compliance and controls policies are dealt with as part of and in accordance with that E&C governance model.

The chief legal counsel for a region serves as the E&C officer for the corresponding region, and Law Department personnel in various countries serve as E&C deputies. As applied in the UK context at Teradata, our Chief Counsel for EMEA serves as the E&C officer for that region and therefore the UK. He reports directly to the global Chief Legal Officer of the Teradata corporate group and, with respect to E&C-related matters, indirectly with the global Chief E&C Officer (who is based in the UK). He and members of his Law Department team also provide assistance with UK-specific policies, compliance, enforcement and legal guidance, advice and services, including with regard to the UK Modern Slavery Act.

With respect to certain policy/compliance areas, particularized supplemental governance models may apply. For example, with respect to Conflict Minerals (which includes human rights, anti-slavery and anti-human-trafficking considerations and objectives) the aforementioned (and linked) Teradata Conflict Minerals Policy establishes and provides the charter for the Teradata Conflict Minerals Management Committee for conflict minerals oversight, reporting and compliance, as well as linkage to dealing with violations/non-compliance through Teradata E&C processes. Such also is described in the aforementioned (and linked) Teradata Conflict Minerals Report at its Section 10.

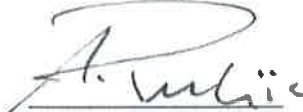
Teradata has not detected, encountered or received reports of any E&C matters over the past 10 years (when it became an independent publicly-traded company) that involve a violation of slavery, human-trafficking or conflict minerals laws/regulations. We intend to continue for years to hone our initiatives, policies, processes and vigilance regarding compliance with respect to these areas and E&C, improve them as opportunities arise and maintain a track-record of compliance with slavery, human-trafficking and conflict minerals laws, regulations and requirements.

## **TRAINING**

All Teradata employees are required to undertake compulsory ethics and compliance training and to certify annually that they have undertaken such training and will comply with Teradata's Code of Conduct. The scope and extent of such training is described further in Section 10 of the aforementioned (and linked) Teradata Corporate Social Responsibility Report. Human rights, labour rights, anti-slavery/trafficking, anti-harassment/discrimination/bullying, anti-bribery/corruption, UN Global Compact principles, EICC Code of Conduct principles, conflict minerals, supplier code of conduct, supplier due diligence and heightened duties of Teradata managers, amongst other things, have been included in such training over the past several years.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Teradata (UK) Limited's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2018.

Signed by Aleksandar Puljic, Director, Teradata (UK) Limited

  
Date: 27 June 2019