Respecting the Rights of Vulnerable Groups Policy

Internal Reference Policy: POLICY-1944

Owning Function: Global Supply Chain

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Purpose

Cisco has had a longstanding commitment to respecting Human Rights[1] throughout our global operations. This includes a commitment to respecting the Human Rights of individuals in our operations and supply chains.

Our work to operationalize this commitment is grounded in our Global Human Rights Policy and led by dedicated teams of subject-matter experts. In accordance with this policy, we implement processes and procedures that aim to respect the rights of vulnerable groups. To help us achieve our goals and commitments, we ask our suppliers and partners to do the same. This policy applies to Cisco's suppliers.

Overview

Cisco recognizes that certain vulnerable groups are disproportionately susceptible to adverse Human Rights impacts. In this context, Cisco commits to the following guiding principles and to working collaboratively through the supply chain to advance these principles in practice.

Defining vulnerable groups. We consider vulnerable groups to include: minoritized religious, political, racial and ethnic communities; marginalized populations; migrant workers; women; children; people with disabilities; LGBTQ+ communities; mining communities; Human Rights defenders; and any other groups of individuals who are disproportionately exposed to adverse impacts or who have inequitable access to remedy. Further guidance on vulnerable groups is provided below.

Respecting the rights of vulnerable groups. Our commitment includes the implementation of a framework to assess and mitigate known risks, and mechanisms to report and remedy grievances where they occur. We conduct due diligence to identify and assess actual and potential adverse impacts and aim to cease, prevent, and mitigate adverse Human Rights impacts. To help us meet this commitment, it is critical that our suppliers consider the impact of their operations on vulnerable groups, take steps to mitigate any adverse impacts, and require their suppliers to do the same.

Commitment to Non-Retaliation. We believe parties should have the ability to raise concerns and report potential violations of this Policy without fear of retaliation. Cisco will not tolerate retaliation against vulnerable groups, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or operations of Cisco or any of its suppliers.

Commitment to ongoing due diligence and capacity building. We are committed to continuous learning to understand how human rights impacts manifest in technology supply chains and how we can best work with our suppliers and stakeholders to mitigate the heightened Human Rights risks faced by vulnerable groups.

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1. Policy

1.1. Supplier Expectations

1.1.1. General expectations

Suppliers must comply with all applicable laws in the jurisdictions in which they operate and with Cisco's Supplier Code of Conduct (hereafter referred to as the "Code of Conduct"). In instances where the Code of Conduct and local law present different standards, suppliers shall adhere to the strictest requirements. In addition to applying these standards in their own operations, suppliers are expected to conduct due diligence and impose comparable standards on their suppliers.

1.1.2. Expectations related to vulnerable groups

Cisco expects suppliers to respect and uphold the rights of vulnerable groups aligned to internationally recognized standards including, but not limited to those enshrined in the UN Declaration of Human Rights[2] and the International Labour Organization's Core Conventions.[3] We expect our suppliers to mitigate the following salient risks for all vulnerable groups identified in this policy:

1.1.2.1. Freedom from forced labor

Suppliers are expected to implement policies and processes that prohibit all forms of forced labor – including forced, bonded (including debt bondage) and indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons – within their operations and supply chains. Suppliers are expected to conduct due diligence in their own supply chains to identify, prevent, and mitigate risks of forced labor set forth in the Code of Conduct and aligned to the ILO indicators for forced labor. This includes any forms of involuntary work, including involuntary overtime.

1.1.2.2. Freedom from working excessive hours

Working hours are not to exceed the maximum set by local law or more than 60 hours per week (including overtime). Workers shall be allowed at least one day off every seven days. All overtime must be voluntary; workers shall not be coerced in any way to accept, remain in, or work excessive hours of employment.

1.1.2.3. Freedom from discrimination

Suppliers should take steps to identify groups at risk of discrimination and take proactive steps to foster an inclusive culture that supports minorities and eliminates workplace harassment and discrimination in all facets of employment. Suppliers are expected to implement policies that prohibit workplace discrimination, harassment, and preferential or adverse treatment on the basis of a person's protected characteristics. This includes preferential or adverse treatment during hiring and recruitment; career advancement and promotion; wages, benefits, and rewards; access to training, and other employment opportunities. Where such treatment occurs, suppliers are expected to take appropriate disciplinary or other remedial actions.

1.1.2.4. Freedom from retaliation

Suppliers shall not and will ensure that their employees or business partners shall not threaten, intimidate, attack, or otherwise retaliate against any vulnerable group.

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1.2. Vulnerable Groups

We expect suppliers to be aware of and address the potential Human Rights risks associated with the following groups:

1.2.1. Religious, political, racial, ethnic minorities, and marginalized populations

People may be subject to discrimination, harassment, or adverse treatment on the basis of their religious or political views, race or ethnicity, or minority status. Minority groups may also be at heightened risk of forced labor —including forced, bonded (including debt bondage) and indentured labor, involuntary or exploitative prison labor, and slavery or trafficking of persons. Suppliers are expected to identify persons at risk of these potential Human Rights impacts and assess, mitigate, and remedy adverse impacts.

1.2.2. Migrant workers

The International Labour Organization[4] recognizes that both foreign and domestic migrant workers[5] are at heightened risk of being subject to forced labor. In particular, they may be more likely to encounter indicators of forced labor such as the payment of recruitment fees[6] withholding of passports and other personal documents, coercion, and barriers to resigning or returning to their home countries or regions. In complying with the forced labor prohibition set out in the Code of Conduct, we expect suppliers to consider the risks migrant workers face as a vulnerable group. Suppliers must ensure that migrant workers are: provided with clear written terms of employment in their native language; permitted to leave supplier facilities (including worker dormitories) at any time; permitted to terminate their employment without penalty; and provided with wages and benefits in line with local law and wages and benefits provided to non-migrant workers in equivalent roles. Suppliers must ensure that migrant workers are never: denied access to personal documents or valuables, including passports; or charged any fees for their employment by the supplier or its business partners.

1.2.3. Women

Women may be disproportionately impacted by health and safety risks and subject to discrimination in certain situations. In line with the Code of Conduct, pregnant women and nursing mothers should be removed from hazardous working conditions and where necessary provided reasonable accommodations and support.

1.2.4. Children

Suppliers are expected to uphold international standards on child labor and prohibit child labor in their operations and supply chains. Suppliers must comply with the provision on Young Workers in the Code of Conduct and the more detailed standards set out in our Juvenile Labor Policy and Expectations. These standards include: implementing robust management systems for verifying workers' ages; facilitating the prompt remediation and protection of well-being of any children found to be working onsite; minimum standards surrounding the engagement of young workers and student workers who are legally permitted to work; and the protection of students' rights.

1.2.5. People with disabilities

The UN Convention on the Rights of Persons with Disabilities defines people with disabilities as those who have long-term physical, mental, intellectual or sensory impairments which may hinder their full and effective participation in society on an equal basis with others. People with disabilities often face barriers in the workplace. Suppliers must not unlawfully discriminate against persons with disabilities and should consider specific measures for staff with disabilities in health and safety plans and make reasonable accommodations where legally required or necessary to allow persons with disabilities to work safely and productively.

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1.2.6. LGBTQ+ communities

Lesbian, Gay, Bisexual, Transgender, Queer + (LGBTQ+[7]) workers often face heightened risk of workplace discrimination or being subjected to a hostile work environment. Suppliers are expected to protect workers and applicants from discrimination on the basis of their sexual orientation, gender identity, or gender expression.

1.2.7. Mining communities

Like many companies in the electronics industry, our products contain various minerals necessary for functionality. Through this connection, Cisco is linked to a complex mineral supply chain which may operate in Conflict-Affected and High-Risk Areas (CAHRAs). Cisco does not directly procure minerals from mines, or from the processors that refine them. However, mine workers and mining communities are considered vulnerable populations because some mine operations can pose serious human rights risks, including forced labor, child labor and other risks for the workers and communities at the beginning of the supply chain. We expect suppliers to support Cisco's ethical procurement practices and economic activity in certain high-risk regions, and artisanal and small-scale mines by maintaining a Responsible Minerals Policy and conducting due diligence aligned to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

1.2.8. Human Rights defenders

As defined by the United Nations, Human Rights defenders[8] are those who, individually or with others, act to promote or protect Human Rights in a peaceful manner. Examples of Human Rights defenders include whistleblowers, trade union organizers, labor rights advocates, environmental activists, Human Rights campaigners, and journalists. They can provide valuable insights into challenging Human Rights, environmental, and other issues.

1.3. Grievances and Non-Retaliation

1.3.1

Where we have identified that we have caused or contributed to an adverse Human Rights impact, we aim to provide access to and cooperation in remediation for affected individuals through legitimate processes[9].

1.3.2

We encourage employees, workers, and other stakeholders to raise any concerns and report suspected violations of this Policy through one of our reporting channels, including the Cisco EthicsLine.

1.3.3

Suppliers must provide workers a safe environment to provide grievance and feedback without fear of reprisal or retaliation. Examples of retaliation can include demotion, disciplinary action, firing, salary reduction, re-assignment, or other adverse consequences.

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2. Policy Compliance

2.1. Compliance Effective Date

This policy is effective July 21, 2023.

2.2. Compliance Measurement

Compliance with Cisco policies is required. Compliance to this policy is verified through various methods, including but not limited to, reports from available business tools, internal and external audits, self-assessment, and/or feedback to the policy owner.

2.3. Compliance Exceptions

There are no exceptions to this policy.

2.4. Non-Compliance

If Cisco learns that any of our suppliers have failed to comply with the below principles, we will take action to investigate, assess, mitigate, and work to remedy Human Rights impacts. In each case our efforts and choice of action will be informed by the situation as it presents itself, and the extent of leverage we can bring to bear to change the wrongful behavior identified. Cisco may terminate relationships with suppliers that do not make substantive and prompt efforts to comply with this policy.

Definitions

For purposes of this policy, the following definitions apply:

[1]**Human rights**	Human rights are the fundamental rights, freedoms, and standards of treatment that are internationally recognized as belonging to all human beings by virtue of being human. Fundamental human rights are found in the United Nations Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, the eight core ILO Conventions, and various covenants and treaties that implement these principles.
[2]**Universal Declaration of Human Rights (UDHR)**	The Universal Declaration of Human Rights was proclaimed by the United Nations General Assembly in 1948. It contains 30 Human Rights that are expected to be universally respected and protected.
[3]**ILO Core Conventions**	The Freedom of Association and Protection of the Rights to Organize Convention, 1948; the Right to Organize and Collective Bargaining Convention, 1949; the Forced Labour Convention, 1930; the Abolition of Forced Labour Convention, 1957; the Minimum Age Convention, 1973; the Worst Forms of Child Labour Convention, 1999; the Equal Remuneration Convention, 1951; and the Discrimination (Employment and Occupation) Convention, 1958.
[4]**International Labour Organization (ILO)**	The International Labour Organization is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers, and workers to jointly shape policies/programs promoting decent work for all.
[5]**Migrant worker**	A person who either migrates within their country of origin (internal migration) or outside it (crossing an international border) to pursue employment.
[6]**Recruitment fees**	Cisco recognizes that responsible employment and recruitment, including its associated fees and costs, is critical to the protection of workers and their rights from risks of debt bondage. Workers shall not be required to pay fees for their employment.

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[7]LGBTQ+	An acronym for lesbian, gay, bisexual, transgender, intersex and queer. The plus sign represents people with diverse sexual orientation, gender identity, gender expression and sex characteristics who identify using other terms.
[8]Human Rights Defender	As defined by the United Nations, “Human Rights Defender” is a term used to describe people who, individually or with others, act to promote or protect Human Rights in a peaceful manner. For a full definition of what Human Rights defenders do, who can be a Human Rights defender, and standards for Human Rights defenders, please visit “About Human Rights Defenders” on the United Nations Human Rights Office of the High Commissioner website.
[9]Legitimate processes	As defined by UN Guiding Principles on Business and Human Rights Section 21.

Americas Headquarters
Cisco Systems, Inc.
San Jose, CA

Asia Pacific Headquarters
Cisco Systems (USA) Pte. Ltd.
Singapore

Europe Headquarters
Cisco Systems International BV Amsterdam,
The Netherlands

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