



Norwegian Transparency Act Report 2024

VMware Norway AS, in liquidation

Introduction

The obligations under the Norwegian Transparency Act apply to the activities of VMware Norway AS, in liquidation ("VMware Norway"). This report was prepared in accordance with the requirements of the Norwegian Transparency Act (the "Act").

VMware Norway is a wholly owned subsidiary of VMware Unlimited International Company, an Irish company, and is a part of the group of companies under the ultimate parent entity, Broadcom Inc., a U.S. publicly traded company listed on the Nasdaq Global Select Market.

For the purposes of this report, "Broadcom," "we," "us," "our," and similar terms include Broadcom Inc. and its subsidiaries, including VMware Norway, unless the context indicates otherwise.

VMware Norway's human rights program is managed as a global program by Broadcom Inc., covering each of Broadcom Inc.'s subsidiaries. As such, this report is prepared based on Broadcom activities, including specific efforts for VMware Norway, and covers the period from October 30, 2023 to November 3, 2024¹.

Our Business

VMware Norway is a dormant subsidiary as of May 2024. VMware Norway does not manufacture products.

Human Rights Program Oversight

At Broadcom, our Board of Directors, through its Nominating and Corporate Governance Committee, oversees our human rights/supply chain program. Our internal Environmental, Social and Governance Steering Committee has a cross-functional Human Rights/Supply Chain Working Group, which manages our human rights program internally and externally.

Broadcom is committed to supporting ethical business conduct, respecting human rights and avoiding complicity in any human rights abuse in our company, operations and supply chain.

Our employment and supply chain practices and policies support the fundamental human rights principles of freely chosen employment, non-discrimination, the elimination of forced and underage labor and the rights of workers to engage in peaceful assembly, organize, freely associate and bargain collectively, as articulated in the International Labour Organization Conventions.

¹ Broadcom Inc.'s fiscal year ended November 3, 2024 is referred to as FY 2024. VMware Norway's latest fiscal year was from February 1, 2024 to October 31, 2024 due to a change in fiscal year ends.



Our Policies on Human Rights

Our policies and practices are the foundation of our human rights program, which are inclusive of VMware Norway:

- [Human Rights Principles](#) – Our Human Rights Principles reflects our commitment to respecting human rights and avoiding complicity in any human rights abuse throughout our company, operations and supply chain.
- [Code of Ethics and Business Conduct](#) – Our Code of Ethics and Business Conduct embodies our commitment to doing business with the highest standards of ethics and integrity, including our commitment to respect human rights and prevent modern slavery. We require our employees to certify that they have read and understand our Code of Ethics and Business Conduct. We comply with all applicable labor laws and expect our business partners to do the same.
- [Supplier Environmental and Social Responsibility Code of Conduct](#) – Our Supplier Environmental and Social Responsibility Code of Conduct (“Supplier Code”), which incorporates the Responsible Business Alliance (“RBA”) Code of Conduct, is the foundation of our responsible sourcing practices, and prohibits modern slavery and human trafficking in the supply chain. Our Supplier Code, along with our contract and purchase order terms, establish our expectations regarding workplace standards and business practices for our suppliers and mandates that our suppliers comply with the law and conduct business in an ethical, legal and responsible manner — including with respect to labor and human rights, health and safety, the environment and anti-corruption.
- [Combating Trafficking in Persons Compliance Plan](#) – We also comply with the U.S. federal government’s requirements for government contractors to combat trafficking in persons (Federal Acquisition Regulation 52.222-50 (Combating Trafficking in Persons), as set forth in our internal Combating Trafficking in Persons Compliance Plan.
- [Recruiter Agreements](#) – Our agreements with external recruiters specifically prohibit certain practices (including charging recruitment fees, retaining or destroying identification documentation, and the use of fraudulent or misleading recruitment practices) associated with modern slavery.

Human Rights Risks Assessments, Engaging with our Suppliers and Assessing Effectiveness

Broadcom regularly takes steps to verify, evaluate and address risks of modern slavery in our business and supply chains and assess the effectiveness of our actions, and in FY 2024, we took the following steps, including:

- [Human Rights Impact Assessment](#) – We conducted a human rights impact assessment (“HRIA”) to identify our most salient human rights concerns that could impact our supply



chain and ensure that our human rights program efforts are focused on our most salient human rights impact areas. Based on the HRIA, the following is a list of human rights concerns that we particularly focus on in our supply chain:

- Forced labor (including recruiting fees and retaining worker identification documents)
 - Working hours and rest days
 - Young workers
 - Worker disciplinary practices (e.g., use of wage fines as punishment)
 - Accurate worker agreements
 - Fair wages
 - Safe and healthy working conditions
 - Freedom of association and collective bargaining
- Internal Human Rights Assessment – As part of our commitment to human rights, we conduct an annual internal human rights assessment. Based on this assessment, we found no human rights concerns, including forced labor, child labor, slavery and human trafficking, in our operations.
 - Annual Supplier Surveys – On an annual basis, we identify and survey our significant suppliers globally (that were not part of our prior surveys) for human rights-related issues. The suppliers surveyed since FY 2021 collectively represent over 93% of our supply chain (based on our FY 2024 supplier spend). We found no instances of forced labor, child labor, slavery or human trafficking among Broadcom’s suppliers through this survey process.
 - New Supplier Onboarding – All new suppliers are screened for potential human rights issues as part of our onboarding process and are required to commit to our Supplier Code.
 - Supplier Continuous Monitoring – All surveyed suppliers, as well as certain new suppliers, are placed in our third-party continuous monitoring program to alert us to emerging human rights issues that might arise with these suppliers.
 - Supplier Human Rights Audits – Our Global Operations and Internal Audit teams regularly audit our suppliers’ operations and compliance with various Broadcom and human rights-related requirements. In their audits, our teams review wage and hour labor laws, working conditions, employment agreements and recruitment fee payments and conduct on-site worker interviews. In addition, we leverage the RBA’s Validated Assessment Program to expand the reach of our supply chain audit efforts.
 - Supplier Certifications – We require our larger manufacturing suppliers to certify adherence to our Supplier Code on an annual basis.
 - Annual Supplier Communications – We send our suppliers our annual expectations to reinforce our commitment to a responsible supply chain and provide our suppliers with information on our supply chain human rights program, including our Supplier Code, and



access to our human rights and preventing forced labor training.

Should nonconformances with our Supplier Code be identified, we would address them with our suppliers in accordance with our Supplier Code and other applicable policies, which may include reviewing impacts, remediation or termination of our agreement with the supplier, as applicable.

Training

We provide mandatory training to all of our employees on our Code of Ethics and Business Conduct. As part of our ongoing efforts to educate and raise awareness of forced labor and human trafficking issues, we provide human rights awareness and forced labor prevention training for relevant employees in our Global Operations, Human Resources, Legal, Procurement and supply chain functions. Our employees working with our U.S. government customers complete combating trafficking in persons and prevention of forced labor training.

We also offer human rights awareness and forced labor prevention training to our suppliers.

Internal Accountability and Reporting Concerns

If our workforce becomes aware of a potential violation of our Code of Ethics and Business Conduct, other Broadcom policies, human rights or applicable laws, it is their responsibility to report it to their manager, Human Resources or our Compliance Officer. We provide a number of avenues to contact our Ethics and Compliance Team, our Compliance Officer and the Audit Committee to report concerns or potential violations, including our [Ethics and Compliance Hotline](#) that is available in all appropriate languages and is hosted by an external firm not associated with Broadcom. The Ethics and Compliance Hotline is available via telephone and online, and employees, contractors and any other third party can report concerns anonymously (where permitted by local law).

Assessment

We have not identified any actual adverse human rights impacts specifically in our operations in VMware Norway. Also, based on VMware Norway's business and employee profile (marketing support) and geography (Norway), we believe the overall risk profile of VMware Norway's own operations and that of its supply chain is low, as such risk profile relates to human rights and labor rights risks specified in the Act.

Measures Implemented to Help Prevent and/or Mitigate Risks of Adverse Impacts

We regularly review and consider improvements to our policies and procedures to further mitigate risks of adverse impacts. In addition to our measures described above, we currently intend to:

- Continue to refine our human rights program to improve our due diligence measures in our efforts to uphold human rights
- Continue to participate in RBA
- Continue to conduct human rights-related assessments
- Follow up regarding any relevant due diligence findings with suppliers to remedy



concerns

We expect that such measures that we have implemented or intend to implement will make it easier for Broadcom to take appropriate actions against the identified human rights risks and violations.

Approval

VMware Norway is supported by various Broadcom functions on a global basis. These functions work collaboratively and regularly consult regarding the risks and processes reflected in this statement.

This statement was approved by the directors of VMware Norway on: June 18, 2025

To learn more about the global governance programs and policies that Broadcom has in place to support compliance and address compliance risks throughout its business, please see the Supply Chain section of our annual [Corporate Responsibility Report](#).



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