



## Modern Slavery and Human Trafficking Statement FY2023

This is a statement made under Section 54 of the UK Modern Slavery Act 2015 and Section 13 of the Australian Modern Slavery Act 2018 (the “Modern Slavery Acts”), and outlines the steps taken by Dropbox during this financial year (1 January 2023 to 31 December 2023) to determine that modern slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business.

The term "modern slavery" is used in this statement to describe a range of situations in which coercion, threats or deceptions are used to exploit individuals and undermine or deprive them of their freedom. These situations are slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour. "Human trafficking" occurs when a person arranges or facilitates the travel of another person with a view to the other person being exploited.

### Who we are - Structure, Business and Supply Chains

Dropbox, Inc., our parent company, is headquartered in San Francisco, California. Over the years, we have incorporated certain international entities around the world, including Dropbox International Unlimited Company based in Dublin, Ireland, which is our international headquarters and largest international entity, and the reporting entity for the purposes of the Modern Slavery Acts. It is reporting on behalf of itself and all its subsidiaries, including, Dropbox UK Online Limited, based in London, United Kingdom, and Dropbox Australia Pty Ltd., based in Sydney, Australia. As of December 31, 2023, we had more than 2,600 full-time employees globally.

Detailed information and data on our structure and operations are available on our [investor relations website](#).

Dropbox was founded in 2007 and is one place to keep life organized and keep work moving. With more than 700 million registered users across 180 countries, we're on a mission to design a more enlightened way of working. For more information on our mission and products, visit [dropbox.com](#).

Our supply chains expand all over the world and primarily consist of IT products and services, operations, and customer support, marketing, sales, and advertising services.

### Our Policies on Modern Slavery and Human Trafficking



Dropbox has adopted a Worldwide Code of Business Conduct and Ethics (“Code of Conduct”) that applies to every director, officer, employee, and independent contractor of Dropbox and its subsidiaries. The full text of our Code of Conduct is posted on the [investor relations website](#). Our Code of Conduct is designed to deter wrongdoing and promote integrity as we do our jobs and run our business. It covers our commitment to not tolerate any form of slavery and human trafficking in our operations, and mandates honest and ethical conduct, including the handling of real or apparent conflicts of interest, compliance with laws, rules, & regulations, fiscal responsibility, prompt internal reporting of violations of the Code of Conduct, and accountability for following the Code of Conduct.

Dropbox strongly believes in ethical, environmentally responsible working conditions and business operations, and we expect our suppliers to do the same. We have certain requirements for our suppliers, based on international standards and our own company values, which are crystallized in our [Supplier Code of Conduct](#).

The inclusion of the Supplier Code of Conduct in our agreements with suppliers means that Dropbox requires them, among other items, to generally respect its workers’ human rights, and to make certain specific commitments in sub-areas of labor laws such as:

- Modern slavery;
- Humane treatment of workers;
- Working hours;
- Wages and benefits;
- Freedom of association;
- Child labor avoidance;
- Non-discrimination;
- Immigration; and
- Compliance with labor and employment laws.

In addition to the above, our Supplier Code of Conduct requires our suppliers to comply with certain high standards in the Health & Safety, Environmental and Ethics areas.

## **Risks of modern slavery**

We researched and continuously review our operations and supply chain to assess the risk to Dropbox of participating or enabling modern slavery, and have determined that the risk is very low. Indeed, because of the nature of our business and of the suppliers we avail of there is, at this time, very little potential for Dropbox to be linked to instances of modern slavery through its operations or supply chains. Notwithstanding this, we remain diligent as to the risks of modern slavery in our business, operations and supply chains.



We have identified that the main risk area that could exist for modern slavery is that Dropbox could be linked to modern slavery practices through its tertiary suppliers (our supplier's suppliers), of which Dropbox has less fidelity and oversight over their activities. This risk is mitigated by the fact that our primary supply base consists of large, mature companies, and we review our arrangements with them on a continuous basis.

To further mitigate this risk, we have included specific clauses on modern slavery in our template agreements which require our suppliers to represent that each of their affiliates, agents and subcontractors have not been involved in any modern slavery and will comply with all anti-slavery and human trafficking laws.

## **Our Due Diligence Processes in Relation to Modern Slavery and Human Trafficking and the Steps We Take**

In addition to including specific clauses on modern slavery and our Supplier Code of Conduct in contracts with suppliers, as described above, Dropbox suppliers are required to go through a comprehensive Dropbox screening and due diligence process before they are engaged by Dropbox, with our material suppliers required to go through a supplementary and more detailed screening focused on modern slavery risks. This process is specifically designed to surface risks and flags associated with suppliers in a number of critical areas, so as to ensure that Dropbox delivers its products and services in compliance with all applicable laws.

In terms of remediation, should the processes and screening described above reveal concerns related to modern slavery in our operations or supply chain, our compliance and legal team would document and review those concerns and assess what actions are needed to make sure any concern is addressed to Dropbox satisfaction, and in compliance with Dropbox policies, including those which directly address modern slavery.

Dropbox's commitment to prevent acts of modern slavery is also reflected in investments made to anti-slavery initiatives. In 2018 Dropbox launched the [Dropbox Foundation](#), a public charitable foundation and separate entity from Dropbox, which focuses on promoting and protecting human rights by partnering with impactful nonprofits in two main ways: unrestricted grants and skills-based volunteering. The initial endowment is of approximately \$20 million that is expected to grow over time. In 2019, we announced that we were partnering with [Allies Against Slavery](#), a nonprofit helping frontline partners identify victims of human trafficking to prevent their exploitation.

## **The Effectiveness of our Policies and Processes**

Dropbox acknowledges that monitoring and addressing modern slavery risks is an ongoing requirement. As our business evolves and develops, we will continue to monitor and improve our modern slavery and human rights initiatives, both in our own right and in working with suppliers.



We strongly believe that our policies and processes effectively minimize modern slavery and human trafficking risks internally and throughout our supply chain. Dropbox also continuously monitors its suppliers to identify any changes in behavior or flags in a timely fashion.

Appropriate reporting is key for efficient policies. We also aim to achieve this objective by enforcing a strict no-retaliation rule, which is contained in our Whistleblower Policy. Indeed, Dropbox won't retaliate against any person for bringing a complaint in good faith or participating in any investigation in good faith, which includes where such concerns relate to modern slavery within the operations and supply chains, and we won't tolerate retaliation by anyone either. Following the due diligence and remediation processes that Dropbox undertakes and noted above, Dropbox, on a regular basis, reviews its existing policies and procedures as they relate to modern slavery in accordance with how we understand modern slavery can evolve.

We strive to maintain the highest ethical standards at Dropbox. We are committed to having a workplace in which employees can report any ethical concerns which are in violation of our policies, free of any harassment, discrimination, or retaliation. With the inclusion of the Supplier Code of Conduct in our agreements with suppliers, we have extended this commitment to all persons involved in any of our supply chains.

Finally, we are confident that our investment in non-profit partners that are taking actions against modern slavery will have a positive impact within the business and on a greater scale generally.

## **Our Internal Training**

Dropbox requires employees that are in a position to best identify possible risks or instances of modern slavery, and all our procurement teams, to participate in an annual modern slavery training that outlines the applicable legislation, Dropbox's action to tackle these issues, and the steps to take in case of identified concerns. Dropbox creates its own materials, and reviews this content annually to ensure it is fit for purpose. Dropbox then updates the training accordingly with any changes made internally to its processes.

Also, as part of our onboarding process, all our employees are required to undergo mandatory training that includes the topics covered in the Dropbox Code of Conduct. A similar training is repeated annually, and all employees must also certify annual compliance with the Code of Conduct.

Finally, we also offer a wide range of training on several areas for the professional and personal growth of our employees, which include topics such as Diversity, Equity, and Inclusion; Collaboration & Confrontation; and Anti-Harassment Training.



## Consultation

The policies, training, and processes described in this statement apply to all entities within the Dropbox's group of companies. This, coupled with a meaningful and ongoing dialogue between the relevant areas of the business and the teams involved with contracting with suppliers ensures that all relevant teams are aware the possible risks and of the actions they are required to take based on our internal policies.

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This statement has been approved by the Board of Directors of Dropbox International Unlimited Company on 17 June 2024 and signed by a director. It will be reviewed and updated every year as necessary.