Palo Alto Networks Human Trafficking & Anti-Slavery Statement

Introduction

At Palo Alto Networks, our vision is a world where each day is safer and more secure than the one before.

Palo Alto Networks is committed to ensuring that our supply chain is free from human trafficking or modern slavery. We believe in upholding the human rights of all workers and treating workers with dignity and respect. We do not tolerate or accept use of forced or child labor in our supply chain. We have implemented a number of policies in support of the protection of human rights, which can be found on our website here. We have also implemented numerous internal policies at the global and local level, including local work rules, ensuring our employees know of our commitments and the various avenues available to them to raise concerns.

The *United Kingdom Modern Slavery Act 2015* and the *Australia Commonwealth Modern Slavery Act 2018* together require disclosure of information relating to applicable business efforts to address the risks of modern slavery (including forced labor and human trafficking) in their operations and supply chains. This statement by Palo Alto Networks, Inc., and its consolidated subsidiaries[1] responds to these requirements and outlines our efforts in this regard during the fiscal year ended July 31, 2023.

Structure, operations, and supply chain

Palo Alto Networks Inc. was incorporated in 2005 and is headquartered in Santa Clara, CA. As of the end of the fiscal year, which ended on July 31, 2023, the Company had approximately 13,948 employees located in over 30 countries (including 416 employed in the United Kingdom and 315 employed in Australia). We provide cybersecurity software services and industry leading lines of security hardware that empower enterprises, organizations, service providers, and government entities to protect themselves against today's most sophisticated cyber threats. Our cybersecurity platforms and services help secure enterprise users, networks, clouds, and endpoints by delivering comprehensive cybersecurity backed by industry leading artificial intelligence and automation. We are a leading provider of zero trust solutions, starting with next-generation zero trust network access to secure today's remote hybrid workforces and extending to securing all users, applications, and infrastructure with zero trust principles. Our security solutions are designed to reduce customers' total cost of ownership by improving operational efficiency and eliminating the need for siloed point products.

Palo Alto Networks, Inc. and its subsidiaries operate worldwide and are collectively known as Palo Alto Networks. A complete list of subsidiaries, as of the end of the fiscal year ended July 31, 2023, can be found in Exhibit 21.1 to Palo Alto Networks, Inc.'s Form 10-K, filed with the US Securities and Exchange Commission on September 1, 2023.

Palo Alto Networks outsources the manufacturing of our products to various manufacturing partners, including our electronics manufacturing services provider ("EMS provider") and original design manufacturers. Our providers assemble our products using design specifications, quality assurance programs, and standards that we establish, and procure components and assemble our products based on our demand forecasts. Palo Alto Networks and our partners source component parts within our hardware products from more than 300 suppliers

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[1] Palo Alto Networks, Inc. and its consolidated subsidiaries share the same core business operations and supply chains as well as the modern slavery policies, processes and risks further described in this statement. Palo Alto Networks, Inc. therefore provides this statement for itself and on behalf of certain foreign subsidiaries that are directly covered by a disclosure obligation in their respective jurisdictions. Currently this includes Palo Alto Networks (Australia) Pty Ltd. and Sinefy Pty Ltd, pursuant to the Commonwealth Modern Slavery Act 2018; and Palo Alto Networks (UK) Limited, Palo Alto Networks (UK Holding 1) Limited, Palo Alto Networks (UK Holding 2) Limited, and Palo Alto Networks FS International Limited, pursuant to Section 54(1) of the UK Modern Slavery Act 2015.

within 30 countries across Asia, North America, and Europe. Our operations also include design and product development, supply chain management, marketing, sales, customer support, and administrative operations.

Risks of modern slavery and actions taken to assess and reduce risks

We recognize that a global supply chain starting at mineral extraction and ending with product assembly presents modern slavery and forced labor risks. We believe these risks predominate in mineral extractive industries and with manufacturing suppliers operating in countries where a high volume of migrant labor is utilized and where there is potentially a lack of adequate legal protections for migrant workers. In our own operations, we believe the risks of modern slavery and forced labor are predominantly associated with third-party service providers who support our office operations, including facility, custodial, and security staff. The risks associated with the use of such third-party service providers likewise primarily revolve around the potential use of a migrant workforce where knowledge of employment rights may be lower and therefore the risks of forced labor may be higher.

To help assess and mitigate the risks inherent in our supply chain, Palo Alto Networks has implemented a Conflict Minerals Policy and attendant Conflict Minerals program, using leading industry developed tools from the Responsible Minerals Initiative to help track specific minerals from the mine to the smelter or refiner. We conduct annual surveys to minimize risk associated with use of components from regions with highest known risks of modern slavery and forced labor. We use due diligence and risk monitoring tools designed to notify us of credible public allegations and concerns relating to modern slavery and forced labor use by companies within our supply chain. We require suppliers to certify their adherence to and fidelity with Palo Alto Networks' Global Supplier Code of Conduct. Where applicable, our suppliers must also verify their compliance with the Responsible Business Alliance (the "RBA") Code of Conduct. We work to effectuate positive change within our supply chain by using relevant information and certifications to encourage improvements and remediation of behavior that falls short of our expectations, removing vendors and suppliers who fail to meet our high-standards and expectations as necessary.

Palo Alto Networks supports the United Nations Global Compact and the protection of internationally proclaimed human rights and labor standards. In furtherance of our commitment, Palo Alto Networks is an Affiliate Member of the RBA and adheres to the RBA Code of Conduct. Our Global Supplier Code of Conduct requires our supply chain partners to support this initiative and requires our suppliers to:

1) strictly prohibit human trafficking;

2) ensure all employment or services are freely chosen;

3) strictly prohibit child labor;

4) ensure workweeks are not excessive and are in compliance with local law;

5) pay compensation in accordance with local law;

6) ensure there is no harsh or inhumane treatment of its workers;

7) ensure a workforce free of harassment and unlawful discrimination;

8) provide freedom of association for all workers, in conformance with local law;

9) implement and maintain an occupational health and safety program; and

10) implement a grievance mechanism to allow workers to report concerns.

Palo Alto Networks employees receive annual training on our Code of Business Conduct and Ethics. The training establishes and makes clear our expectations that all employees comply with the Code of Business Conduct and Ethics, which includes relevant provisions on protection of human rights and treatment of workers, including strict prohibition on modern slavery and forced labor. In addition, employees involved in hardware sourcing receive regular periodic training to maintain and enhance their knowledge of applicable global

regulations and best practices. This may include, but is not limited to, attending webinars, roundtables, and conferences, or reviewing internal and external training materials.

Due diligence processes and remediation

Palo Alto Networks takes a risk-based approach to due diligence, focusing resources on sector and geographic specific risks, incorporating an annual questionnaire that requires disclosure of certain labor practices and policies, and the use of continuous due diligence and risk monitoring tools to help identify red flags relating to potential failures of vendors and suppliers to abide by their modern slavery and forced labor obligations.

Palo Alto Networks maintains a culture of open communication and encourages anyone with a good-faith concern to speak up without fear of retaliation. We have implemented multiple internal and external communication channels to make it convenient for employees, business partners, and members of our community to ask questions, provide feedback, or report concerns. As outlined above, we require the same from our suppliers. Palo Alto Networks is committed to investigating any credible report of potential modern slavery and forced labor or other applicable Code of Conduct violations in a fair, consistent, comprehensive, and objective manner. In line with our core beliefs, we confirm that we will take all appropriate and necessary steps to rectify any confirmed incidences of modern slavery and forced labor in our operations or supply chains.

Assessing the effectiveness of actions taken to address modern slavery risks

During this reporting period, Palo Alto Networks assessed the effectiveness of our actions through the information collected in its annual partner surveys, conversations with suppliers, and the tools we utilized to conduct due diligence and assess risk.

Consultation

Palo Alto Networks is a well-integrated business. The same practices and procedures regarding responsible business and core ethics and compliance requirements apply to all global subsidiaries, affiliates, and related entities. We have communicated with entities which we own and control regarding this statement and our approach to modern slavery and forced labor, mandating compliance with the policies and processes set out in this statement.

Approval

This Human Trafficking & Anti-Slavery Statement was approved by the Board of Directors of Palo Alto Networks (UK) Limited and the Board of Directors of Palo Alto Networks (Australia) Pty Ltd.

Fiscal year ended July 31, 2023.