



UK Modern Slavery and Human Trafficking Statement

Box Intl Holdings Ltd., Box Intl Technology Ltd. and Box.com (UK) Ltd.

Fiscal Year 2020

This statement is made by Box Intl Holdings Ltd., Box Intl Technology Ltd. and Box.com (UK) Ltd. (collectively, the “**Box UK Entities**” and each a “**Box UK Entity**”) in accordance with its obligations under s. 54 Modern Slavery Act 2015 (the “**Modern Slavery Act**”). It sets out the steps taken by the Box UK Entities during the fiscal year ended 31 January 2020 to prevent modern slavery and human trafficking in its business and supply chain. For the purposes of this statement, any reference to “**Box**” or the “**Company**” is a reference to each and every company within the Box group of companies (including the Box UK Entities), as we uphold the values set out in this statement, regardless of geographic location.

We are committed to upholding the highest ethical standards, and complying with all relevant laws and regulations (including the Modern Slavery Act). We are also committed to ensuring transparency in how we conduct our business, and the prevention of modern slavery in our supply chain.

Box's Organizational Structure and its Business

Each Box UK Entity is an indirect subsidiary of Box, Inc. (the group parent company), which is headquartered in the United States in Redwood City, California, and has a presence in a number of other markets around the world. In the UK, Box operates via its three UK subsidiaries, Box Intl Holdings Ltd., Box Intl Technology Ltd. and Box.com (UK) Ltd.

At Box, we are dedicated to powering how the world works together. Our cloud content management platform helps nonprofits fulfill their missions by providing a single place to manage, secure, share and govern their content and processes for internal and external collaborators so they can execute and scale programs, generate support and streamline administration to better focus on their mission.

Through Box.org, which is a part of Box, Inc. and not a separate legal entity, we donate and discount our products to non-profits, who use our cloud content management platform to drive positive social outcomes. Backed by Box, non-profits can heighten how they manage and scale programs, grow their base of support and simplify administrative workflows. For example, we have partnered with the International Rescue Commission to improve its agility in responding to humanitarian crises by providing instant access to the information they need with arriving at new locations. Box improves the ability of IRC staff to collaborate across internal teams and network with external partners to achieve their mission. In addition, we work with the Global Emancipation Network and others to power their digital organizations, and build a digital workplace to achieve greater social good.

Box Values

Across the Box group our core [values](#) set out how we act as a business, and what we expect of all of our employees, whether they are dealing with other members of the business, customers or suppliers. In order for an organization to help prevent human trafficking, its people need to follow a set of principles that encourages behavior that aligns with such an initiative.



One of our core values is to foster an environment of safety and trust and do right by one another both inside and outside of the company (“**Make Mom Proud**”), and we hope to demonstrate this value in all aspects of our business. To further support Box’s efforts to encourage these principles in all of its business practices, each of our employees is expected to comply with all applicable laws, including the Modern Slavery Act. By being honest and transparent about our supply chain and empowering our employees with mechanisms to enforce our values (e.g., Box’s online ethics and whistleblower reporting option or hotline number), Box’s employees are well-positioned to help fight human trafficking. We have strived to act in accordance with these values throughout the last fiscal year and will continue to do so.

Box Policies Regarding Slavery and Human Trafficking

Each Box UK Entity adheres to the Box, Inc. “[Code of Business Conduct and Ethics](#)” (the “**Code**”), which requires, among other things, that our directors, officers and employees must not (nor instruct others to) engage in any unlawful activity in conducting the company’s business or in performing their day-to-day company duties. This Code has been in force during the last fiscal year and applies to all the companies within the Box group, including the Box UK Entities. We have continued to act, and require each of our directors, officers and employees to act in accordance with this Code throughout the last fiscal year.

In addition, directors, officers and employees are obliged not only to deal with our customers, suppliers, competitors and other employees lawfully, but also ethically in all business dealings on the Company’s behalf. This includes acting in compliance with the Modern Slavery Act.

All the Box UK Entities’ directors, officers and employees are supplied with a copy of the Code. If an employee becomes aware of an actual or imminent breach of the Code, they are obliged to escalate the issue.

With respect to the conduct of our suppliers, we expect our suppliers to comply with applicable laws, including the Modern Slavery Act. Should Box become aware of any policy violations or issues related to slavery or human trafficking, we will consult with our legal team to ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with any supplier conducting its business in such a manner.

Box’s Modern Slavery Risks, and the Steps Taken to Address Those Risks

Each Box UK Entity considers its modern slavery risk to be generally low, particularly because of the sector in which it operates, the nature of its supply chains, and the values, policies and the Code of Business Conduct and Ethics which its employees, directors and officers are required to adhere to. However, to the extent that a risk of modern slavery, or a potential modern slavery incident was identified within our business or supply chain, we would investigate and deal with that incident in accordance with our Code of Business Conduct and Ethics.



This statement was approved by the Board of Directors of Box Intl Holdings Ltd., Box Intl Technology Ltd. and Box.com (UK) Ltd. on 10 December 2019.

/s/ Dylan Smith _____
Dylan Smith
Director, Box Intl Holdings Ltd.

/s/ Dylan Smith _____
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/s/ Dylan Smith _____
Dylan Smith
Director, Box.com (UK) Ltd.