



## Modern Slavery and Human Trafficking Statement FY2024

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 2024 to 31 December 2024) to determine that modern slavery and human trafficking is not taking place in any of our supply chains or 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 through force, fraud, or coercion 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 (“Dropbox International”), 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 (ACN 168 008 240), based in Sydney, Australia.

Dropbox International is an international subsidiary of Dropbox, Inc. and is engaged in sales and marketing, customer support and technical operations, general administrative, and research and development activities. Dropbox International serves as the regional headquarter for Dropbox's operations outside of the U.S., Canada, and Mexico. As of December 31, 2024, we had more than 2,200 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 the 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, facilities management, office supplies, operations and customer support, marketing, sales, and advertising services. In



general, our supplier relationships are stable and long term; however, from time-to-time the nature of certain activities demands short term and changeable relationships with certain suppliers.

## **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, and 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 suppliers to generally respect their workers’ human rights, and to make certain specific commitments in areas such as:

- Modern slavery;
- Humane treatment of workers;
- Working hours;
- Wages and benefits;
- Freedom of association;
- Child labour avoidance;
- Non-discrimination;
- Immigration; and
- Compliance with labour 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 and safety, Environmental, and Ethics areas.

## **Risks of Modern Slavery**

We research and continuously review our operations and supply chain to assess the risk to Dropbox of participating in or enabling modern slavery and have determined that the risk is low. Indeed, because of the nature of our business and that of the suppliers we avail, there is, at this time, very little potential for Dropbox to be linked to instances of modern slavery through its operations or supply chains. Furthermore, most of our suppliers are in low-risk jurisdictions. 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 suppliers' suppliers), as Dropbox has less oversight over such suppliers' activities and the source countries of the goods and services Dropbox procures through our suppliers (which may be in locations where the risks of modern slavery are higher). 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 regular basis.

We also acknowledge that the risk of modern slavery practices is increased where our suppliers and tertiary suppliers are operating in high-risk geographies or sectors. For example, electronics hardware is considered a higher-risk sector for modern slavery due to reports of forced labour in manufacturing facilities in certain geographies with minimal regulation and oversight. There is a risk that these factories may be used by suppliers of office supplies and IT equipment.

To further mitigate this risk, we have included specific clauses on modern slavery in our template supplier agreements that 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's satisfaction, and in compliance with Dropbox policies, including those that directly address modern slavery.

## **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 plan to continue to monitor and improve our modern slavery and human rights initiatives, both in our own right and in working with suppliers.

We 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 from a modern slavery and human trafficking risk perspective in a timely fashion.

Appropriate reporting is key for assessing whether policies are effective at achieving their aims. 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, which are described 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 that are in violation of our policies, free of any harassment, discrimination, or retaliation, so that we can understand whether our actions to assess and address modern slavery risks are effective. 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.

## **Our Internal Training**

Dropbox requires employees that are in the 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 sessions for the professional and personal growth of our employees, including sessions that address Collaboration and Confrontation and Anti-Harassment.

## **Consultation**

The risks, policies, training, and processes described in this statement apply to all entities within the Dropbox 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 of the possible risks and of the actions they are required to take based on our internal policies.



## Forward Looking Statements

Certain statements in this Modern Slavery and Human Trafficking Statement may constitute “forward-looking” statements within the meaning of the U.S. Private Securities Litigation Reform Act of 1995 that relate to our current expectations and views of future events. These forward-looking statements are subject to risks, uncertainties, and assumptions, some of which are beyond our control. In addition, these forward-looking statements reflect our current views with respect to future events or our company’s performance and are not a guarantee of future performance. Actual outcomes may differ materially from the information contained in the forward-looking statements as a result of a number of factors.

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This statement has been approved by the Board of Directors of Dropbox International Unlimited Company on June 23, 2025 and signed by a director. It will be reviewed and updated every year as necessary.



This Statement was approved by the Dropbox International Unlimited Company Board of Directors and covers all activities undertaken by entities in the Dropbox group.

Signed this 23<sup>rd</sup> day of June, 2025.

/s/ Maria McSweeney  
Signature

Maria McSweeney  
Full Name

Director, Dropbox International Unlimited Company  
Title