



## GLOBAL SUPPLIER CODE OF CONDUCT

August 18, 2020

Gigamon conducts its business ethically, respectfully, and with integrity, and we fully expect our Suppliers to do the same. The Global Supplier Code of Conduct applies to all suppliers of Gigamon products or services, including but not limited to, staffing agencies, contractors, licensors, component suppliers and any subcontracted party performing work on behalf of Gigamon (“Suppliers”). As a Gigamon Supplier, we expect you to abide by all the applicable laws and regulations that apply to wherever you do business. In short, Gigamon acts ethically in all business dealings and holds our Suppliers to the same ethical standards that we hold ourselves to.

### 1 Workplace Integrity

Here at Gigamon, we are committed to diversity and treating our employees with respect and dignity. Suppliers must comply with all employment and safety laws, uphold the human rights of all employees, and strive to build a diverse and inclusive workplace.

#### A. Anti-Discrimination

Suppliers should only make employment-related decisions based on an individual’s skills and aptitude and never on characteristics that may include: Race, Color, Religion, Nationality, Gender, Age, Medical Condition or Disability, Pregnancy, Marital Status, Political Affiliation, Sexual Orientation, Military Status, or any other basis protected by law. We strongly encourage our Suppliers to embrace diversity into their own business processes.

Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination must be based solely on the worker’s skill, ability, experience and performance.

#### B. Harassment

Solid teamwork also requires people to treat each other with dignity and respect. Harassment or bullying in the workplace should not be allowed or tolerated by the Suppliers. Suppliers are expected to maintain an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Suppliers are also expected to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

### C. Health, Safety, and Human Rights

We expect our Suppliers to provide and maintain a safe and healthy work environment for their workers that complies with all applicable health and safety laws and regulations. Supplier shall take proactive measures to prevent any workplace hazards.

### D. Wage and Benefits

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Deduction from wages as a disciplinary measure should not be permitted.

### E. Child Labor

Gigamon does not tolerate any form of child labor in our supply chain. We expect our Suppliers to prevent child labor in their operations and encourage our Suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain. No individuals shall be hired under 15 years of age, or 14 years of age where local law allows, or under the legal minimum age defined by the International Labour Organization (ILO) or applicable local laws. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety.

### F. Forced Labor and Human Trafficking

Gigamon requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including but not limited to any form of prison, slave, bonded or forced indentured labor.

## 2 Anti-Corruption

No matter where you conduct business for Gigamon, all Suppliers must abide by anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act. You must not tolerate, permit, or engage in any form of corruption, extortion, or bribery. This is true whether you are working with government officials or individuals in the private sector.

Suppliers are expected to exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, and the hiring of intermediaries such as agents or consultants.

### A. Bribery

Bribery is offering or giving something of value in order to improperly influence the recipient’s actions. Bribery is illegal everywhere we do business, and the consequences for offering or accepting a bribe are severe. You may never offer, authorize, give, promise, or accept any form of a bribe, extortion payment, improper payment, gift, or benefit while working on Gigamon’s behalf.

## B. Kickback

A kickback is the return of a sum paid as a reward for fostering a business arrangement. Accepting or offering a kickback violates this Supplier Code.

## C. Fair Competition

Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors. Suppliers must refrain from participating in a cartel.

## D. Gifts

Suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

As a general rule, Suppliers should not offer any gift other than token gifts (for example, modest company-branded items) or any entertainment or meal to any Gigamon employee other than modest meals, or anything that could reasonably be expected to create a sense of obligation, or that is given with the intent to influence a business decision. In addition, Suppliers should never offer anything of any value to Gigamon employees during a period in which a Request for Proposal (RFPs) or other vendor-selection process is ongoing.

## 3 Conflicts of Interest

Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers are expected to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of Gigamon and personal interests or those of close relatives, friends or associates.

## 4 Financial Integrity

Suppliers will accurately and completely record all business information and comply with all applicable laws regarding accounting and other business records. Suppliers must not engage in false and/or misleading accounting practices and all records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented.

Our business relationships are governed by contracts and obligations negotiated by all parties involved. Suppliers should be familiar with and comply with the requirements of any agreements in place. Please note that any contractual obligations with Gigamon also apply to the vendors and subcontractors who work with you on the services that you provide to Gigamon.

## 5 Trust

Gigamon protects your confidential information, and in return, we trust Suppliers to protect our confidential information as well. Suppliers shall not use or disclose confidential information of

Gigamon except in performance of the Supplier's services to Gigamon. Suppliers shall protect all Gigamon confidential information to the same degree as they protect their own confidential information, but in no case less than with a reasonable degree of care. Information should not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is express written authorization from Gigamon.

#### A. Intellectual Property

Suppliers must comply with all the applicable laws and contractual obligations governing intellectual property rights, including with regard to Gigamon's inventions, whether trade secrets, patents, copyrights, or trademarks. You may not use or disclose any of such intellectual property rights except in service of obligations to Gigamon and in conformance with your contractual obligations. Gigamon expects you to respect intellectual property rights of Gigamon and other companies. You may not obtain, distribute, or use unlicensed software or information without proper authorization.

#### B. Information Security

Suppliers must protect the confidential and proprietary information of Gigamon and others, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Suppliers must comply with applicable data privacy laws.

### 6 Environment

Suppliers are expected to follow all applicable environmental laws, regulations, and standards, including but not limited to, requirements for chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. Suppliers must comply with all requirements regarding conflict minerals, exercise proper due diligence, and provide evidence that they are in compliance when requested.

### 7 Import and Export

Gigamon complies with all U.S. and non-U.S. trade laws and regulations that apply to our business and expects our Suppliers to do the same. Suppliers must have and follow an export control program that complies with U.S. and all other applicable export and import laws and regulations that may apply to goods, technology, hardware, software, intellectual property, and technical information.

### 8 Reporting

The Global Supplier Code of Conduct serves as a guide to ethical Supplier conduct. In the event that expectations of this Code are not met, the business relationship may be reviewed and terminated. We encourage you to report anyone, whether an employee of Gigamon or a Supplier, if you suspect they are not meeting the standards in this Supplier Code. Please send any such concerns to [ethics@gigamon.com](mailto:ethics@gigamon.com) so that we may investigate and address the issue.