



California Transparency in Supply Chains Act of 2010

The California Transparency in Supply Chains Act of 2010 (SB 657) requires retailers and manufacturers, who conduct business in California and have gross worldwide sales over \$100 million, to disclose their ongoing efforts to eliminate slavery and human trafficking from their supply chain.

1. Fortinet's Supply Chain Verification

- Fortinet is committed to eliminating human trafficking and slavery from our supply chain. All suppliers must conduct themselves honestly and ethically in order to work with us. If Fortinet has actual knowledge of any unethical behavior, we will investigate the issue in our supply chain. Fortinet does not routinely engage any third party to verify compliance within our supply chain. Suppliers must comply with all applicable laws and regulations when engaged by Fortinet.

2. Fortinet's Supply Chain Audits

- Fortinet's standard manufacturing agreement gives us the right to conduct unannounced audits for human trafficking issues. If Fortinet has actual knowledge of noncompliance, we use due diligence in investigating and resolving the issue. Fortinet does not routinely engage any third party to conduct independent or unannounced audits of our supply chain.

3. Fortinet's Direct Supplier Certification

- Fortinet's policy is to require all of our direct suppliers to agree to comply with all applicable laws and regulations for all work they perform with Fortinet. This is often accomplished by including compliance language in the contract or purchase order. Additionally, Fortinet's standard manufacturing agreement includes specific language prohibiting human trafficking and giving us the right to unannounced audits.
- If Fortinet discovers any supplier is out of compliance, it is considered a breach of contract. We will take reasonable steps to ensure that the issue is corrected by the supplier. If the supplier is unable to correct the problem within a reasonable time, Fortinet will use our discretion to take disciplinary action, including terminating the business relationship with the supplier.

4. Fortinet's Accountability Standards

- All Fortinet employees and contractors are required to comply with Fortinet's Code of Business Conduct and Ethics, and Fortinet's Employee Handbook. Fortinet employees certify compliance annually. Both cover such important concepts as anti-bribery, anti-discrimination, conflicts of interest, compliance with all laws, etc. Any employee who does not follow these policies may be subject to disciplinary action, up to and including termination of employment.

5. Fortinet's Employee Training

- As part of Fortinet's continuous commitment to ethical business practices, we provide training on human trafficking issues to our employees in operations and shipping who actively work with our supply chain.