

FORTINET, INC.
Conflict Minerals Policy
May 2014

Recognizing the legal and compliance risks and other possible adverse impacts that may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (“Conflict Minerals”), Fortinet, Inc. (“Fortinet”) commits to make reasonable efforts, subject in all events to each supplier’s position in the supply chain and Fortinet’s relative leverage with respect to each supplier, to implement the following policies, and Fortinet hereby notifies its suppliers that it expects its suppliers to abide with policies below:

Regarding serious abuses associated with the extraction, transport or trade of Conflict Minerals:

- I. If sourcing from conflict-affected and high-risk areas, Fortinet will use reasonable efforts designed to ensure it does not knowingly profit from, contribute to, assist with or facilitate the commission by any party of the following, and it shall use reasonable efforts to seek the same commitment from its suppliers by integration of this Conflict Minerals Policy into its supplier agreements or by using reasonable efforts to subject its suppliers to this Conflict Minerals Policy, through publicly posting the policy online or other measures:
 - any forms of torture, cruel, inhuman and degrading treatment;
 - any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
 - the worst forms of child labor, as set forth in ILO Convention No. 182;
 - other gross human rights violations and abuses such as widespread sexual violence; or
 - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

- II. If Fortinet determines that a supplier is profiting from, contributing to, assisting with or facilitating the commission by any party of the acts identified in Section I, Fortinet will enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from engagement with the supplier to positively influence the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Fortinet from the applicable supplier.

Regarding support to non-state armed groups:

- III. Fortinet shall not knowingly support non-state armed groups through the extraction, transport, trade, handling or export of Conflict Minerals, and it shall use reasonable efforts to seek the same commitment from its suppliers by integration of this Conflict Minerals Policy into its supplier agreements or by using reasonable efforts to subject its suppliers to this Conflict Minerals Policy, through publicly posting it online or other measures. “Support” to non-state armed groups through the extraction, transport, trade, handling or export of Conflict Minerals includes, but is not limited to, procuring Conflict Minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups who:
- illegally control mine sites or otherwise control transportation routes, points where Conflict Minerals are traded and upstream actors in the supply chain;
 - illegally tax or extort money or Conflict Minerals at points of access to mine sites, along transportation routes or at points where Conflict Minerals are traded; and/or
 - illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of support to non-state armed groups:

- IV. If Fortinet determines that a supplier is sourcing from any party providing support to non-state armed groups as defined in Section III, Fortinet will enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from engagement with the supplier to positively influence the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Fortinet from the applicable supplier.

Regarding support to public or private security forces:

- V. With respect to Conflict Minerals, Fortinet shall not knowingly support public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or Conflict Minerals at point of access to mine sites, along transportation routes or at points where Conflict Minerals are traded; or illegally tax or extort intermediaries, export companies or international traders, and it shall seek the same commitment from its suppliers by integration of this Conflict Minerals Policy into its supplier agreements or by using reasonable efforts to subject its suppliers to this Conflict Minerals Policy, through publicly posting the policy online or other measures.

- VI. In the event it so engages public or private security forces, Fortinet shall only engage public or private security forces in accordance with the Voluntary Principles on Security and Human Rights, and it shall use reasonable efforts to seek the same commitment from its suppliers by integration of this Conflict Minerals Policy into its supplier agreements or by using reasonable efforts to subject its suppliers to this Conflict Minerals Policy, through publicly posting it online or other measures.

Regarding risk management of support to public or private security forces:

- VII. If Fortinet determines that a supplier is supporting public or private security forces in violation of Sections V or VI above, Fortinet will enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from engagement with the supplier to positively influence the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Fortinet from the applicable supplier.

Regarding bribery and fraudulent misrepresentation of the origin of Conflict Minerals:

- VIII. Fortinet will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of Conflict Minerals or to misrepresent taxes, fees and royalties paid to governments for the purposes of Conflict Mineral extraction, trade, handling, transport and export, and it shall seek the same commitment from its suppliers by integration of this Conflict Minerals Policy into its supplier agreements or by using reasonable efforts to subject its suppliers to this Conflict Minerals Policy, through publicly posting the policy online or other measures.

Regarding risk management of bribery and fraudulent misrepresentation of the origin of Conflict Minerals:

- IX. If Fortinet determines that a supplier is engaging in bribery or fraudulent misrepresentation to conceal or disguise the origin of Conflict Minerals, Fortinet will enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from engagement with the supplier to positively influence the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Fortinet from the applicable supplier.

Changes to policy

- X. Fortinet reserves the right to make changes to this policy at any time in its sole and absolute discretion.