Fortinet, Inc.

Global Human Rights Policy

“We believe it is our duty to make the world a safer and more sustainable place. Making social responsibility an integral part of our business allows us to improve the way we work, connect, innovate, and impact the world around us. We view respect and protection of human rights as a meaningful part of our commitment to social responsibility.” – Ken Xie, Founder, Chairman and CEO of Fortinet.

COMMITMENT TO HUMAN RIGHTS

As a global cybersecurity leader, we leverage our capabilities for technological innovation to help keep individuals and businesses secure and protect individuals’ and business’ sensitive data and property.

Protecting human rights is core to our business, and we are committed to taking reasonable steps designed to ensure respect for human rights across our business.

We have included references to our culture of respecting and protecting human rights in numerous of our codes, principles, policies and agreements, including:

- Company Code of Conduct
- Partner Code of Conduct
- Supplier/Vendor Code of Conduct
- Fortinet Statement on Modern Slavery
- Fortinet Diversity & Inclusion Report
- Fortinet Privacy Policy
- End-User License Agreement
- Fortinet Corporate Social Responsibility (CSR) Hub

Fortinet is committed to:

- Conducting business ethically and taking reasonable steps designed to ensure respect of internationally recognized human rights as expressed in the International Bill of Human Rights;

- Adopting responsible business practices consistent with the UN Guiding Principles on Business and Human Rights (UNGPs);
• Implementing an ongoing human rights due diligence processes to help identify certain human rights risks and improve our human rights approach, and taking appropriate steps designed to mitigate the risks and improve our approach;

• Contributing to the protection of human rights by, among other actions, helping safeguard our customers’ privacy and security online.

MEETING OUR COMMITMENTS

We have set principles and policies that govern the actions and behavior of individuals and organizations within our value chain, including our suppliers, end-customer, channel partners, and employees, such as the following:

• **Our Supply Chain:** We work with our suppliers and contractors to help ensure that our products and services are built in workplaces that are safe and respectful for individuals’ rights. Through our Global Supplier Code of Conduct and Contract Manufacturer agreement, we communicate our expectations regarding human rights and labor standards across our supply chain. We also exercise our diligence to assess and screen prospective Fortinet vendors and suppliers for human rights violations through a risk-based screening compliance process.

• **Our End Customers; Product Sales and Use:** We have a team dedicated to ensure compliance with trade compliance laws, such as laws prohibiting the sale of our products to certain countries, some of which have poor human rights records. A core purpose of our technology innovation and products is to help keep individuals and businesses secure and protect individuals’ and business’ sensitive data and property. We contractually commit our end-customers in our End-User License Agreement to agree that Fortinet’s products and services cannot be used to engage in, or support in any way, violations or abuses of human rights. And through our Partner Code of Conduct, we set out expectations for our sales partners to respect human rights and labor standards.

• **Our Employees:** We respect the rights of our employees and we’re committed to improving the diversity of our workforce with a strong focus on equity and inclusion. Our Company Code of Conduct outlines some of the employment standards we apply across Fortinet’s business, such as equal opportunity, non-discrimination, and health and safety. We also aim to help build a diverse cybersecurity workforce with our efforts to close the cybersecurity skills gap.

GOVERNANCE

Fortinet’s CSR Committee will periodically review and update this policy, as appropriate, and track and report our human rights performance on an annual basis as part of our Sustainability Report.

Fortinet’s CSR Committee, led by the Global Head of Sustainability & CSR, is responsible for overseeing compliance with Fortinet’s Global Human Rights Policy, updating it, and monitoring its implementation and ensuring it is fully followed throughout Fortinet on a worldwide basis. We
will strive to provide an environment for open engagement and collaboration and will take reasonable steps to investigate any good faith complaints made through Fortinet’s online reporting tool managed by an independent third party, EthicsPoint, at the following link: http://www.ethicspoint.com/, or directly to Fortinet’s legal team at legal@fortinet.com.

The Global Head of Sustainability & CSR will provide periodic updates to the Social Responsibility Committee of the Fortinet, Inc. Board of Directors on Fortinet’s human rights related initiatives.

This policy is signed off by John Whittle, Chief Legal Officer of Fortinet, Inc.