



**FORTINET STATEMENT ON  
CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010 AND UNITED KINGDOM  
MODERN SLAVERY ACT 2015**

The California Transparency in Supply Chains Act of 2010 (SB 657) as well as the United Kingdom Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018 requires manufacturers, who conduct business in certain applicable regions (in California, the United Kingdom and Australia, respectively) and have gross worldwide sales over US\$100 million and/or over £36 million and A\$100 million, respectively, to publish their ongoing efforts to eliminate slavery and human trafficking from their business and their supply chain.

Fortinet is fully committed that its business practices, human resources procedures and the selection of its staff and those with whom it does business are aligned with good faith efforts to combat against slavery and human trafficking.

We are a manufacturer of Network Security Products and relevant services. We provide top-rated network and content security, as well as secure access products that share intelligence and work together to form a cooperative fabric. Our unique security fabric combines Security Processors, an intuitive operating system, and applied threat intelligence to give customers proven security, exceptional performance, and better visibility and control--while providing easier administration. We engage external contract manufacturers in a number of countries around the world to manufacture our products. Manufacturing locations include the United States, Taiwan, Germany and others.

We assess that the risks of modern slavery practices in our operations and supply chains is low, in large measure due to the fact that we are predominately a manufacturer of cybersecurity software programs and associated hardware and services, and based on the policies, procedures and protocols we have established to mitigate against the likelihood of modern slavery in our operations. We do not have ownership in separate entities where the risks of modern slavery are heightened. Additionally, we sell our products through authorized third-party distributors and resellers, and we vet our third parties through the use of sophisticated tools that search for evidence of reported modern slavery issues. Finally, our third-party agreements require compliance with all laws, which includes laws against modern slavery, and our third parties are required to take our annual ethics and compliance training, which includes training on complying with Human Rights as set out by the UN Guiding Principles on Business and Human Rights.

During this reporting period from January 1, 2022 to December 31, 2022, we gained a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At present, we continue to review the effectiveness of measures we have undertaken, and we assess at least annually how our actions impact our risk mitigation efforts. We place all of our direct third parties in high-risk areas into our continual monitoring program, which alerts us if red flags, including modern slavery flags, are evident. We have commenced and will continue to work on developing frameworks and processes to help ensure we can



review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains. We consulted the relevant companies we own or control in the development of this statement.

Fortinet is headquartered in Sunnyvale, California with offices around the world, amongst them in the United Kingdom. Fortinet has over 12,000 employees worldwide.

### 1. Fortinet's Supply Chain Verification

- Fortinet is committed to doing its part to help eliminate human trafficking and slavery from its supply chain. Fortinet requires from its suppliers honest and ethical conduct as a requirement to work with us. Fortinet has no actual knowledge of any unethical behavior by manufacturers related to human trafficking and slavery, and if we had positive knowledge or serious indications of any irregularities in this regards, we would investigate such issues in our supply chain. Fortinet includes terms requiring certain compliance by its suppliers, including requiring suppliers to 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 intend to use due diligence and good faith efforts to investigate and resolve the issue. Fortinet does not routinely engage any third party to conduct independent or unannounced audits of our supply chain for this purpose.

### 3. Fortinet's Direct Supplier Policy

- 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. In such event, we would intend to 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 its discretion to take disciplinary action, including possibly terminating the business relationship with the supplier.

### 4. Fortinet's Accountability Standards, Training and Internal Policies

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




country where the employee is employed. Additionally, employees and managers with direct responsibility for supply chain management receive training on human trafficking and slavery, particularly with respect to mitigating risks within the Fortinet supply chain.

This statement is made pursuant to the California Transparency in Supply Chains Act of 2010 (SB 657) and the United Kingdom’s Modern Slavery Act 2015 as well as Australia’s Modern Slavery Act 2018 and sets out the status of Fortinet, as a group, during the prior calendar year, to prevent modern Slavery and Human Trafficking in Fortinet’s business and supply chain.

This statement was approved by the principal governing body of Fortinet International, Inc. in October 2023.

Signed for and on behalf of Fortinet International, Inc.:

DocuSigned by:  
  
B974EBE571D2496...

**Brian Pollard**  
Director, Fortinet International, Inc. and  
Fortinet Australia Pty Ltd  
October 2023

DocuSigned by:  
  
10/25/2023