



CODE OF BUSINESS CONDUCT

August 18, 2020

One Gigamon Culture

Gigamon's products deliver unified network visibility and analytics on all information-in-transit, from raw packets to apps, across physical, virtual and cloud infrastructure. As a team, we embrace a singular "One Gigamon" culture and in doing so we collaborate as colleagues along with partners and customers to best serve our customers in a productive, team-oriented, ethical and responsible manner. As part of our culture we put "Employees First" as we understand that a company's success is built upon its greatest asset – our employees. By placing our employees first, they are motivated to deliver and outperform, which translates into our customers receiving the best quality products and services we can deliver. It is foundational to our One Gigamon culture that we act with integrity and treat others with respect.

Policy Overview

This Code of Business Conduct flows from our commitment to our One Gigamon culture. We work together to serve our customers with integrity and the highest ethical standards. As such, we believe it is unacceptable to bypass appropriate processes and behaviors by cutting legal or ethical corners for the benefit of Gigamon Inc. or its subsidiaries (collectively, "Gigamon") for any reason.

This code is intended to deter not only actual wrongdoing, but the appearance of wrongdoing or impropriety. Doing (and being seen to do) the right thing is more important than winning, and we will not risk our reputation or the trust of our customers and partners in order to win a deal.

This code is designed to ensure that employees:

- execute business ethically and with integrity;
- avoid apparent or actual conflicts of interest;
- comply with the letter and spirit of all laws and Gigamon policies wherever we transact business; and
- promptly report suspected violations of this code.

To whom does the code apply?

The code applies to all of us: our board of directors, executives, managers, employees and independent contractors of Gigamon and its subsidiaries. In addition to our own compliance, all of us are accountable for ensuring that our subordinates and independent contractors comply with this policy.

Honest and Ethical Conduct

Consistent with our core values, Gigamon personnel must act and perform their duties ethically, honestly and with integrity - doing the right thing even when "no one is looking." We make and keep commitments – we do not bypass or avoid policies and procedures. No 'wink of an eye' or 'nod of the head'.

Conflicts of Interest

A conflict of interest may exist where the interests or benefits of one person or entity conflict or appear to conflict with the interests or benefits of Gigamon. Your decisions and actions related to Gigamon should be based on the best interests of Gigamon and not based on personal relationships or benefits, either for yourself or for others. Gigamon personnel must never use or attempt to use their position with Gigamon to obtain improper benefits for themselves or a third party.

A conflict of interest may arise in many situations. While we cannot list them all, some examples include:

- serving as a director, employee or contractor for a company that has a business relationship with Gigamon or is a competitor of Gigamon;
- having a financial interest in a competitor, supplier or customer of Gigamon, other than holding a direct interest of less than 1% in the stock of a publicly traded company or holding a widely traded mutual fund that owns stock in a publicly traded company;
- receiving something of value from a supplier, vendor, customer, channel partner or competitor of Gigamon beyond modest entertainment or nominal gifts in the ordinary course of business, such as appropriate meals, entertainment, travel reimbursement, gifts and/or logo wear in accordance with Gigamon's Global Travel & Expense Policy; or
- directly or indirectly using for personal gain, rather than for the benefit of Gigamon, a business opportunity that relates to Gigamon's business and that became available to you through your role with Gigamon.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. We encourage you to seek guidance from the Chief Financial Officer or General Counsel when you have any questions or doubts, and before entering into any arrangement that you think may present a conflict of interest.

Compliance

Gigamon strives to comply with all applicable laws and regulations. It is your personal responsibility to adhere to the standards and restrictions imposed by all applicable laws and regulations. The same applies to policies we adopt, and, even if conduct complies with the letter of the law or our policies, we must avoid conduct that will have an adverse impact on the trust and confidence of our customers, partners or investors.

For example, regardless of local practices or actions by competitors, you must never directly or indirectly make a payment (cash or any other items of value) to a foreign official or government employee to obtain or retain business for Gigamon, or to acquire any improper advantage. You must fully comply with all anti-corruption laws of the countries in which we do business. For more information, please review our Gigamon Anti-Corruption Policy.

Reported violations of this code will be investigated and appropriate action taken, up to and including termination of employment and legal proceedings.

Reporting

If you have a concern regarding conduct that you believe may be a violation of a law, regulation or Gigamon policy, or you simply are unsure whether a situation violates any applicable law, regulation or Gigamon policy, please:

- discuss the situation with your manager, HR representative, or the General Counsel or Chief Financial Officer.
- if you don't believe your concern is being adequately addressed, or you are not comfortable speaking with the above-noted contacts, or you believe you are potentially the subject of retaliation for good-faith reporting of a concern, please report your concern through ethics@gigamon.com.
- If you wish to report a concern anonymously, you should send a post/mail letter to the attention of our General Counsel, 3300 Olcott Street, Santa Clara, CA, 95054. In any anonymous report, please include as much detail as possible so that we can best investigate your concern.

We expect our employees to do their best to comply with this policy. Do not stay silent in the face of a potential violation. A manager is required to report up to his or her manager (or to the General Counsel or CFO) any information that he or she becomes aware of regarding a potential violation. If you have knowledge of a potential violation and fail to report it via the process set forth above, you too may be subject to disciplinary action under this code.

No Retaliation

Gigamon will not retaliate against (or permit a manager to retaliate against) any individual for filing a good-faith concern regarding non-compliance with this policy or for participating in the investigation of any such complaint.

Waivers and Amendments of this Code

Any amendment or waiver of any provision of this Code of Conduct must be approved in writing by the Board of Directors or, if appropriate, its delegate(s). We are committed to continuously reviewing and updating our policies. We therefore may amend this code at any time and for any reason.