



EXPORT & SANCTIONS COMPLIANCE POLICY

August 1, 2025

Gigamon (the Company) and its management are committed to conducting all of the Company's operations around the world in a manner consistent with the Gigamon Code of Business Conduct and in compliance with all applicable laws.

Gigamon products may not be exported or re-exported to sanctioned jurisdictions nor delivered to individuals or entities listed as under restrictions by the U.S. and EU governments or other applicable jurisdictions.

Gigamon products, software, and technology (Gigamon products) are subject to export controls and sanctions under the laws and regulations of the United States (U.S.), the European Union (EU), and any other applicable countries' export laws and regulations. Export, re-export, transfer, and use of Gigamon products may require obtaining U.S., EU and local authorizations, permits, or licenses.

Certain of Gigamon's products are controlled under the [U.S. Export Administration Regulations](#), [EU Dual-Use Regulation](#) (Regulation (EU) 2021/821) as information security equipment in category 5, part 2. The classification of Gigamon's products and CCATS rulings are available upon request to exportcompliance@gigamon.com.

As a U.S. company, Gigamon is obliged to comply with [U.S. anti-boycott laws](#) and refuse to participate in foreign boycotts that the United States does not sanction. As a Dutch company, Gigamon B.V. is obliged to comply with [EU Blocking Regulation](#) (Council Regulation (EC) 2271/96) and refuse to participate in foreign boycotts that the EU does not sanction and are included in the Annex to the EU Blocking Regulation.

Failure to comply with applicable export control or sanctions laws can subject Gigamon, its employees, and other involved parties to severe monetary penalties, loss of export privileges, forfeiture of products, reputational harm and potential criminal prosecution. Employees violating such laws are subject to appropriate discipline, including the possibility of termination.

For more information on Company responsibilities, please refer to the Appendix attached hereto.

APPENDIX

1. Compliance Organization

1.1. Responsibilities

The Company's applicable legal and logistics personnel (Export Compliance Personnel) assess the Company's compliance with all applicable laws and regulations concerning the export of goods, services and technology.

1.1.1. Duties of Export Compliance Personnel

The Company Legal Department personnel (Legal Personnel) are responsible for legal assessment regarding compliance in export and sanctions laws and supervise export related activities of the Company.

The Legal Personnel also assist the other Export Compliance Personnel in their evaluation and dischargement of duties, including the following activities.

- Sanctions and export control risk assessment. The risk assessment is reviewed and revised, if appropriate, at least annually.
- Classifying the Company's goods and evaluating whether they fall under relevant export control frameworks, such as the U.S. Export Administration Regulations and the EU Dual-Use Regulation.
- Monitoring relevant developments in the legal framework of export control and sanction regimes, including when the Company makes significant changes to its business activities.
- Conducting pre-export checks, such as reviewing sanctions lists and organizing the collection of end-use declarations by customers.
- Obtaining export authorizations by authorities, if needed, and submitting the necessary export declarations to the competent customs authorities.
- Trainings relevant employees and conducting internal audits of all relevant export control processes.

Export Compliance Personnel have the power to suspend an export transaction if it does not comply with the applicable export control regulations. In executing this power, they must act independently of the company's economic interests and are

obliged to intervene immediately in the event of a possible breach of applicable export control or sanctions laws.

To fulfil their role sufficiently and effectively, Export Compliance Personnel must not assume any tasks or functions that conflict with export control objectives, in particular no operational responsibility in sales.

When assessing difficult matters, non-Legal Department Export Compliance Personnel shall consult with the Legal Personnel.

At any time, a member of the Export Compliance Personnel is available to carry out export compliance responsibilities.

1.2. Risk Assessment

The Company's risks under applicable export control and sanctions laws are moderate:

- Certain of Gigamon's products can be used for both civilian and military purposes. Nevertheless, (only) a few of them are controlled under the U.S. Export Administration Regulations, the EU Dual-Use Regulation, and Wassenaar Arrangement as information security equipment in category 5, part 2. However, under EU and U.S. export control laws, several general licenses are available for shipping to a broad range of countries.
- Also, none of Gigamon's products are currently considered military grade goods controlled under ITAR or an equivalent control regime under EU Member States' laws.
- Regarding risks emanating from U.S. and EU sanctions laws related to goods and services, the Company does not sell or export goods to or for use in countries as a matter of principle if sanctions established by the U.S. or the EU cover physical and virtual network visibility technologies. Hence, the risk of violations is reduced. In the event that a transaction should exceptionally involve a listed entity and/or a sanctioned destination, the Company does not conclude or go through with that transaction, unless
 - (i) it has obtained a license from the respective competent authorities if required for the sale and/or export in question, or
 - (ii) the Legal Personnel have confirmed that an exemption applies to the transaction in question under the applicable sanctions framework.
- Lastly, risks of violating restrictions on the making available of economic resources to legal and natural persons that are OFAC-listed or listed in

comparable EU sanctions regulations exist in a limited manner as Gigamon to a large extent sells and exports its equipment to vetted distributors.

1.3. Processes

The Company ensures that all its business activities are continuously conducted in compliance with the respective applicable export control and sanctions regulations. The Company is aware that this not only applies to sales and the export of goods, services and technology, but also to other business activities, such as its own procurement processes or the hiring of new employees.

The Company ensures that relevant information which is gathered in different departments of the Company is made available to the Export Compliance Personnel to enable them to conduct a thorough assessment. Appropriate information flows are established within the Company.

1.3.1. Exports

For each export transaction (regardless of being through sales or free of charge, e.g. as part of servicing), it is necessary to examine which goods are involved, to which country of destination they are to be exported, and, if applicable, the intended end-use. As a matter of principle, the Company does not sell or export goods to or for use in countries that are prohibited by U.S. or EU sanctions from receiving physical or virtual network visibility technologies. If the Company, in exceptional situations, intends to sell or export goods to listed entities or sanctioned destinations, the Company does not conclude or go through with that transaction, unless

- (i) it has obtained a license from the respective competent authorities if required for the sale and/or export in question, or
- (ii) the Legal Personnel have confirmed that an exemption applies to the transaction in question under the applicable sanctions framework.

The Company, and in particular the Export Compliance Personnel, must be alert to 'red flags' in the course of export activities. These indicate that a transaction might not be in compliance with the applicable export and sanctions regulations and thus pose a high risk.

To be in compliance with export control regulations and provisions, the Company carries out any sales and export activities in compliance with applicable regulations and provisions. The Company obtains authorization by competent authorities, if such authorization is required under applicable export control or sanctions law.

An export control assessment is especially required when the goods in question are considered a dual-use item under the applicable jurisdiction(s). To this effect, the Export Compliance Personnel undertake to correctly classify the Company's goods, services or technology. In particular, they must assess whether the goods in question are considered a dual-use item under the applicable jurisdiction(s) before exporting them.

To facilitate such assessment prior to sales and export activities, the Company classifies its goods with the involvement of the Export Compliance Personnel and external counsel. It creates a collection of material master data and updates its collection of such data when needed, for instance, when developing new technology. In case of doubt about a classification, the Company will seek clarification from the competent authorities or through external counsel.

1.3.1.1. Export of Listed Dual-Use Goods

If the evaluation concludes that a dual-use good is involved, the Export Compliance Personnel initiate the appropriate authorization process to obtain the necessary official authorization by authorities. Once authorization by authorities has been granted, the Company releases the good in question.

1.3.1.2. Export of Non-Listed Dual-Use Goods

The Company is conscious of the possibility of customers using a good, which is not listed in relevant legal provisions as a dual-use good, for purposes inconsistent with their original design and intended use. This includes, inter alia, activities to support weapons of mass destruction or other unauthorized uses defined by the applicable foreign trade laws (in particular: Art. 4 para 1 of the EU Dual-Use Regulation) ('Critical End-Use').

If the Company is instructed by competent authorities of Critical End-Use of a (potential) direct or indirect customer, the export procedure is to be stopped and submitted to the Export Compliance Personnel. They will decide if and under which preconditions the export can be conducted and will be in charge of all necessary communication with the authorities.

When applicable, the Company carries out its own assessment, regardless of any information provided by the authorities. For potential Critical End-Use, the Company assesses relevant information, including any 'red flags'.

If the assessment reveals Critical End-Use, any such export transactions will be temporarily put on hold and the Export Compliance Personnel must notify the

competent authorities and seek further guidance and authorization prior to proceeding with the transaction.

1.3.1.3. Further Compliance and Assessments

The Company checks and adheres to applicable sanctions lists for the destination of goods and other provisions to prevent its export activities from constituting direct or indirect circumventions of sanctions. The Company may not engage in any activities that directly or indirectly result in goods ultimately being exported to and made available in countries in violation of applicable sanctions.

In this regard, the Company pays due consideration to the applicable framework with regard to export activities to the Russian Federation and Belarus.

With a view to enhanced trade compliance requirements to prevent circumvention of certain products under the Russian and Belarus sanctions regime, the Company has established corresponding enhanced due diligence processes and trade compliance documentation in relevant cases. For applicable transactions, the Company conducts 'red flag-checks' and risk assessments for the respective transactions. To check whether all categories of characteristics have been taken into account, guidance can be provided by the [EU's corresponding FAQ](#). In order to conduct a comprehensive assessment, the Export Compliance Personnel make use of all applicable information.

If the Export Compliance Personnel reach the conclusion that the export activity in question is likely to violate such regulations, the export transaction shall be put on hold until these doubts are sufficiently resolved.

The Company also screens its direct and – if known – indirect customers, end-users, suppliers and other relevant parties, including both natural and legal persons, and examines whether they are subject to sanctions. If a screening should contain a hit, the process is forwarded to Legal Personnel for review to determine whether the process can be executed.

1.3.2. Human Resources

The Company conducts its own screenings for new employees; in line with the respectively applicable data protection regulations. These screenings include, inter alia, whether the person concerned appears on any sanctions lists.

1.3.3. Research & Development

The Company regularly updates its list of goods and correspondingly updates its list of data with a view to the classification of goods as dual-use items and any listing on U.S. or EU sanctions regulations.

1.3.4. After Sales

The Company does not permit technical assistance or knowledge transfers that are forbidden by applicable export laws and regulations. Prior to any such action, the Company conducts a screening of the respective customer, the country of destination and, when applicable, the intended end-use. If the assessment reveals 'red flags' or concludes that Critical End-Use is forbidden or requires a prior license, the transfer of technical assistance must be temporarily halted by the Export Compliance Personnel. They will decide if and under which preconditions the technical assistance can be carried out. In order to conduct a comprehensive assessment, the Export Compliance Personnel make use of all applicable information.

The Export Compliance Personnel seek authorization by authorities in such scenarios. If authorization by competent authorities is necessary, technical assistance will be only executed after obtaining such authorization.

If the Company is instructed by competent authorities of Critical End-Use, the transfer of technical assistance is to be stopped and the process to be submitted to the Export Compliance Personnel. They will decide if and under which preconditions the technical assistance may be carried out.

1.4. Physical and Technical Safety

The Company protects its goods and technology against removal or unauthorized disclosure by employees or third parties. To this end, the Company deploys appropriate security systems based on its own structures and needs.

The Company employs measures to protect its software and technology against unauthorized access. To this end, it uses password-protected systems, firewalls and controls storage media and servers. The Company uses reasonable measures to prevent third parties from gaining unauthorized access to the technologies during their transfer to customers.

The Company's physical security standards do not only encompass standards at warehouses and at expeditors, but they also cover standards for the shipping process. The Company limits the accessibility of warehouses and other sites and installs

surveillance and other security devices. During shipping, the Company deploys, inter alia, security seals and uses, if deemed necessary, GPS tracking.

1.5. Documentation

All export control processes, starting with the initial assessment by the Company itself, through the application process for the relevant authorization by authorities, to the completion of the process after authorization, must be documented in a traceable and transparent manner.

The Company maintains the following information: who conducted the assessment and when, what decision was taken on which legal basis, information relating to the authorization process, and what was the outcome of the authorization process.

The Company maintains all relevant documents, either physically or electronically, and will present such documentation upon request by authorities. The Company complies with the respective deadlines for keeping the relevant documents.

1.6. Training and Audits

1.6.1. Trainings

All applicable employees receive internal or external training at regular intervals. Trainings will be conducted at least annually. Participation in trainings is mandatory and will be documented.

Members of Export Compliance Personnel and other employees that are involved in the decision-making process for export controls and thus exposed to a high risk, will receive external trainings. For other employees who have a lower exposure risk, in-house training is sufficient according to their specific needs and risk exposure. New employees involved in export-related activities will receive appropriate training.

If the Export Compliance Personnel or others become aware of significant changes at short notice that significantly affect the Company and its export activities, the Company ensures that trainings are made available in due time.

1.6.2. Audits

The Company conducts audits relating to this Compliance Policy in regular intervals. The Company will conduct regular internal audits annually and ad hoc if necessary. The Company ensures that, in the event of identified errors or weaknesses, appropriate corrective measures are taken.

2. Further Information

The U.S. Commerce Department Bureau of Industry and Security website provides U.S. export guidance at <https://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl>.

The U.S. Office of Foreign Assets Control website provides U.S. sanctions guidance at <https://ofac.treasury.gov/sanctions-programs-and-country-information>.

Non-U.S. and U.S. companies re-exporting Gigamon products or technology must comply with both their local export regulations and with the U.S. re-export regulations. Guidance regarding re-exports and other offshore transactions involving U.S. origin items can be found at <https://www.bis.doc.gov/index.php/licensing/reexports-and-offshore-transactions>.

The European Commission provides information about EU export control laws at <https://ec.europa.eu/trade/import-and-export-rules/export-from-eu/dual-use-controls/>.

Further guidance published by the Netherlands EU member state can be found at: [Netherlands Export Controls](#).

3. Reporting

To report a compliance concern involving Gigamon or its products, please contact exportcompliance@gigamon.com.