



WHISTLEBLOWER POLICY

June 25, 2024

I. Policy Description

Gigamon Inc. (“**Gigamon**”) is committed to maintaining high standards of integrity and takes very seriously all complaints and concerns regarding business ethics, accounting, internal accounting controls, auditing and other legal matters. This Whistleblower Policy (“**Policy**”) applies to Gigamon and each of its subsidiaries and its employees, officers, directors and certain contractors and consultants. We are all responsible for being familiar with the Code of Business Conduct (the “**Code**”) found at <https://www.gigamon.com/content/dam/resource-library/english/user---support-documentation/ms-gigamon-code-of-business-conduct.pdf>, seeking guidance, and raising concerns. Our policy is to conduct our affairs honestly and ethically in all of our worldwide operations and locations. Our corporate integrity and reputation depend upon the honesty and integrity you bring to Gigamon. Your personal integrity is the foundation of our corporate integrity.

Any employee who does not comply with the Code, other company policy, applicable law or fails to cooperate fully in the investigation of an alleged violation is subject to disciplinary action up to and including termination of employment. Gigamon takes allegations of observed or suspected violations of company policy seriously and conducts prompt investigations.

II. Reporting Responsibility

It is the responsibility of all directors, officers, and employees to comply with the Code and to report violations or suspected violations in accordance with this Policy.

Managers have an even greater level of responsibility and must lead with integrity and reinforce Gigamon’s ethical culture. They are often the first resource for employees who have questions on ethical issues or potential violations of Company policy. They may be held responsible for their failure to report misconduct or to take steps to address or remediate an issue.

III. Anti-Retaliation

Gigamon will not tolerate retaliation against anyone for raising concerns in good faith regarding an actual or suspected violation of our Code, company policy, or the law. Good faith is raising a question or concern that you honestly believe to be true. We also strictly prohibit any intimidation or retaliation against anyone who assists with any inquiry or investigation of any such violation. Anyone engaging in retaliation against an employee who reports misconduct is in violation of the Code and may face disciplinary action, up to and including termination.

IV. Accounting and Financial Audit Reporting

The Chief Financial Officer and General Counsel shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. Upon notification of any such complaint the Chief

Financial Officer and General Counsel will work together to investigate, appropriately resolve the matter and report to the board of directors as necessary.

V. Reporting Procedure

A. Gigamon’s policy suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's manager is in the best position to address an area of concern. However, if you are not comfortable speaking with your manager or you are not satisfied with your manager's response, you are encouraged to pursue one of the other following channels:

- Anyone else in management whom you are comfortable approaching
- Human Resources Department
- Legal Department

B. Employees and non-employees may also report a complaint on a confidential and anonymous basis by using the company's Ethics Hotline:

Website: gigamon.ethicspoint.com
Mobile: gigamonmobile.ethicspoint.com
Hotline: 1-844-787-0219
Email: generalcounsel@gigamon.com

Mobile QR Code:



We will exercise discretion regarding the disclosure of sources of information we receive to the extent legally permissible.

C. While this Policy is intended to protect employees acting in good faith from any unfair treatment as a result of reporting, misuse of this protection by making meritless complaints with bad intentions is strictly prohibited. Making a report that is willfully and intentionally false can be the basis for disciplinary action, including termination of employment.

D. Gigamon endeavors to operate on a highly transparent basis, and we want to be made aware of alleged wrongdoings and to address them as soon as possible. However, nothing in this Policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state statute has occurred.

VI. Receipt and Treatment of Complaint

A representative of the Legal or HR departments will promptly notify the sender and acknowledge receipt of the reported violation. Reports of suspected misconduct will be appropriately investigated and treated confidentially to the extent reasonable in light of Gigamon’s need to conduct an investigation and follow up on any concerns.

You should not conduct your own investigation, but you may be asked to assist with an investigation. In such cases you are expected to cooperate and not interfere with the investigation, offer false information, or alter or

destroy records. We are all obliged to cooperate with investigations and provide complete, accurate and truthful information whenever asked to do so.

We treat all parties involved in an investigation--including subjects, reporters and witnesses-- fairly and respectfully, and we let the facts produced by the investigation determine what if any remediation steps should be taken. The person who raised the concern will be informed when the investigation is concluded, and appropriate details will be shared. Some results may remain confidential depending on the nature of information.

VII. Retention of Records

Reports of violations or suspected violations will be kept confidential to the extent reasonable - including for the retention of records, consistent with the need to conduct an adequate investigation. Creating and maintaining accurate and complete data is essential for our ability to meet our business needs as well as legal and regulatory requirements. We retain business records in accordance with the law, to the extent needed for business purposes, or longer if required by tax, regulatory, or other standards. Documents required for an audit, investigation, or other legal action should be retained pursuant to laws and other legal or contractual requirements and pursuant to company policies and procedures.