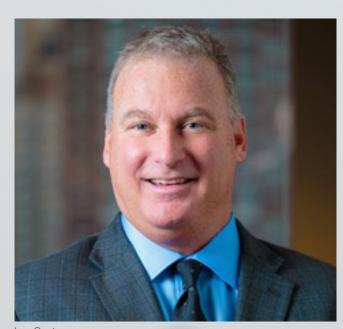


# Our commitment to responsible governance policies and practices

As a leading authority on internet phenomena, Sandvine provides a comprehensive suite of application and network intelligence solutions to service providers, enterprises, and governments around the world. Our high value automation software modules deliver superior customer application experiences, return on investment and loyalty. By getting ahead of market and technology trends, investing in innovation and operational excellence, and listening to our customers, we design solutions that exceed their expectations and propel our growth.

In support of our core values, we take full ownership of our responsibilities, work collaboratively inside and outside the company to make our customers successful, and cultivate a welcoming atmosphere with equality, inclusion and dignity for all.

We believe that our impact on the environment, how we manage our relationships with associates, customers and the communities where we operate, and the governance of these issues are critically important to our business. Our company has undertaken a number of environmental, social and governance (ESG) initiatives, including strategies to increase employee diversity, ensure a respectful workplace and connect with our communities. We believe this commitment is an important part of creating long-term business value.



Lyn Cantor
Sandvine CEO

Jundon Cantor



# Environmental Sustainability

Sandvine is committed to complying with all applicable laws and regulations related to our business, including environmental laws.

We maintain an Environmental Management System (ISO 14001:2015) along with relevant policies, including an Environmental Policy. Our Environmental Management System has been certified since March 2008 and is designed to ensure management, employees, and other parties fulfill their obligation to the environment, and make environmentally responsible decisions. The System and associated processes are designed to manage environmental risks and are updated as necessary.



Our Environmental Policy details our commitment to protecting the environment. We do this by minimizing our contribution to pollution and waste, and maximizing efficient use of resources to improve energy efficiency at our operations. We have also developed management processes to ensure effective implementation of this policy.

A commitment to recycling is one aspect of our policy, and we have developed recycling program guidelines for our company to follow along with stated objectives. Another example is our commitment to continuously find ways to reduce our carbon footprint and conserve energy. For example, Sandvine has developed an idling policy that encourages employees to reduce greenhouse gas emissions by being idle-free (i.e., avoiding idling cars for more than two minutes).



# Social Responsibility

We believe our focus on people, customers and communities is not only important for creating a strong corporate culture, but also contributes to long-term business value creation.

### **OUR PEOPLE**

We believe our people are our greatest asset and we strive to foster a collaborative, productive and rewarding work environment. We have over 800 employees and contractors in 46 countries, and we seek to enhance our culture by focusing on our commitment to associate engagement.

Diversity, Equity and Inclusion: We are committed to creating a workplace that values differences and includes everyone. We actively foster diversity and increasing female representation in our Company. For example, we set targets for 2021 of increasing our global female representation and are focused on reaching a more diverse, broader talent base through various hiring efforts. We report to our Board of Directors on our progress in increasing gender diversity, and will continue to implement strategies to support this goal going forward.

Employee Engagement: We encourage dialogue and solicit feedback from our associates through a variety of means including touch points between supervisors and associates, exit interviews, flash and engagement surveys, and town halls. We also seek to invest in the ongoing development of our associates, including our plan to offer leadership development training in the near future.

Compensation and Benefits: Our compensation and benefits package is designed to attract, motivate, reward and retain top talent to drive our strategic objectives and business results. We offer our associates a wide range of benefits to help take care of themselves and their dependents. In many of our locations, we offer top-tier associate benefits to provide for life's unplanned events and to help ensure a secure financial future (health, welfare, retirement and leave).



### **COMMUNITY ENGAGEMENT**

Sandvine is committed to supporting our communities and gives back through philanthropic contributions and volunteer efforts.

As one example, we are very proud of our longstanding partnership with Shanti Bhavan in India. Shanti Bhavan is a residential school for children from the ages of 4 until 18, established to serve India's poorest families. The school's goal is to help children succeed by providing excellent educational and residential care, providing not only academic instruction but also shelter, food, medical care, clothing and community support.

Since 2016, we have committed financial and volunteer resources to this inspirational program, which measures its impact by how students perform multiple years after completing the program. To date, graduates have achieved honors, attended the best universities in Bangalore, and obtained employment opportunities in multinational corporations.

Sandvine also engages in other community engagement and charitable efforts in the various jurisdictions in which we operate.

For example, in Canada, our team formed a Social Committee and has volunteered for local park clean-ups and back-to-school supply donations. Our team also participated in local food banks and food item collections for Thanksgiving, and sponsored the Big Red Ride for Heart and Stroke Foundation, as well as other community engagement programs.

In Sweden, our associates volunteered to produce and sell bracelets for the cancer unit of a local hospital. We consider our communities to be important stakeholders in our business and always aim to give back.

#### PANDEMIC RESPONSE

The COVID-19 worldwide pandemic affected not only network usage around the world, but also people. One of Sandvine's most important values is protecting the health and safety of our people, so we are proud to have been quick to react to the pandemic. To help ensure the safety of our associates and their families while continuing to serve our customers, we took the following specific actions:

- In February 2020, we restricted business travel and developed an executive task force to guide our response to the emerging pandemic;
- We required associates in all locations to work from home with the exception of a limited number of people with business-critical tasks who were allowed into the office and with strict safety protocols in place;
- We prepared weekly company-wide communications for the initial six months of the pandemic to share business updates and maintain our culture of fostering well-being;
- We cautiously managed our return to office process in accordance with guidance provided by local governments and healthcare organizations;
- We supported our people with uninterrupted salary, benefits and wellbeing programs and, where possible, enhanced benefits to cover COVID issues including family coverage;
- We prepared our facilities and physical workspaces for the new environment by redesigning locations in order to implement multiple protective measures;
- With the further outbreak of COVID-19 in India in 2021, we partnered with external organizations to implement a COVID-19 outreach program which supported over 1,000 men, women and children by providing food, vaccines, oxygen tanks and generators, and other essentials.

### DATA PRIVACY AND SECURITY

We consider protecting personal data a societal matter, not just a governance matter. Sandvine's associates, individual contractors, customers, business partners, suppliers and vendors, among others, provide us with personal information in the course of doing business and we maintain mechanisms to protect this information. Access to this information is provided utilizing the principle of least privilege, and access is only for legitimate business purposes. We are committed to complying with laws and regulation governing the collection and use of personal data, and are continually working to mature our systems to align with the changing privacy regulatory landscape.

We prioritize cybersecurity and have instituted governance mechanisms including policies, procedures, and systems designed to safeguard our network and data. As part of our Vulnerability and Risk Management processes, we regularly review our cybersecurity risks and are developing mitigation and remediation strategies to address any potential gaps or issues. We engage external advisors who assist us in strengthening our practices around cybersecurity, and we thoroughly assess third party vendors (who meet certain criteria) for compliance with applicable security standards. Our Information Security Management System (ISMS) policies and procedures are

reviewed and updated (if required), and communicated on an annual basis by our Governance, Risk, and Compliance team in cooperation with other stakeholders as needed. Sandvine's ISMS is in compliance with and has been successfully ISO 27001:2013 certified since 2017. Our associates and contractors are mandated to complete training related to cybersecurity and compliance with data privacy and security policies.

In addition to our Privacy Policy, we maintain a Business Continuity Plan that defines how Sandvine will manage activities during a business continuity event. The Plan, communicated to all associates, is designed to protect our people and visitors, prevent worsening of an event, set forth expectations on communications to clients and other interested parties about incidents and events, and plan for the restoration and resumption of business activities.

## **HUMAN RIGHTS/FREEDOM OF EXPRESSION**

We are committed to ensuring that our application and network intelligence solutions are not misused to prevent the free flow of information or to interfere with democratic processes. Our solutions are central to ensuring reliable and secure internet service. These solutions include blocking and filtering technology to protect networks and subscribers every day from billions of malicious internet transactions linked to illicit and illegal activities such as child pornography, human trafficking, terrorism and the spread of malware. These solutions are not intended to block the free flow of information or thwart human rights. Rather, they are designed to achieve the opposite by clearing the way for individuals to receive access to information without the impediment of illicit or illegal content.

To mitigate future risks, our Business Ethics Committee is tasked with the evaluation of potential sales of Sandvine solutions so we can promote the ethical and responsible use of application and network intelligence in all spheres of the world. In deciding where to sell, or not to sell, our products and services, the Business Ethics Committee will, among other things, consider:

- Whether a potential customer is located in a country that is committed to free internet access;
- The human rights record of the country in which a proposed customer is located or operating;
- Whether the country in which a potential customer is located or operating is subject to economic sanctions or trade restrictions imposed by the United States, Canada or other relevant government authorities; and
- Whether a potential customer is subject to sanctions or trade restrictions imposed by the United States, Canada, or other relevant government authorities.

We encourage associates and interested third parties to report any suspected misuse of our traffic management products to an email address publicly available on our website.

# Proactive Governance

We have adopted various codes, policies and statements to help us govern our behavior including in support of our ESG commitment. These codes and policies set forth our standards of business and expectations for our company.

We prioritize governance mechanisms including policies and procedures around our most material ESG issues. Our key governance document is our Code of Conduct and Ethics which communicates our standards of business conduct throughout Sandvine, and guides our actions. With respect to ESG, it addresses privacy, supply chain, modern slavery and human trafficking, environmental responsibility and the mechanism for reporting possible violations, including an anonymous hotline.

We also maintain an Associate Handbook that has several ESG-related policies depending on location, including a whistleblower hotline operated by an independent firm and kept confidential. Our Handbook also has policies prohibiting harassment and discrimination, as well as ensuring data protection, and safety. We also maintain various substantive policies such as our Environmental Policy.

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# **ABOUT SANDVINE**

Sandvine's cloud-based Application and Network Intelligence portfolio helps customers deliver high quality, optimized experiences to consumers and enterprises. Customers use our solutions to analyze, optimize, and monetize application experiences using contextual machine learning-based insights and real-time actions. Market-leading classification of more than 95% of traffic across mobile and fixed networks by user, application, device, and location creates uniquely rich, real-time data that significantly enhances interactions between users and applications and drives revenues. For more information visit http://www.sandvine.com or follow Sandvine on Twitter @Sandvine.



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