

The UK Modern Slavery Act 2015 requires that any commercial organization in any sector, which supplies goods or services, carries on a business or part of a business in the UK, and is above a specified total turnover must produce a slavery and human trafficking transparency statement for each financial year of the organization. The transparency statement must include the steps the organization has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

The California Transparency in Supply Chains Act of 2010 requires every retail seller and manufacturer doing business in California and having annual worldwide gross receipts above a specified amount to disclose its efforts to eradicate slavery and human trafficking from its direct supply chain for tangible goods offered for sale.

Silver Peak Systems, Inc. and its subsidiaries (“Silver Peak,” “we” or “our”) are opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor and all other trafficking-related activities. We are committed to (i) fully complying with all applicable labor and employment laws, rules and regulations, and (ii) working to mitigate the risk of human trafficking in our business and supply chains. This Transparency Statement is provided to comply with the UK Modern Slavery Act and the California Transparency in Supply Chains Act.

Silver Peak Systems, Inc. is a Delaware corporation with subsidiaries worldwide that focuses exclusively on wide area networks (WANs), specializing in connecting users securely and directly to business applications. Silver Peak’s Unity EdgeConnect™ SD-WAN edge platform unifies SD-WAN, firewall, segmentation, routing, WAN optimization and application visibility and control in a single, centrally managed, system. Silver Peak supports thousands of customers worldwide, including more than 1,500 production customer deployments of its EdgeConnect SD-WAN edge platform. Its customer base includes a broad range of industries.

Silver Peak conducts all business through distributors and value-added resellers, systems integrators, or service provider partners spanning more than 80 countries around the world. Silver Peak also leverages a broad technology alliance ecosystem, including networking, security and cloud companies, to extend the value of the EdgeConnect platform. Silver Peak sources its hardware components from reputable original equipment manufacturers, and its products are built, tested, configured and loaded with Silver Peak’s proprietary software by a qualified contract manufacturer located in the U.S and Taiwan.

Silver Peak’s anti-slavery efforts require collaboration with its supply chain partners and its global channel of distributor, reseller, systems integrator and service provider partners that distribute and sell Silver Peak products. Its philosophy is to work with suppliers and partners that agree to maintain ethical supply chain processes, programs, policies and practices to mitigate the risk of modern slavery occurring within their direct and indirect supply chains.

Silver Peak’s Code of Business Conduct and Ethics (the “Code of Conduct”) is provided to all new hires and requires compliance by Silver Peak’s employees and agents with applicable

laws, rules and regulations, including laws and regulations relating to occupational health and safety and anti-bribery. The Code of Conduct includes reporting procedures and accountability provisions, and provides for protection against retaliation for those making a report. If Silver Peak becomes aware of a violation of the Code of Conduct, Silver Peak will reasonably investigate the matter and take appropriate action, including cooperating fully with appropriate authorities. Anyone who violates the Code of Conduct could be subject to criminal or civil penalties and/or be subject to corrective action up to and including discharge from Silver Peak. Silver Peak's Employee Handbook also contains provisions regarding health and safety and workplace security/violence.

Silver Peak does not engage in verification of product supply chains to evaluate and address risks of human trafficking and slavery and does not audit suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains; however, Silver Peak (i) partners with manufacturers that are located in countries with strong anti-slavery and human trafficking laws, (ii) employs a supplier qualification survey that requires suppliers to confirm that they have established ethical supply chain processes, and (iii) employs a partner qualification survey that requires partners to describe their responsible business practices and supplier requirements. Silver Peak will not continue to purchase goods or services from any supplier that is found to be engaging in slavery or human trafficking.

Silver Peak's standard form of Master Services Agreement obligates suppliers to observe the Code of Conduct, including the provisions regarding compliance with laws, rules and regulations. Silver Peak's parent entity, Silver Peak Systems, Inc., is the contracting party for all Master Services Agreements.

In connection with onboarding and every two years thereafter, all employees receive Harassment Prevention Training, and Silver Peak also provides a one-time Safety and Security Training to all employees, which addresses, among other topics, general safety rules and emergency action plans; Silver Peak does not, however, provide training to employees and management that specifically addresses human trafficking and slavery.

SIGNATURE

The company has duly caused this Transparency Statement to be signed on its behalf by the undersigned director.

Silver Peak Systems, Inc.

Date: November 25, 2019

/s/ David Hughes

David Hughes
Chief Executive Officer and Chairman of the Board