

## **FireEye-Mandiant Corporate Responsibility Statement**

We believe that corporate citizenship and sustainable business practices go hand-in-hand with our mission to protect our customers from cyber threats. As an innovator and leader in the cybersecurity industry, we recognize that everything we do has an effect on the global economy, society, and the environment. Corporate citizenship, sustainability and diversity are embedded in our corporate values, which in turn define our corporate culture and guide decision-making at all levels within our organization.

Consistent with our values, we are constantly seeking new ways, both large and small, to engage our employees and improve our performance on environmental and social issues. We focus our efforts on:

- Enabling a safer cyber environment for our employees, our customers, and the global cyber community;
- Creating a diverse and inclusive corporate culture and workforce with high levels of engagement and a commitment to excellence; and
- Promoting responsible global citizenship.

### **Enabling a Safer Cyber Environment**

As we live connected and technology becomes more deeply entwined with our most basic human activities, the impact of cyberattacks will continue to grow. Without a coordinated global response, there are few risks or repercussions for attackers. Annual losses due to ransomware and other attacks are in the billions, and recent cyber attacks on hospitals, democratic elections around the world, and U.S. government institutions demonstrate the destructive potential of unchecked cybercrime and espionage.

We believe we must address the security gap between attackers and their targets before the consequences become so dire that we begin to mistrust the very technology that vastly improves our lives. When we empower organizations to protect themselves — with our threat intelligence, our expertise, and our technology — we become a partner in progress toward greater global equality and a more sustainable future. This is our mission and the cause that inspires us daily.

We achieve our mission by:

- Collecting, producing, and leveraging the best threat intelligence on a global scale;
- Making our knowledge and expertise readily available to the global cyber community through our Mandiant Advantage platform;

- Innovating continually to deliver agile technologies that adapt and respond to rapidly changing threats;
- Addressing the shortage of cybersecurity talent by recruiting and training the professionals who join us on the front lines of the cyber battlefield;
- Collaborating with law enforcement and governments to increase the risks and repercussions to attackers; and
- Being the cybersecurity experts that the experts turn to in times of complexity or duress.

When our customers depend on our technology and services to modernize their cybersecurity programs and mitigate the impact of all known cyber threats, we are well on our way to accomplishing our mission.

#### *Protecting Ourselves to Maintain Customer Trust*

We believe information privacy and data protection is a critical element of corporate responsibility for every organization. Customer trust — in our products, our services and our business practices — is a foundational to our mission. We recognize that we cannot protect our customers and achieve our mission without a deep commitment to information security and data privacy ourselves. As cybersecurity requirements evolve in response to work from home mandates, changes in the threat environment, digital transformation and other factors, we strive to follow the same cybersecurity best practices we recommend to our customers in our consulting engagements.

#### *Product Compliance and Certifications*

We believe our pursuit of technology certifications and industry compliance in general is critical to building customer trust and maintaining a robust and stalwart security profile. Because of this, FireEye is dedicated to ensuring its security products and technologies meet or exceed critical industry certifications and compliance requirements. Current certifications, including FedRamp certification, are listed on our Compliance and Certifications page on [www.fireeye.com](http://www.fireeye.com).

#### *Information Security and Data Privacy*

Our data privacy programs prioritize:

- **Ethics.** Our position as “trusted advisor” to our customers during times of complexity or duress often means our employees have access to confidential information related to cyber incidents. We maintain a strict confidentiality policy regarding our business relationships with our customers, as well as other customer-related data. We remind

employees of our policy through regular internal communications and require annual data privacy and security training for all employees. Our Code of Business Conduct and Ethics, which every employee must agree to as a condition of employment, outlines each individual's responsibilities to protect our company's, our customers' and our colleagues' data.

- **Compliance.** FireEye complies with the requirements of the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. FireEye adheres to the Privacy Shield Principles of notice, choice, onward transfer, security, data integrity and purpose limitation, access and recourse, enforcement and liability with respect to all personal information transferred from the EU or Switzerland to the US within the scope of its Privacy Shield certification. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/list>.

While Privacy Shield is not currently recognized as a legal mechanism of transfer for data originating from the EU to the US, FireEye maintains its compliance as the program is still active in the United States. It is possible that a successor framework will emerge as the change in U.S. administrations may lead to new arrangements with EU regulators.

- **Transparency.** We publish a detailed Online Privacy Statement outlining the principles governing our information practices and other privacy aspects of our websites. We also provide a direct email link to our data privacy team for any questions not answered in the Online Privacy Statement and for data subjects to exercise their rights under applicable data protection law.
- **Training and education.** All employees are required to attend annual training on data privacy and security. Our InfoSec team also publishes regular internal updates on data privacy, password and security best practices, phishing campaigns, security awareness and other topics related to both physical and cybersecurity.

### **Creating a Diverse and Inclusive Corporate Culture and Workforce**

We believe our ability to attract, engage and retain talent is necessary to drive achievement of our business objectives and ultimately realize our mission and vision. Doing the right thing for

our customers and employees is a core value of our culture that we believe creates value for our shareholders.

There are many things that define the culture of an organization — heritage, reputation, attitude, approach to execution, work ethic, and, most importantly, people. We seek out employees with qualities that facilitate high-quality results — those traits that give personal meaning to work and elevate our customers’ experiences. We believe that employees who feel appreciated create more satisfied customers, and we focus on improving and elevating our employees’ experiences at work. This means we are committed to providing a sense of belonging across our company that inspires everyone to respectfully speak-up, contribute their ideas, take action and be accountable.

Our fundamental employee experience philosophies are:

- We emphasize our ONE TEAM culture of respect and inclusiveness.
- We make recognition an integral part of our culture.
- We care about our employees and their overall well-being.
- We reward extraordinary performance and results.

#### *Diversity, inclusion and belonging*

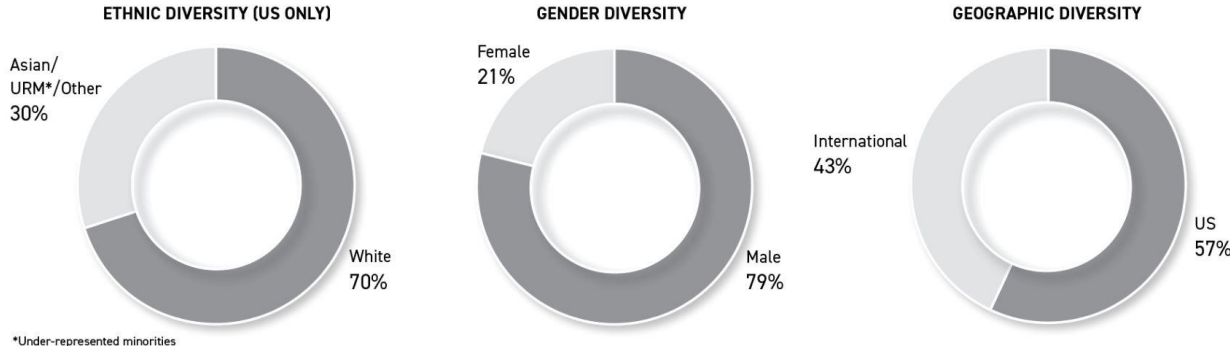
We believe that diverse teams maximize their potential and bring with them diverse views, experiences and perspectives. We seek to integrate diversity and inclusion into the employee lifecycle, and are committed to providing a work environment that is free of discrimination and harassment, where our employees can do their best work, bring their full self to work, feel supported and in turn support others. We strive to create a working environment where everyone feels included and respected and has an equal opportunity to contribute and to maximize their potential.

We have established a framework to drive diverse representation and inclusive behaviors across our company that includes actions to ensure equality of opportunity, increase diversity in our employee base, promote equality of pay across gender and ethnicity, and provide anti-bias

training and education. We also seek to promote diversity and inclusion in our communities by supporting organizations that champion diversity and inclusion initiatives.

In addition, we continue to invest in FireEye-sponsored programs such as Elevate, which offers training, mentoring and other resources to women leaders in cybersecurity, and partnerships with military and veterans' organizations.

As of December 31, 2020, we had approximately 3,400 employees, reflecting a global diversity of identity, background and experience.



*Compensation and Benefits*

We are committed to providing employees and their families with benefits packages that support physical, mental and financial well-being. Our intent is that any benefit plans offered by FireEye worldwide are regionally appropriate, and competitive with other high-tech companies. In addition to the foundational rewards like competitive pay and benefits, we provide cash incentives, equity-based compensation and employee stock purchase programs where possible, generous paid time-off, including paid parental leave, professional development opportunities, and many other employee perks. We constantly review our pay practices and benefits to ensure we can hire the best employees possible.

We also believe that equal pay is important to further advance diversity, inclusion and belonging in the workplace. In addition, we conduct an internal pay equity review each year which currently encompasses compensation analysis across gender globally as well as race and ethnicity categories in the U.S.

*Professional Development and Training*

We believe that a culture that encourages continued learning and development creates an environment where great people want to work and contribute their best efforts. We also believe that great leadership is how organizations endure and excel. To help our leaders, individual

contributors and teams reach their full potential, we offer extensive training and career development resources internally through our Learning and Development organization. These include leadership, soft skills, and technical training, coaching, and development consulting via traditional and nontraditional learning events, as well as free access to online learning platforms such as LinkedIn Learning. We also offer tuition reimbursement program for employees who wish to further their formal education.

To reinforce our corporate culture of respect, diversity and inclusion, each employee is required to complete anti-harassment and privacy awareness training annually. In 2020, we added a course on Breaking Bias: The Neuroscience of Diversity, Inclusion and Belonging, to build awareness of cognitive bias and how it impacts day-to-day interactions, people, business and life decisions. We are investigating additional training resources to support our diversity, inclusion and belonging programs we expect to implement in 2021.

#### *Communication and Engagement*

We strongly believe that our culture depends on our employees' engagement and understanding of their contribution to the achievement of our strategic imperatives, vision and mission. Communicating powerfully and prolifically is a core competency in our ONE TEAM framework, and our senior leaders communicate regularly through a variety of channels, including quarterly all-hands meetings that are broadcast globally, weekly CEO updates, a monthly newsletter and regular "FireEye on a Mission" updates. We also enabled Yammer, the community and social interaction tool available in Office365, company-wide to address the need for more social and community interaction in our globally diverse workforce.

We have many active Yammer communities, including communities hosted by our employee resource groups Eye on Veterans, Eye on Pride, and BOLD: Black Organization for Leadership and Development.

In addition to prioritizing regular communications, we conduct regular employee surveys to seek feedback on what is going well and where we can focus our efforts to do more. Our annual company survey continues to surpass 80 percent participation rate each year, representing a wide cross segment of our employee population.

#### *Our Response to COVID-19*

As part of our efforts to keep our employees safe and support efforts to slow the spread of COVID-19, we instituted a mandatory work-from-home policy for all but a small number of onsite essential personnel and we restricted travel to essential, "business-critical" needs. With the support and commitment of our employees, we were able to seamlessly pivot to a work-from-home model and continue protecting our customers without interruption.

We believe open and on-going communications have been critical to maintaining our culture and productivity during the pandemic, and we hosted weekly update calls and created an internal

website designed for this purpose. We also instituted multiple measures to maintain the health and well-being of our employees, while continuing to deliver our essential cybersecurity solutions to customers around the world. Specific measures included regular employee surveys to assess employee attitudes toward work location, “self-care days” to enable rest, volunteering, or family time, online training, wellness and support programs, and a stipend to office-based employees to assist in the functional set-up of their remote working environment.

Our Pandemic Response Team continues to monitor conditions and mandates globally to ensure safe practices as the pandemic evolves.

### **Promoting Responsible Global Citizenship**

We believe in making a positive impact in the communities where we live and work, and we embrace the concept of “think globally, act locally” as the most effective framework for implementing our sustainability values in a manner consistent with local practice, culture and needs.

#### **Volunteering and Philanthropy**

We strive to empower our local communities throughout the world through regular philanthropic efforts, including food drives, our annual back-to-school backpack program, disaster relief, support for veterans, and other local programs. We also make a donation to Doctors Without Borders on the first anniversary of every employee’s employment start date. Since 2014, we have donated more than \$245,000 to this global organization.

We also encourage our employees to volunteer their time or donate money to charitable organizations of their choice and our Total Rewards benefits package includes a paid Philanthropy Day. Each year FireEye employees log thousands of hours supporting local causes individually and through department-level activities.

In the wake of the COVID-19 pandemic and multiple natural disasters in 2020, Team FireEye has stepped up to assist in a very big way. A few of the many recent philanthropic activities championed by our employees included:

- A pre-pandemic team Philanthropy Day at a local foodbank in Sydney, Australia where FireEye/Mandiant employees spent the day sorting food donations for delivery to communities those impacted by devastating bushfires.
- A drive to help those impacted by the wildfires in the California wine region. Donations from employees and FireEye match for victims of the hurricanes in the

southeastern United States.

- A virtual food drive and giving campaign with Feeding America in honor of Martin Luther King Day, sponsored by our BOLD employee resource group.

The company plans to continue organizing efforts that will enable employees to open their hearts and pool their resources to benefit others in regions impacted by natural disasters, famine, and other conditions that threaten health and well-being.

### *Protecting our Environment*

We are committed to sustainable business practices for our people and for the environment. This responsibility extends from our internal operations to our diverse eco-system of partners and to our customers. We believe every individual can make a difference and that even small changes can have a big impact. At the corporate level, our commitment is reflected in our facilities management, our product engineering, our manufacturing relationships and our initiatives to increase efficiency through data center consolidation. Reducing the environmental footprint of our cybersecurity solutions

#### *Reducing the environmental footprint of our cybersecurity solutions*

We are committed to reducing the environmental impact of our solutions through innovation. Our efforts are focused on increasing efficiency and scalability with cloud-based solutions and engineering based advancements in our appliances. Although appliance hardware sales accounted for only 10% of our annual sales in 2020, we have many customers with on-premise and hybrid cybersecurity controls and we continue to deliver thousands of new appliances each year.

#### *Sustainability in Hardware Design and Manufacturing*

Since the introduction of our first security appliance in 2012, we have continued to innovate to improve the efficiency and scalability of our hardware-based solutions. Today's 5 and 6 generation appliance support more users, consume less power and require less raw materials in the manufacturing process than prior generations of appliances. We rearchitected our core detection software and MVX engine to enable distributed and cloudbased deployment of our network, email and endpoint security solutions. The new architecture allowed customers to extend FireEye detection and protection technologies to cloud-based workloads and remote offices without purchasing new hardware.

As we advance the features and functionality of our solutions, we offer appliance trade-in and upgrade programs and encourage customers to implement scalable virtual solutions. These



programs help customers update and expand their security controls and ensure obsolete hardware components are recycled or disposed of properly.

We exercise the same care and commitment to sustainability in the management of replacement inventory and demonstration units. We partner with Flextronics for the manufacture of our appliances, a recognized leader in sustainability measurement and reporting. Their commitment to sustainability programs is detailed in the Flextronics 2020 Sustainability Report.

#### *Data Center Sustainability Efforts*

We host the majority of our cloud-native solutions on Amazon Web Services (AWS). This allows us to scale the capacity of our threat detection and analysis solutions to meet our service-level commitments to customers without an increase in property, plant and equipment. The global availability of Amazon Web Services (AWS) and their commitment to environmentally friendly business practices and renewable energy is consistent with our own efforts to reduce our energy consumption and carbon footprint.

As part of our business transformation strategy, we launched an initiative in 2019 to migrate our Dynamic Threat Intelligence infrastructure — the system that collects and analyzes real time threat data from our products and delivers near real-time threat intelligence and software updates to our network and email security appliances — to AWS. This initiative will allow us maintain data privacy while building redundancy into our infrastructure, scaling our capacity up or down in response to customer demand, reducing our energy consumption, and limiting our expenditures for new equipment, data center management and co-location fees.

We migrated two data centers in international co-location facilities in 2020 and anticipate migrating two additional data centers to AWS in 2021. We anticipate we will continue to maintain data centers at our Milpitas, CA U.S. headquarters and other locations internationally in compliance with data sovereignty requirements and local data privacy regulations.

#### *Sustainability in our Workplaces*

Our commitment to sustainability through innovation extends to our workplaces. We have several initiatives underway, many the result of employee suggestions.

— **LEED and other Environmental Certifications.** We are currently evaluating LEED and Energy Star certifications for our Milpitas, CA facility. The buildings that house our offices in Alexandria, VA, Reston, VA, and San Francisco, CA have been LEED certified. Additionally, the facilities in Alexandria and San Francisco have been awarded Energy Star certification.

— **Energy consumption.** While many of our locations are partial leases of larger complexes, giving us limited control over energy consumption and sources, we are currently evaluating our

energy use and sources worldwide. This initiative will allow us to identify new opportunities to conserve energy, access sustainable energy sources and reduce our carbon emissions.

— **Flexible Use Workspaces.** As we prepare to return to our workplaces, we took employees’ responses to our COVID-19 surveys into account. As a result, we are planning for a more flexible/hybrid model of workplace design with more shared workspaces and fewer assigned offices. We expect this initiative to reduce the total square footage of our facilities and lessen commute times for our employees. As we design these new, modern workplaces, we are taking into account the latest innovations and environmental design standards. We believe these efforts will, in turn, increase productivity and contribute to a better work-life balance for our people, help diminish congestion on our roadways, and reduce total carbon emissions.

— **Everyday environmental awareness.** We believe that small steps, when implemented by a large number of people, can have a big impact on our environmental footprint. We have taken measures to conserve water through flow regulators and automatic faucets in our breakrooms and lavatories and reduce electricity use with motion sensors. We also encourage our employees around the world to participate in our environmental sustainability efforts, including programs to reduce the use of disposable plastic water bottles and promote recycling and composting to divert waste from landfills.

#### *Extending Our Policies Globally through our Suppliers*

We view fostering basic human rights, sustainable manufacturing processes and ethical business practices around the world as a fundamental responsibility. One of the many dependencies in establishing a solid foundation is establishing and maintaining business arrangements with organizations that share a similar strong commitment to sustainable and ethical business practices.

- As part of our on-boarding of new suppliers, we perform an extensive review of suppliers’ compliance with data privacy regulations, information security policies, environmental, health and safety programs and labor practices. When a supplier accepts a purchase order, they agree to comply with our Supplier Code of Conduct, which clearly articulates our vision and expectations for ethical and sustainable business practices. We also encourage our suppliers, partners, and contractors to adopt their own corporate citizenship and sustainability guidelines.
- We believe using Diverse Suppliers enhances our competitive advantage, and we are committed to identifying, purchasing from and maintaining relationships with small businesses, as well as businesses owned by women, minorities, veterans, and disabled persons. As part of our Supplier Diversity Policy, we encourage our suppliers to

participate in our procurement and sourcing processes and set an annual goal for total annual spending with diverse suppliers.

Our Supplier Code of Conduct, our Modern Slavery Act Statement and our Conflict Minerals Policy are publicly available on our website.