

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Accedian Networks Inc. and its subsidiaries ("**Accedian**"), we have a zero-tolerance approach to modern slavery, and are fully committed to preventing slavery and human trafficking in our operation and supply chain. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2019.

Our business and supply chains

Accedian business activities are to provide network and application performance assurance solutions to monitor, maintain, optimize, and manage network and application performance so that mobile operators, service providers and enterprises can deliver the best possible services to their customers. Accedian has approximately 300 employees working in over 22 countries around the world. We use suppliers and contract manufacturers around the world to supply parts and components for the manufacture and support of our products.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We comply with the laws regarding slavery and human trafficking in countries in which we do business and require that our partners, suppliers and contract manufacturers do the same.

Accedian operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct - our code encourages employees and applicable external stakeholders to do the right thing by clearly stating the actions and behavior expected of them when representing the business. We strive to maintain the highest standards of conduct and ethical behavior when operating abroad and managing our supply chain. Our Code prohibits our employees and applicable external stakeholders from supporting or using "any forms of forced, compulsory or child labor."

Monitoring

Our contracts require that our external stakeholders, including but not limited to

Partners, Suppliers and Contractors, comply with all applicable laws and regulations which include but are not limited to all rules, regulations and provisions relevant to health, safety, human rights, labor, ethics, and the environment.

While we do not routinely request certification from our suppliers or contract manufacturers, any indications of slavery or human trafficking would be swiftly investigated.

Our whistleblower email provided in our Code of Conduct enables employees and other stakeholders to confidentially lodge any concerns about the actions of partners, managers, employees or suppliers with respect to human rights violations or other violations of the Code of Conduct.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our stakeholders, but if we were, then we would act immediately against the supplier and report it to the authorities.

Further Steps

Accedian is a fast growing company and we are committed to doing more in in the near future. As such, for the year 2019, we will implement a due diligence process and set out the key performance indicators (KPIs) that we shall use to measure how effective we have been to ensure that slavery and human trafficking has not taken place in our business and supply chains. We will also include this topic in the training we will be providing to our employees.

Lastly, Accedian is in the process of adopting the Responsible Business Alliance Code ("RBACC") of Conduct which prohibits the use of forced labor. Eventually, we will seek confirmation from all stakeholders that they comply with the RBACC. Accedian's internal policies and practices will implement the RBACC.

This statement will reviewed and updated annually.



Jacques Lemoine
Vice-President & General Counsel

March 15, 2019