

February 20, 2026

Dear Access Now:

We appreciate the opportunity to engage with you regarding the significant progress AppLogic Networks has made toward reducing the risk of third-party product misuse that infringes upon human rights since AppLogic Networks emerged nearly a year ago as a new, distinct entity from its predecessor Sandvine Corporation (Sandvine) (see [Sandvine emerges as AppLogic Networks](#)). The differences between AppLogic Networks and Sandvine should not be oversimplified as a mere name change. AppLogic Networks has a new chief executive, new owners, new governance framework, and a new business model as a global software technology solutions leader focused on democratic jurisdictions.

At every step of this journey, we have engaged extensively, constructively, and proactively with members of civil society, non-governmental organizations (NGOs), U.S. government agencies, and our customers, providing transparency about what we are doing, how we are doing it, and why it matters.

Central to AppLogic Networks' transformation has been the company's shift to a business model that focuses on customers in democracies, which means that we do not engage in business with governments and third parties in countries that are deemed authoritarian by leading independent global indices such as The Economist Intelligence Unit Democracy Index and Freedom House Freedom on the Net Report. AppLogic Networks' approach recognizes that internet-related technologies can be used responsibly, including to ensure the effective operability of the internet, but these same technologies can also be misused in ways that violate human rights. We believe the most effective way to prevent, detect, and minimize the potential misuse of our products is to simply not sell these technological capabilities in non democratic countries and to apply risk-based human rights due diligence in the jurisdictions where we do operate. AppLogic Networks is the only networking vendor in the world that has gone further by choosing to do business in democracies, rather than relying on risk mitigation processes alone to reduce the risk of potential product misuse.

AppLogic Networks has been transparent about our efforts to put this new business model into action, including with Access Now. In our discussion with Access Now in May 2025, we informed you that Sandvine had exited its government of Egypt customers as of March 31, 2025 and planned to exit all non government Egypt customers and several non-democracies by December 31, 2025. This information was enumerated in Sandvine's November 21, 2024 letter to Access Now. On January 5, 2026, we publicly announced that these actions had been completed (see [AppLogic Networks: Putting Business Integrity into Action](#)). This is not only a meaningful and demonstrable action by a company to mitigate the risk of potential third-party product misuse, but as you know, it is a step that sets AppLogic Networks apart from other networking vendors who have not made such commitments or taken such action.

AppLogic Networks has also made significant strides in building robust Human Rights Due Diligence (HRDD) processes to mitigate risk of potential third-party product misuse associated with business opportunities. Those actions, which AppLogic Networks has publicly announced (see [AppLogic Networks: Putting Business Integrity into Action](#) and [What We're Doing and Why It Matters](#)), have been described in more detail in AppLogic Networks' public responses to other NGOs and include:

1. Appointing a dedicated and independent Human Rights Committee, reporting to the Board of Directors
2. Appointing an Independent Human Rights Senior Advisor, reporting directly to the AppLogic Networks' Board of Directors
3. Hiring a dedicated Chief Ethics and Compliance Officer, reporting directly to the CEO
4. Making a public commitment to respect human rights, mitigate risks of potential third-party

product misuse to violate human rights, and taking action to remediate identified third party product misuse involving AppLogic Networks' products

5. Conducting business in democracies and continuing to conduct human rights due diligence globally
6. Publicly committing to provide 1% of annual profits to one or more NGOs that protect human rights, human rights defenders, journalists, and others, and promoting Internet freedom
7. Releasing a publicly available Human Rights Statement informed by the U.N. Guiding Principles (UNGPs), members of civil society, NGOs, and other outside advisors, and referencing the International Bill of Human Rights
8. Implementing a Global Human Rights Due Diligence & Risk Management Policy (HRDD Policy), informed by the UNGPs, input from civil society members, NGOs, and other outside advisors. The HRDD Policy applies globally and provides a framework for how the company mitigates salient human rights risks relating to its products
9. Maintaining a Progressive Escalation Framework, which includes the Company's investigation and resolution practices in the event of identified third party product misuse involving AppLogic Networks' products
10. Including contractual clauses in customer end user license agreements that require responsible use of the Company's products
11. Requiring all employees, including Company senior leadership, to take training regarding human rights related potential risks associated with AppLogic Networks' products, which includes fundamentals of corporate responsibility under the UNGPs
12. Conducting pre-sale human rights due diligence concerning certain sales opportunities, which has resulted in the Company declining certain sales opportunities
13. Monitoring the risk landscape as well as indicia of potential third-party product misuse involving AppLogic Networks' products post-sale
14. Maintaining an independent third-party grievance mechanism, which allows for anonymous reporting from internal and external stakeholders to manage allegations, including potential product misuse¹
15. Maintaining an active Business Ethics Committee comprised of senior Company executives that implements the Company's HRDD Policy and evaluate human rights-related risks associated with the Company's products, and includes technical staff to field questions relating to product capabilities
16. Participating in multistakeholder initiatives and/or forums that prioritize respecting human rights, including by serving as an observer of the [Global Network Initiative](#)
17. Supporting its legal predecessor company's (Sandvine's) periodic reports to the U.S. Government regarding its compliance with its commitments, including reporting on Sandvine Corporation's completion of its exit from over 20 non-democracies as of December 31, 2025
18. Committing to cooperate in good faith with any judicial, government, or regulatory investigations of potential product misuse involving the Company's products

¹ Access Now's letter expresses concern for recent reports of human rights abuses in Egypt. Today, neither AppLogic Networks nor Sandvine conduct business in Egypt, and neither company owns any hardware in that country. If Access Now, or any of its partners or associates, are aware of any reason to believe that AppLogic Networks' or Sandvine's products are being misused, we strongly encourage those with relevant information to report it to us directly at BEC@applogicnetworks.com or via our [publicly accessible AppLogic Networks Reporting Helpline](#), which is

managed by an independent third party.

19. Maintaining a no retaliation policy against any person for raising a concern, reporting an issue, or critiquing the Company in good faith
20. Maintaining a Code of Conduct informed by the UNGPs
21. Adhering to the corporate value of “Doing the Right Thing,” which pertains to doing the right thing to respect human rights and responsible business practices
22. Obfuscating subscriber identities in AppLogic Networks’ products to protect privacy. Use of subscriber identities in clear text requires a customer to secure a specific product license
23. Ensuring that wherever possible in AppLogic Networks’ products, functions such as the redirect capability are made apparent in the network traffic (via IP identifiers and headers) to provide greater visibility that an AppLogic Networks product is being used and to identify the third-party user
24. Ensuring features in AppLogic Networks products that may be misused such as redirect and blocking are all features which require a license, enabling AppLogic Networks to be more surgical in what capabilities are sold and the manner in which our products can be used

As a company committed to continuous improvement, we will continue to enhance our human rights due diligence policy and processes to prevent, detect, and mitigate the risk of the company’s products being misused by end users to violate human rights. This effort is informed by the input of external stakeholders, including non-governmental organizations, members of civil society, and like-minded companies and organizations that are committed to respecting human and digital rights globally.

To this end, in 2025, AppLogic Networks became an observer of the [Global Network Initiative](#) (GNI), a community focused on promoting human rights, protecting freedom of expression, and sharing lessons learned to the benefit of the GNI and broader community. AppLogic Networks also consults directly with members of civil society, NGOs, and outside advisors to engage in constructive dialogue as well as to better understand how it can support digital human rights and mitigate the risk of human rights harms.

Consistent with our commitment to support human rights and foster constructive dialogue with like minded organizations, we are pleased to report that AppLogic Networks has met its public commitment to provide 1% of its annual profits (or a minimum of \$25,000, whichever is larger) to one or more NGOs that promote human rights, protect human rights defenders, journalists, and others, and promote Internet freedom, starting with the fiscal year ending December 31, 2025 (see [AppLogic Networks: Putting Business Integrity into Action](#) and [What We’re Doing and Why It Matters](#)). AppLogic Networks has issued its inaugural donation to a global NGO with a proven track record of promoting human rights, protecting human rights defenders, and protecting internet freedom.

As you know, AppLogic Networks has repeatedly sought to engage with Access Now, and we have offered several ways in which we could collaborate with Access Now to engage with other members of civil society and NGOs. In light of this, we were disappointed that Access Now did not seek to engage us before publishing its open letter of February 2026. We were also disappointed that Access Now did not publish or share Sandvine’s November 2024 response with Access Now’s letter signatories. We were further disappointed that Access Now cancelled a planned October 2025 meeting between AppLogic Networks and one of the NGOs that signed Access Now’s open letter to discuss AppLogic Networks’ transformation and journey. Of course, Access Now has the discretion to determine when, how, and whether it engages with any company or organization. However, we hope that Access Now will reconsider its decision and choose to facilitate such dialogue in the future.

When we have reached out to Access Now and you have contacted us, we have always been responsive and sought to engage with you in an open, constructive, and respectful manner. We remain open to constructive engagement and hope that our response clarifies any misunderstandings you may have about our commitments and the efforts we have made to turn those commitments into action.

You indicated that you will publish AppLogic Networks' full response, and we look forward to Access Now doing so.

Best regards,

Carol Tate
Chief Ethics and Compliance Officer
AppLogic Networks