

Corporate Social Responsibility Policy Adopted August 2018

This Corporate Social Responsibility Policy applies to Extreme Networks, Inc. (including its subsidiaries and affiliates, the “Company”) and its contract manufacturers and suppliers (collectively, the “Suppliers”). The Company and its Suppliers shall comply with, and shall require subcontractors and any person under its or their control to comply with, applicable local, state, national, and international laws, rules and regulations relating to ethical and responsible standards of behavior, including, without limitation, those dealing with employment practices, environmental protection, sustainable development, and bribery and corruption.

The Company’s Suppliers will be expected to certify compliance with this Policy at the Company’s request and to authorize the Company and its designated agents (including any third parties) to engage in monitoring activities, including on-site inspections made upon reasonable notice.

In addition to compliance with this Policy, the Company’s Suppliers are expected to comply with the Company’s Supplier Expectations and Guidelines (QMS – 00055 / R02), as amended from time to time.

Employment Practices

1. **Minimum Age for Employment.** The Company and its Suppliers will not employ anyone under the legal working age as defined by local law.
2. **Forced Labor.** The Company and its Suppliers will not use forced or involuntary prison labor.
3. **Abuse.** The Company and its Suppliers will not use corporal punishment or other forms of physical abuse of their employees.
4. **Non-Discrimination.**
 - a. United States. The Company is an equal opportunity employer and a U.S. federal contractor. The Company and its Suppliers agree that, as applicable, they will abide by U.S. laws and regulations that prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, or national origin. The Company and its Suppliers shall also comply with any applicable state laws pertaining to non-discrimination.
 - b. Outside of the U.S. The Company and its Suppliers will not discriminate on the basis of any condition or characteristic that is protected by applicable local laws or regulations.
5. **Freedom of Association.** The Company and its Suppliers will recognize and respect each employee’s right to associate with any legally sanctioned organization, including labor unions.
6. **Work Hours, Work Week, and Payment of Wages.** The Company and its Suppliers will comply with all applicable local laws related to work hours, works weeks, and payment of wages.
7. **Health and Safety.** The Company and its Suppliers will provide employees with working conditions that are in compliance with all applicable local laws and regulations regarding worker health and safety.
8. **Privacy and GDPR.** The Company and its Suppliers will take reasonable efforts to protect the reasonable privacy expectations of personal information of everyone they do business with, including Suppliers, customers, consumers, and employees and will comply with privacy and

information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Business Integrity

1. Suppliers.

- a. The Company's Suppliers will promote honesty and integrity in their business conduct by raising ethical awareness among their employees and providing direction and education on ethical issues.
- b. The Company's Suppliers are required to understand and comply with the terms of the U.S. Foreign Corrupt Practice Act, as amended, and the Suppliers may not pay, offer, or promise to pay, or authorize the payment, directly or indirectly, of any monies or anything of value to any government official, government employee, political party, or candidate for political office for the purpose of influencing any act or decision of such person or of the government to obtain or retain business, or direct business to any person.
- c. In addition to the above FCPA compliance, the Company's Suppliers will not pay or accept bribes, arrange or accept kickbacks, or participate in any other inducements that are prohibited by local law with respect to any business or government relationships.

2. Company.

- a. The Company and its employees, directors, and consultants will promote honesty and integrity in their business conduct and will comply with the terms of the Company's Code of Business Conduct and Ethics, a copy of which is available on the Company's external website.

Charitable Giving and Activities

1. The Company strives to make positive contributions in the communities in which it operates and encourages its employees to do the same. The Company's corporate philanthropy is principally directed to educational, scientific and humanitarian endeavors across the globe. In certain cases, charitable funds raised by employees are matched by the Company. In addition, the Company encourages (but does not require) that the Company's Suppliers take similar actions.

Environment, Safety, and Conflict Minerals

1. The Company and its Suppliers will work to continuously improve their environmental performance by setting and then working toward goals that reduce the environmental impact of their activities. The Company has a visible waste management policy in all of its offices and employees are encouraged to recycle. Lighting in all of the Company's offices is sensor driven to reduce consumption of electricity. In addition, the Company encourages employees to use video conferencing in lieu of traveling to meetings at other Company offices.
2. The Company and its Suppliers will comply with applicable environmental laws and regulations in their operations and will develop and implement plans and programs to correct any non-compliant practices. Specifically, the Company and its Suppliers will ensure that the Company's products and the components used in those products are ROHS (Restriction of Hazardous Substances) and WEEE (Waste from Electrical and Electronic Equipment) compliant and the

Company's engineering team will design the Company's products with recycling and recovery in mind.

3. The Company requires key suppliers to have the ISO 14001 environmental certification.
4. The Company has established a conflict minerals compliance program that is based on the framework established by the Organisation for Economic Cooperation and Development. As part of this program, the Company adopted the Extreme Networks Conflict Minerals Policy, which has been communicated to our Suppliers, which directs our Suppliers to utilize a supply chain that does not support the conflict in the relevant areas. A copy of this policy is available on the Company's external website.