

CONFLICT MINERALS POLICY

The United States Government and Extreme Networks are concerned over human rights violations that are perpetrated throughout the world. One area of the world in which human rights violations have been perpetrated against individuals is the Democratic Republic of the Congo (DRC). In the DRC, armed groups violate human rights by exploiting individuals to mine various minerals (e.g., Cassiterite (for Tin), Wolframite (for Tungsten), Columbite-tantalite (for Tantalum) and Gold Ore so that these groups can sell such minerals for the manufacture of electronic and computer equipment. Such activity has been commonly referred to as “blood diamond” activity. Accordingly, the United States Government, under the Dodd-Frank Wall Street Reform and Consumer Protection Act (also referred to as the “Dodd-Frank Act”), has passed legislation that requires U.S. publicly-traded companies that manufacture electronic and computer equipment to audit their supply chains and report conflict minerals usage in their products (i.e., disclose the source of any “conflict minerals” necessary to the functionality or production of products manufactured or contracted to manufacture).

Conflict Minerals refers to the minerals mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and adjoining countries. The primary conflict minerals include: Columbite-tantalite (tantalum), Cassiterite (Tin), Gold, Wolframite (Tungsten) or the derivatives of these minerals. These minerals are also referred to as the “3TG Minerals”.

As a publicly traded US company, Extreme Networks (EXTR : NASDAQ) is committed to complying with all U.S. laws, including the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, and sourcing material from environmentally and socially responsible suppliers as required by law. See <https://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>. Accordingly, Extreme Networks hereby adopts this Policy to help it comply with the requirements of the specific portion of the Dodd-Frank Act that addresses “conflict minerals” or “3TG Minerals”.

Pursuant to this Policy, Extreme Networks shall, and hereby does, adopt and implement procedures to due diligently operate, oversee and timely audit its supplier-base against the requirements of the Dodd-Frank Act governing “conflict minerals”. Extreme Networks will work with due diligence to investigate and report the sourcing of its products containing 3TG minerals as required by law under the Dodd-Frank Act.

More specifically, Extreme Networks is currently surveying, and will continue to survey, its suppliers to ascertain the source (Country of Origin) for any 3TG Minerals used in our products. If any of our products are found to contain 3TG Minerals that originate from the conflict region, we will require these minerals to be

sourced from Conflict Free Smelter as defined by EICC and GeSI <http://www.eicc.info/CFSPProgram.shtml>. In addition, if we find products that contain 3TG Minerals that originate from the conflict region and are not sourced from Conflict Free Smelter supplier, we will work with due diligence to remove any such sources in a timely manner from our supply chain as required by law, and if not required by law, to the extent that we can do so safely and there is a suitable and appropriate substitute. Our procedures will address this lengthy and complex process with due diligence in order to obtain accurate and complete information.

Also, to comply with the laws of the Dodd-Frank Act and meet the goals of this Policy, Extreme Networks has embraced, and will use, the Electronics Industry Citizenship Coalition's (EICC) conflict mineral reporting form, which requires suppliers to report mineral supply chain status. To review the Conflict Minerals reporting template, refer to <http://www.conflictreesourcing.org/>. More specifically, Extreme Networks will and shall require all suppliers of components or assemblies used in Extreme Networks' products to provide detailed conflict mineral country of origin information utilizing the EICC mineral reporting form [or its equivalent]. Suppliers will and shall also be required to exercise due diligence in obtaining accurate information and ensuring that any 3TG minerals that are used will be sourced from appropriate sources in compliance with U.S. law.

If you have any questions or concerns, please feel free to contact Thomas Whissel.
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