

Extreme Networks, Inc.
Supplier Code of Conduct

I. Introduction.

This Supplier Code of Conduct (the “Code”) applies to all suppliers, vendors, contractors, consultants and other third parties (collectively referred to as “You”) from whom Extreme Networks, Inc. (including its affiliates) purchases goods or services. By accepting a purchase order from Extreme Networks, You acknowledge your acceptance of this Code and of your intent to comply with it.

II. Employment Practices:

- *Minimum Age for Employment.* You do not employ anyone under the legal working age as defined by local law and follow all applicable laws and regulations regarding child labor.
- *Forced Labor.* You do not use forced, bonded (including debt bondage) or indentured labor, or involuntary prison labor, slavery or trafficking of persons.
- *Abuse and Humane Treatment.* You treat your employees with respect and dignity: physical, sexual, psychological or verbal harassment are strictly prohibited. You do not use corporal punishment or other forms of physical abuse of your employees. You take all measures to create a work environment where no intimidation, harassment or violence could take place.
- *Non-Discrimination.*

United States. Extreme is an equal opportunity employer and a U.S. federal subcontractor. You comply with all applicable 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 age, race, color, religion, sex, sexual orientation, gender identity, ancestry, disability, genetic characteristic or information, marital status, veteran status, national origin, or any other characteristic protected by applicable federal, state, or local law. You shall also comply with any applicable state laws pertaining to non-discrimination.

Outside of the U.S. You do not discriminate on the basis of any condition or characteristic that is protected by applicable local laws or regulations.

Written Policy. You have a written non-discrimination policy in place, communicate it to your employees and provide them with a confidential and trusted grievance mechanism. You should base your performance appraisal process on merit and promote equal opportunities.

- *Freedom of Association.* You recognize and respect each employee's right to freely associate with any legally sanctioned organization.
- *Work Hours, Work Week, and Payment of Wages.* You comply with all applicable local laws related to work hours, works weeks, and payment of wages. And, as may be required by applicable law, You provide your employees with rest periods for breaks and meals, vacation time, maternity and sick leave, and paid time off for national or local holidays.
- *Health and Safety.* You follow all applicable local laws and regulations regarding worker health and safety. You have written procedures and monitoring programs in place to help prevent accidents and injuries (while performing work or arising out of). Your policies encourage employee input regarding health and safety issues.
- *Drug-Free Workplace.* You maintain a safe and drug-free work environment. You expressly prohibit the use, possession, solicitation for, or sale of narcotics or other illegal drugs, alcohol, or prescription medication by your personnel, without a prescription on your or customers' premises or while performing work.

III. Privacy.

- You take reasonable efforts to protect the reasonable privacy expectations of personal information of everyone You do business with, including your suppliers, customers, consumers, and employees, and You comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, or shared.

IV. The Environment.

- You work to continuously improve your environmental performance by setting and then working toward goals that reduce the environmental impact of your business activities. You seek to develop eco-efficient or energy-efficient products or services; reduce consumption of resources, energy and water to improve the overall lifecycle of your products or services.
- You comply with applicable environmental laws and regulations in your operations and develop and implement plans and programs to correct any non-compliant practices. When applicable, You ensure that your products and the components used in those products are ROHS (Restriction of Hazardous Substances) and WEEE (Waste from Electrical and Electronic Equipment) compliant.
- If applicable to the products or services You provide to Extreme, You may be required to have and maintain ISO 14001 environmental certification.

V. Conflict Minerals.

Extreme is required to report to the U.S. Securities and Exchange Commission on

our use of conflict minerals. We expect You to support our efforts to conduct due diligence on the use of conflict minerals in our supply chain. We have established a conflict minerals compliance program that is based on the framework established by the Organization for Economic Cooperation and Development. As part of this program, we have adopted the Extreme Networks Conflict Minerals Policy, available [here](#) which directs You to utilize a supply chain that does not support the conflict in the relevant areas.

VI. Ethical Business Practices.

- *Anti-Corruption Laws.* You comply with anti-corruption and anti-bribery laws, including, but not limited to, the U.S. Foreign Corrupt Practice Act (“FCPA”), the U.K. Bribery Act, and other applicable laws. You do 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.
- *Illegal Payments.* In addition to the above, You do 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.
- *Anti-trust.* Your business practices conform to applicable antitrust/competition laws. You never enter into any agreements – whether express or implied – that violate the letter or spirit of anti-competition laws. You have monitoring and enforcement procedures in place to ensure compliance with such laws.
- *Conflict of Interests.* You avoid potential or actual conflicts of interest in your dealings with us. You do not engage in activities or transactions that would or could improperly benefit, or appear to improperly benefit, any Extreme employee. You proactively notify Extreme if any actual or potential conflicts of interest arises relating to your activities as an Extreme supplier.
- *Gifts and Gratuities.* No gifts or gratuities may be accepted by Extreme employees from vendors seeking Extreme business, and You are prohibited from offering any gifts or gratuities to Extreme employees to obtain or retain business or to gain an advantage. A narrow exception allows Extreme employees to accept items or hospitality of a nominal value no greater than twenty dollars (\$20 USD) (for example, a logo coffee mug, pen, or holiday card) given at main holidays or other special occasions if the Extreme employee is not primarily involved in the procurement or contracting process.

- *Insider Trading.* Your employees and representatives understand and comply with insider trading laws and regulations and refrain from trading securities of Extreme or any other issuer based on confidential information obtained by virtue of being an Extreme supplier.
- *Ethical Training/Awareness.* You promote honesty, fairness and integrity in your business conduct by raising ethical awareness among your employees and providing direction and ongoing training and education on ethical issues.

VII. *Intellectual Property and Protection of Confidential Information*

- You respect the intellectual property rights of Extreme and other third parties. This also applies to the transfer of technology and know-how. You will not obtain, distribute or use unlicensed copyrighted software or information without proper authorization from Extreme.
- You follow information security processes regarding how information is collected, used, stored, shared and transmitted, and You comply with applicable data privacy laws.
- You maintain the confidentiality of information we disclose to you, pursuant to confidentiality terms in your agreement(s) with Extreme.

VIII. *Import and Export Control.*

Your business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components and related technical data. When necessary, You provide complete and accurate information and obtain export licenses and/or authorizations.

IX. *Quality.*

You have robust quality standards and assurance processes that enable the detection of defects and the implementation of corrective actions, in support of delivering high-quality products and/or services to us. For Supplier of products and/or components, you have processes in place to prevent the introduction of, and to exclude, if found, any counterfeit parts and materials into the products and/or components delivered to us.

X. *Maintaining Accurate Records.*

You keep accurate books and records. Your records must be in accordance with applicable standard accounting practices, including having reasonable documentation to demonstrate your compliance with this Code.

XI. *Supplier Diversity Programs.*

Diverse businesses include businesses identified as being minority owned, woman owned, veteran (and/or service-disabled veteran) owned or located in a HUBZone certified area and be certified as a HUBZone business, or a certified small disadvantaged business. Extreme has a robust supplier diversity program which continually scales for strategic growth both as a requirement of some of our customers, as well as a corporate initiative. As a supplier, You must identify your

status (diverse or not) to Extreme. Suppliers who are diverse, but who are not certified as diverse, are strongly encouraged to do so. Extreme's Supplier Diversity Manager can assist with guidance on how to become certified – please email SupplierDiversity@extremenetworks.com.

X. *Compliance/Reporting Code Violations/Concerns.*

Suppliers are expected to meet the requirements of this Code by maintaining their own ethics and compliance programs. In the event of a Code violation, Extreme may seek corrective actions by the Supplier. If a Code violation pertains to an actual or potential violation of law or regulation, we may be required to report the matter to the proper legal authorities, and we reserve the right to terminate our relationship with the Supplier, and to take other legal action, as may be provided in our agreement with the Supplier.

Reporting Concerns. Suppliers who have any concerns related to compliance with this Code should report their concerns to Extreme. If You wish to report any concerns anonymously or confidentially, then You may do so as follows:

- Mail a description of the suspected violation or other complaint or concern to: Chief Administrative Officer, or Audit Committee Chairman, 6480 Via Del Oro, San Jose, CA 95119 **or**
- Send an email to EXTR-Supplier-COC@extremenetworks.com **or**
- Call 1-866-690-3005

-End of Supplier Code of Conduct-