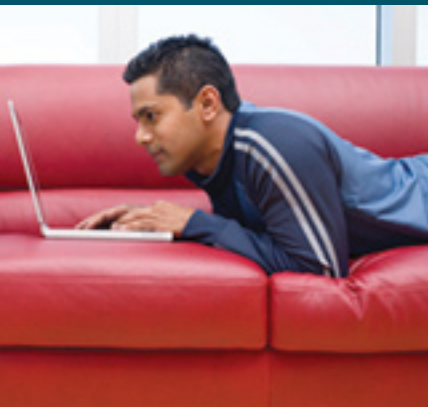


# Supplier Ethics Policy



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Cisco Systems, Inc. and its affiliated entities worldwide (Cisco) are committed to the highest standards of product quality and business integrity in their dealings with customers and suppliers. As a result, all suppliers and the Cisco employees who work with them are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to Cisco that suppliers and employees alike maintain high ethical standards, adhere to all applicable laws, and avoid even the perception of impropriety or conflict of interest.

## Introduction

This policy applies globally to all Cisco suppliers. “Supplier” here means any business, company, corporation, person or other entity that sells, or seeks to sell, any kind of goods or services to Cisco, including the supplier’s employees, agents and other representatives. Questions concerning this policy may be directed to the Cisco Ethics Office at [cobc@cisco.com](mailto:cobc@cisco.com).

## We Acknowledge and Abide By This Policy

As a Cisco Supplier, we are expected to acknowledge this policy and to apply it in all dealings with, and on behalf of, Cisco. We understand that our failure to sign and return the Ethics Certification Form (a part of Cisco’s Supplier qualification package) may result in our disqualification from consideration for business, and/or future business, with, Cisco.

We will be fully responsible for ensuring that any subcontractors, agents or other third parties that we employ in our work for Cisco, as permitted by our agreement with Cisco, will act consistently with this policy.

## We Follow the Law

As a Cisco Supplier, we will comply with all laws, regulations and policies applicable to us and our dealings with Cisco, including all applicable government contractual requirements, which flow down to us through our contracts with Cisco. This includes, but is not limited to, applicable U.S. Small Business rules and regulations, Affirmative Action and Equal Employment Opportunity rules and regulations, and the rules regarding suspension and debarment of companies from doing business with the U.S. Government and other similar laws and regulations applicable in other jurisdictions.

## We Understand Cisco’s Policy Concerning Inside Information

If we are aware of material, non-public information relating to Cisco or its business, we may not buy or sell Cisco securities or engage in any other action to take advantage of that information, including passing that information on to others. In addition, if we are aware of material, non-public information about any other company, including Cisco customers, suppliers, vendors or other business partners, that we obtained by virtue of our interaction with Cisco, then we may not buy or sell that company’s securities or engage in any other action to take advantage of that information, including passing that information on to others.

## We Understand Cisco's Policies Related to Kickbacks, Favors, Gifts, and Entertainment

As a Cisco Supplier, we will not offer, promise or provide to any Cisco employee a kickback, favor, cash, gratuity, entertainment or anything of value to obtain favorable treatment from Cisco. Cisco employees are similarly prohibited from soliciting such favors from us. This prohibition extends to the offering, promising or giving of any favors to any family members of both our and Cisco employees or with any other persons with whom we have or Cisco employees have significant personal relationships in exchange for obtaining or retaining Cisco's business.

As long as a gift is not intended to obtain favorable treatment from us, and does not create the appearance of a bribe, kickback, payoff or irregular type of payment, or otherwise raise any potential conflicts of interest, Cisco employees may accept a gift from a Supplier as long as all the following elements exist:

- The gift is \$100 or less in value for tangible gifts or \$200 for intangible gifts (such as event tickets, etc.);
- public disclosure would not embarrass Cisco;
- acceptance is consistent with Cisco business practices, and;
- acceptance of the gift does not violate any applicable law.

Furthermore, Cisco employees are prohibited from accepting initial public offering (IPO) stock from us, as a Supplier.

## We Avoid Conflicts of Interest

As a Cisco Supplier, we will not enter into a financial or any other relationship with a Cisco employee that creates any actual or potential conflict of interest for Cisco. We understand that a conflict of interest arises when the material personal interests of the Cisco employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed and corrected. Even the appearance of a conflict of interest can be damaging to Cisco and to us, as the Supplier, and are to be disclosed and approved in advance by Cisco management.

## We Avoid Unfair Business Practices

As a Cisco Supplier, we will not fix prices or rig bids with our competitors. We will not allocate customers or markets with our competitors, or exchange current, recent, or future pricing information with our competitors. We will otherwise comply with all applicable antitrust and competition laws.

## We Provide Quality

As a Cisco Supplier, we will supply product that conform in all respects with the requirement of our contracts with Cisco including, in particular, all applicable quality requirements.

## We Act in Accordance with Cisco's Global Anti-Corruption Policy

As a Cisco Supplier, we understand our obligation to maintain the highest standards of integrity in all business interactions. Any and all forms of corruption, such as bribery, extortion or embezzlement, are strictly prohibited. We will act consistently with Cisco's Global Anticorruption Policy, available for review on the Cisco website at [http://www.cisco.com/legal/anti\\_corruption.html](http://www.cisco.com/legal/anti_corruption.html) or by contacting [publicsectorcompliance@cisco.com](mailto:publicsectorcompliance@cisco.com).

## We Avoid Political Contributions and Charitable Donations on Cisco's Behalf

As a Cisco Supplier, we are not authorized to make any type of political contribution or charitable donations on Cisco's behalf.

## We Avoid Unauthorized Lobbying on Cisco's Behalf

As a Cisco Supplier, we are not authorized to undertake any type of lobbying or other similar representative efforts on Cisco's behalf before any kind of government entity, official or body or representative without the express consent of Cisco's Global Policy and Government Affairs Group and written agreement. We will contact the Public Sector Compliance office regarding such matters at [publicsectorcompliance@cisco.com](mailto:publicsectorcompliance@cisco.com)

## We Speak Up About Ethical Concerns

As a Cisco Supplier, we will promptly notify the Cisco Ethics Office regarding any known or suspected improper behavior by us relating to our dealings with Cisco, or any known or suspected improper behavior by Cisco employees or agents.

### By Telephone

North America	Toll Free	877-571-1700
Outside of North America	Reverse Charge	770-776-5611

- Tell your local telephone operator that you would like to place a reverse charge call to the United States and give the following number: 770-776-5611.
- When the operator asks for your name, you can use "Cisco Systems" as your "name" if you want to remain anonymous.

### By Email

[ethics@cisco.com](mailto:ethics@cisco.com) - Use this email address to communicate concerns or for general inquiries to the Ethics Office.

[cobc@cisco.com](mailto:cobc@cisco.com) - Use this email address to ask questions about the Supplier Ethics Policy, the Cisco Code of Business Conduct, or to report possible violations.

[auditcommittee@cisco.com](mailto:auditcommittee@cisco.com) - Use this email address to communicate concerns to Cisco's Audit Committee.

### Anonymously

If you prefer to remain anonymous, you can mail a letter to the Audit Committee at:

Cisco Systems Audit Committee  
105 Serra Way, PMB #112  
Milpitas, CA, USA 95035