



# 2017 Code of Business Conduct



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## What's new

The purpose of this section is to provide a quick list of “what’s new” in terms of significant policy changes this fiscal year. While you may navigate to that particular section by clicking the links below, it is still our expectation that you review the COBC in its entirety.

- [I Understand our Gifts, Travel and Entertainment \(GTE\) policy](#)
- [Conflict of Interest \(COI\) policy](#)
- [Data Privacy and Protection \(DPP\) policy](#)

## Chuck Robbins, CEO

Hi Team,

As our CEO, I have never been more excited about our future. To drive our own success – and that of our customers – we will have to drive innovation and new capabilities at a pace that we have never experienced, and be willing to change where needed.

One thing that will not change, however, is our long-standing commitment to maintaining the highest standards of business and professional conduct and compliance. Our customers, partners, and stakeholders around the world trust us, and the products and services that we deliver, because we consistently uphold strong values.

The Code of Business Conduct, or COBC, illustrates and reinforces our values and should be used as a tool to help guide you in making decisions and resolving issues you may encounter in your role. It is designed to be a year-round resource, and I encourage you to refer to it often.

If you ever have questions about the right thing to do, or feel that the COBC is being violated, I ask that you speak up – talk with your manager, contact [Ethics@Cisco](mailto:Ethics@Cisco) or [Cisco Legal](#). You may also share concerns anonymously through the Ethics Web form, or the multi-lingual Cisco EthicsLine phone service.

It is absolutely critical for all of us at Cisco to adhere to the highest ethical standards. We owe it to our customers, partners, shareholders, and each other. Thank you for being a part of Cisco, and for continuing to uphold our strong values!

Sincerely,



**Chuck Robbins**

CEO



**“Chuck Robbins - COBC”** [Transcript](#)

## I Am Ethical

Innovative ideas, emerging technologies, strategic acquisitions – we work in an industry where the pace is fast and change is constant. But some things will never change, like our commitment to doing business honestly, ethically and with respect for one another. At Cisco, we put our values into practice every day. Doing the right thing is just part of our DNA.

### So how do I know if I need to act, when a situation isn't clear?

#### **Make good choices.**

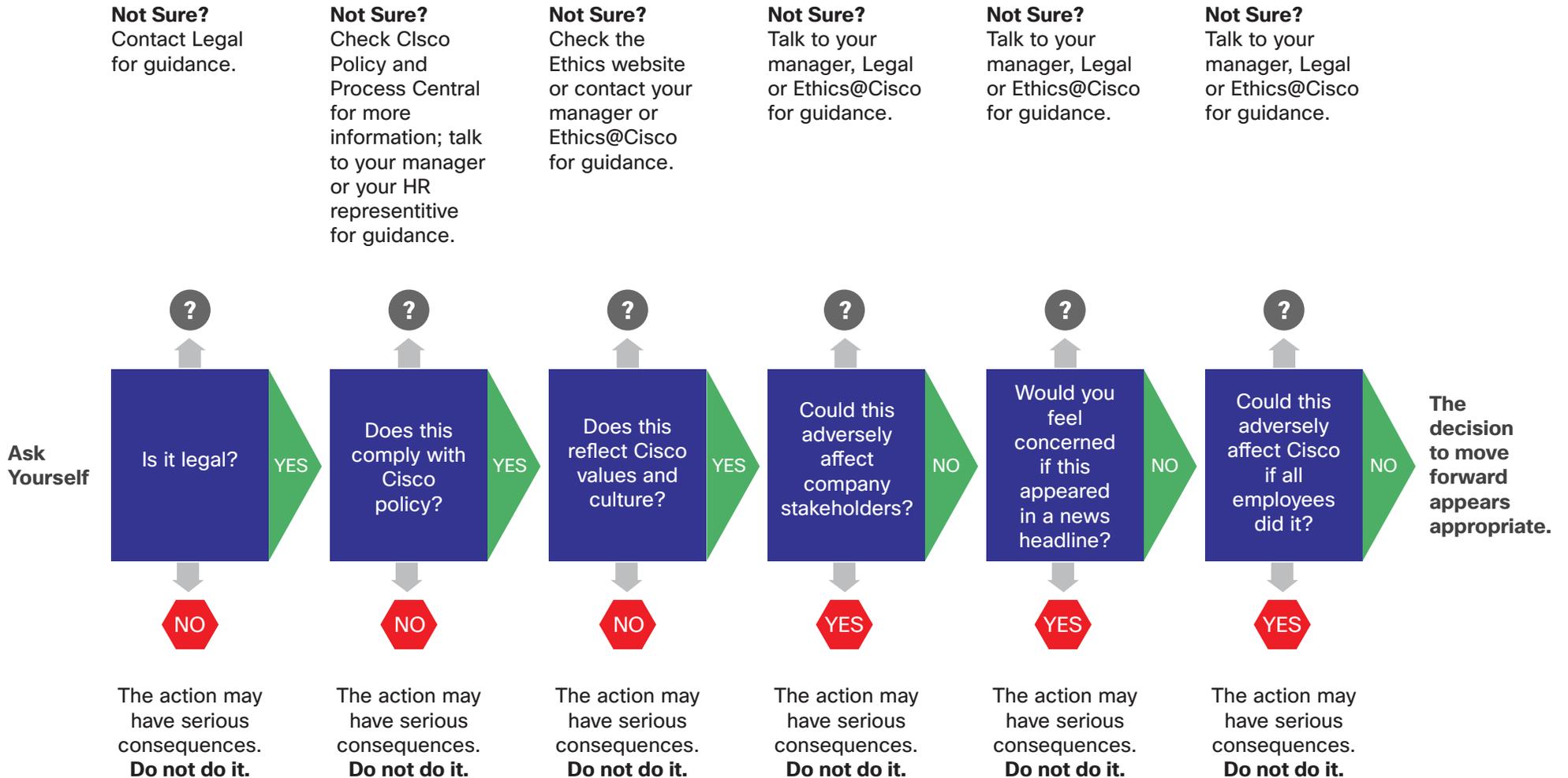
When you are faced with an ethical dilemma, you have a responsibility to take action. It may seem easier to say nothing or look the other way, but taking no action is, in itself, an action that can have serious consequences. Speak up if you see or suspect activity that violates our COBC. As we continue to grow and innovate, you will be helping to further our mission while preserving our core values.

Our continued success depends on your ability to make decisions that are consistent with our core values. Regardless of the situation, exercise total honesty and integrity in everything you do. As an employee, you are responsible for complying with all applicable laws and regulations in each country in which we do business and for knowing and complying with our COBC and other company policies. Violations of the COBC are subject

to discipline, which may include termination of employment. Your individual commitment to doing the right thing will strengthen our reputation as a trusted global brand.

**TIP:** Use the Ethics Decision Tree to assist you in determining the best course of action.

# “Ask yourself” – Ethics Decision Tree



This Decision Tree can be a useful tool when you are faced with a difficult decision.

# I Know the Code

At Cisco, we believe that long-term, trusting business relationships are built by being honest, open and fair. But sometimes situations arise where the right decision isn't completely clear.

## So how does the COBC help me?

### **Our COBC helps you navigate.**

It is a user-friendly resource that you can rely on to help determine what's appropriate when it comes to acting with integrity in the workplace.

### **The Code promotes:**

- Honest and ethical conduct in all relationships
- Full, fair, accurate, timely and understandable disclosure in public reports and documents
- Protection of all confidential and proprietary information
- Compliance with applicable governmental directives, laws, rules and regulations
- Prompt internal reporting of any violations of the COBC
- Accountability for adherence to the COBC by every Cisco employee

### **The COBC applies to everyone at Cisco worldwide.**

The COBC applies to all Cisco employees, subsidiaries and members of our Board of Directors. We also seek to do business with suppliers, customers and resellers who adhere to similar ethical standards. The COBC is monitored and updated by [Ethics@Cisco](mailto:Ethics@Cisco).

### **No one has the authority to make you engage in behavior that violates the COBC.**

You also have a responsibility to watch for potential violations of the COBC and to report them, whether they occur inside Cisco or through external dealings. Refer to "[I Share My Concerns](#)" for guidance on how to report your concerns.

### **The COBC is extensive... but not exhaustive.**

Because it's not possible to address every situation, we rely on you to exercise good judgment in your decision making and to ask for help when you have questions or concerns that are not addressed in the COBC.

### **Cisco continually monitors laws and regulations worldwide.**

We trust our employees to follow the spirit of the law and to do the right ethical thing even when the law is not specific. In some cases, a country's local laws may establish requirements different from our COBC. If a local law conflicts with our COBC, we follow the local law. However, if a local business practice conflicts with our COBC, we follow our COBC. When in doubt, ask for help.

Waivers for any part of the COBC must be submitted to and approved by [Ethics@Cisco](mailto:Ethics@Cisco). Waivers granted to executive officers or members of Cisco's Board of Directors must also be approved by the Board and will be publicly disclosed by appropriate means, along with the reasons for granting the waiver.

**Annual certification of the COBC and other supplemental code(s) and guidelines is required.**

CEO Chuck Robbins and the Board of Directors require all employees to review, understand, certify and comply with the COBC. You will be sent notifications directing you to complete your certification of the COBC. Employees with certain roles and responsibilities may also be required to complete additional certifications and training.

As part of the on-boarding process, new hires are required to complete the COBC certification and any other relevant supplemental codes and mandatory training when they join Cisco. Thereafter, new hires are required to participate in the annual COBC certification.



What if...

**What if I have a concern with the COBC or have reservations about doing my certification?**

You should discuss any concerns with your manager, Human Resources or [Ethics@Cisco](mailto:Ethics@Cisco). Regardless of your COBC certification status, you are always obligated to follow the policies contained in it. Completion of the COBC certification is a condition of employment at Cisco.

**Why are Cisco employees required to certify the COBC every year?**

The COBC is regularly updated based on the dynamic business environment, changing laws and employee feedback. You are required to certify every year to ensure you are familiar with the most recent COBC.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*



Tools/Resources

- [Federal Sales Resources](#)
- [Global Anti-Corruption E-Learning](#)
- [Anti-Corruption and Bribery Policy](#)

## I Share My Concerns

I understand my responsibility, as a Cisco employee, to do the right thing and to share my concerns when I see or suspect something that could harm the company. As an employee, you have an obligation to speak up promptly about anything you believe, in good faith, may constitute a violation. We also encourage you to come forward with situations that “just don’t feel right”.

### What’s the best way to ask or report a concern?

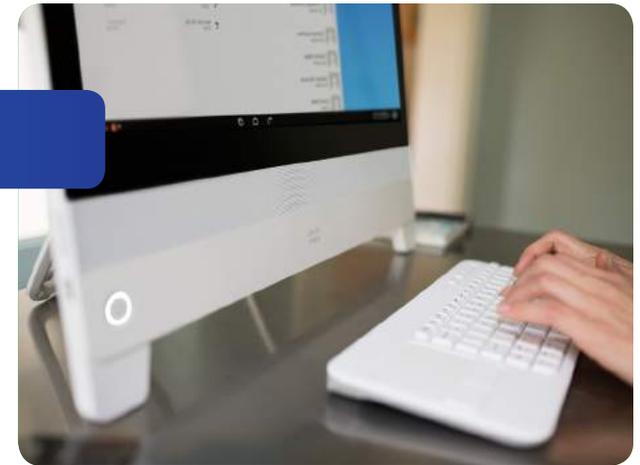
You can always start by talking with your manager, a [Human Resources \(HR\) representative](#) or [Legal](#). They have a responsibility to listen and help. Cisco does not tolerate retaliation against an employee for a question or report of misconduct made honestly and in good faith. Retaliation against an individual for a question or report of a COBC violation is in itself a COBC violation.

If you do not feel comfortable talking with your manager or HR, or don’t feel the outcome resolved the issue, please contact [Ethics@Cisco](mailto:Ethics@Cisco). The [Ethics Office](#) is available to all employees, customers, partners, shareholders and other stakeholders who

wish to raise concerns. The [Ethics Office](#) manages all inquiries promptly and confidentially, to the extent possible by law.

#### However you choose to share your concern, we will address it promptly.

Cisco strives to respond to policy violations consistently. Depending on the type of issue, the right organization(s) will get involved. It may be the [Ethics Office](#), [Legal](#), [Human Resources](#) or other organization. During investigations, employees are required to cooperate and tell the truth. Failure to do so may result in disciplinary action, up to and including termination of employment.



Cisco provides several *confidential* ways to get help with a question or concern.



“Trust Your Gut” [Transcript](#)

## Ask or Report

You can confidentially contact [Ethics@Cisco](mailto:Ethics@Cisco) by:



### EMAIL

- Ethics Office: [Ethics@Cisco.com](mailto:Ethics@Cisco.com)
- Audit Committee of the Board of Directors: [auditcommittee@external.cisco.com](mailto:auditcommittee@external.cisco.com)



### ONLINE

- Cisco [Ethics Web Form](#), for Cisco employees, non-employees and anonymous reporting
- [Ethics Case Creation and Tracking Tool](#)



### PHONE

The multilingual [Cisco EthicsLine](#) is available 24 hours a day, seven days a week, worldwide, with country-based, toll-free phone numbers. The EthicsLine is staffed by a leading, third-party reporting service. You have the option to remain anonymous\* when you call. However, the investigation may be hindered if the investigator is unable to contact you for further information.

**\*Please note:** Some countries do not allow such concerns to be reported anonymously.



### REGULAR MAIL

Questions and concerns regarding accounting, internal accounting controls or auditing matters (or other related issues) can be submitted – confidentially or anonymously – to the Audit Committee of the Board of Directors at the following private mailbox (PMB):

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



What if...

#### What if I reported a concern, but never heard anything back about it?

All matters are addressed promptly, but it may not be possible for the results to be communicated back to you due to privacy/confidentiality requirements.

If the concern was reported anonymously using the [Ethics Web Form](#), you can check on the status of your submission using your Ethics Web Portal login credentials, which you create when using the anonymous site. Follow up questions will also be sent leveraging the portal. Calls to the multilingual [Cisco EthicsLine](#) (managed by a third party) are assigned a case number, so you can remain anonymous to Cisco, but still have the ability to obtain a follow-up on your concern.

#### How do I get in touch with my HR representative or Employee Relations?

To reach your HR representative or Employee Relations, please access [Employee Services Help Zone](#) website.

#### What if I am asked to cooperate in an internal investigation. Must I participate?

Yes. As a Cisco employee, you are obliged to cooperate in internal investigations. Failure to do so may result in disciplinary action, up to and including termination of employment.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*

#### What if my manager tells me to do something that is dangerous or possibly illegal... and I'm afraid of retaliation if I speak up?

In this situation, contact [HR](#), the Cisco [Ethics Office](#) or [Legal](#). Retaliation by your manager or others for a report made in good faith will not be tolerated.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*

## I Respect Others

Our inclusive workplace is welcoming, positive, creative and rewarding – an environment that promotes individual and team expression, innovation and achievement. Employees are offered opportunities to grow personally and professionally. I'm treated with respect and dignity. In return, I recognize my duty to act responsibly, be a team player and treat others with respect and dignity. Valuing everyone strengthens our collaboration and productivity.



### How are Cisco employees empowered to succeed?

#### **You are free to do your job without fear of harassment or bullying.**

Cisco prohibits conduct that singles out an employee or group of employees in a negative way because of their: gender, race, color, national origin, ancestry, citizenship, religion, age, physical or mental disability, medical condition, genetic information, pregnancy, sexual orientation, gender identity or gender expression, veteran status, or marital status or any other basis protected by law. Harassment can take many forms. Any type of harassment is a violation of Cisco philosophy and policies.

Retaliation will not be tolerated and can result in disciplinary action. Refer to "[I Share My Concerns.](#)"

#### **We do not discriminate.**

We are proud of our global workforce. In recruiting,

hiring, developing, and promoting employees – all employment processes – decisions are made without regard to gender, race, color, national origin, ancestry, citizenship, religion, age, physical or mental disability, medical condition, genetic information, pregnancy, sexual orientation, gender identity or gender expression, veteran status, or marital status or any other basis protected by law. We are passionate about preserving our positive culture and ensuring that each individual is treated with respect and dignity as a valued member of the Cisco team.

#### **Our workplace accommodates individuals with disabilities.**

Disabilities may be visible or invisible. Likewise, individuals' abilities and perspectives may not be apparent at first. We welcome the many talents

and innovations of people with disabilities and are committed to removing barriers for our employees, customers, partners, and suppliers.

The [Connected Disabilities Awareness Network](#), a global Employee Resource Organization at Cisco, provides a strong support network for individuals with disabilities. Cisco Employee Relations provides subject matter expertise as they advise and guide managers and employees through Cisco's Accommodation process.

#### **We have a strict drug and alcohol policy.**

Employees are not permitted to use, possess, sell, transfer, manufacture, distribute, or be under the influence of illegal drugs on Cisco-owned or leased property, during working hours, while on company business, or while using company

property. Although certain jurisdictions may allow the prescription or other use of marijuana, this policy also applies to marijuana, which remains illegal under U.S. Federal law. Employees are not permitted to use, possess, sell, transfer, manufacture, distribute or be under the influence of these drugs while on Cisco owned or leased property, during working hours, while on company business, or while using company property. In addition, no employee may report for work, go on or remain on duty while under the influence of, or impaired by, alcohol or these drugs or substances. Alcohol use at company-sponsored events is allowed only with prior [written approval](#) in accordance with the Cisco Global Meetings and

Events policy. All employees who consume alcohol at company-sponsored events are expected to consume alcohol responsibly. Violation of Cisco's Drugs & Alcohol in the Workplace Policy will result in disciplinary action, up to and including termination of employment.

**We are committed to providing a safe and nonthreatening workplace.**

Employees should be familiar with and follow all security and safety guidelines and report any unsafe conditions or accidents. Any acts of violence toward another person or company property should also be reported immediately. We want to foster the kind of

environment where people feel safe and are treated with courtesy and professionalism at all times. For more information, please go to the [Safety, Security & Business Resiliency website](#).

**We provide safeguards for your personal information.**

Cisco respects the privacy rights and interests of all its employees and provides safeguards for the protection of its employees' personal information that is collected, held and used. Everyone must respect the privacy rights of coworkers and handle all employees' personal information in accordance with Cisco's [Global HR Data Protection Policy](#).



What if...

**My manager made a comment that made me feel uncomfortable. Is that harassment?**

You are entitled to work in an environment free from intimidating, hostile or offensive behavior that is subject to legal protection. Not every offensive or critical comment meets those requirements. If you are uncomfortable, please contact Human Resources, the [Ethics Office](#), or Legal for help in determining next steps (also see "[I Share My Concerns](#)" in the COBC).

**What if I receive an email that included offensive jokes or language?**

Jokes that would be reasonably viewed as offensive have no place at Cisco, and should not be sent through company email, regardless of the

intended recipients. You may tell the coworker, who sent the email, that you found the email offensive. You may also notify your manager, Human Resources or the [Ethics Office](#).

**What if I receive a phone call from someone requesting information about a coworker?**

You should not disclose personal or work information about your coworkers to anyone if you are uncertain of the caller's identity. Employee phone numbers, email addresses and reporting structures should never be provided to unknown persons. Recruiters from competitors frequently call Cisco employees pretending to call on behalf of Cisco HR or executives. If you receive a call requesting information, ask to call the person back so you can verify that the call is legitimate.



Tools/Resources

- [Cisco Issue Resolution Process](#)
- [Cisco Alcohol Approval Site](#)
- [Cisco Safety and Security Information](#)

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*

## I Use Resources Responsibly

Cisco counts on me to use good judgment to conserve and safeguard company resources, such as computers, telephones, Internet access, copiers and work supplies. I am committed to using our resources appropriately and wisely.



### What's allowed and what is prohibited?

#### **Company assets are provided for business use.**

Company assets should be used first and foremost for business purposes and to advance our strategic objectives. We each must guard against waste and abuse. Company assets include not only the physical space in which we work, but also other non-physical resources. **You have no expectation of privacy when using the company's facilities or resources**, as they belong to Cisco. Therefore, material transmitted or stored on company resources may be retained or reviewed.

**Note:** *When employees use their personal devices (smartphones, tablets, etc.) for work, they still need to protect any company-related information that is exchanged or stored on those devices (refer to ["I am Trusted with Data"](#)).*

#### **Be respectful and professional when using video and social media tools.**

Cisco empowers employees to use social media to conduct company business, as well as to facilitate collaboration and innovation. We do not block social networking sites. As noted in our [Social Media Policy](#), it's very important to avoid mishandling intellectual property or disclosing any data (refer to ["I am Trusted with Data"](#)) or confidential or restricted information. The rules for proper behaviors outside the internet also apply inside the "online" world. If you are ever unsure, submit a question on the [Global Social Media Community](#) discussion forum or to [internetpostings@cisco.com](mailto:internetpostings@cisco.com).



## Approved

### Business use

Conscientious, lawful and professional use of email, computers and other communications systems for work is acceptable. This includes protecting Cisco's brand. Our copyrighted works (such as documentation, graphics, images, videos, audio recordings, and software) should only be used only for business purposes pursuant to Cisco's policies.

### Limited personal use

Occasional use of company assets for personal (non-commercial) reasons is permitted, within reason, as long as it does not compromise Cisco's interests or adversely affect job performance (yours or that of your coworkers).

**Note:** For Diversity guidance regarding use of company resources for personal belief topics or activities, refer to the *Policy on Use of Cisco Assets for Activities Relating to Employees' Personal Beliefs*.

### Political activities

You may participate in political activities on an individual basis, with your own money and on your own time.

### Proper use of internal communications channels

Cisco internal communications (discussion forums, Jive communities, mailers, etc.) support collaboration and peer relationships. Use of these communication channels should be consistent with the Cisco values of trust, integrity, inclusion, and respect for others.



## Prohibited or Requires Authorization

### Use of Cisco assets for non-company purposes

- Do not borrow or remove Cisco resources from company premises without proper authorization.
- Never use them to support a personal business, consulting effort or outside fundraising activity.
- Even Cisco resources that have been identified as "scrap", garbage or destined for recycling cannot be used for non-company purposes without approval.
- Cisco trademarks should not be used on non-company materials or as part of any domain name that is not registered, used, and controlled by the company.

### Negative impact

Your use of company resources should never result in significant added costs, disruption of business, or any disadvantage to Cisco.

### Unlawful or offensive

Do not access, distribute, download, or upload material that is prohibited by law or contains sexual content; or distribute or upload material containing offensive language, third party copyright protected materials without permission from the owner; or anything that would negatively reflect on Cisco; or derogatory comments about race, gender, sexual orientation, age, or religion.

### Use of Cisco assets for political purposes

- Company Contributions – No assets, including time at work, use of Cisco premises or equipment, or direct monetary payments, may be contributed to a political candidate, political action committee, or ballot measure without the written permission of the Vice President of Worldwide Government Affairs.  
**Note:** Regarding personal political contributions, refer to the "[I Follow the Law](#)" section
- Other Activities or Lobbying – Except incidental use, using company resources to support political activity or lobbying is prohibited unless written permission is obtained from the Vice President of Worldwide Government Affairs.

### Inappropriate use of internal communications channels

- Email and mailers may not be used to solicit illegal or fraudulent activity or enable or encourage another to breach a contract.
- Internal communications channels may not be used for political activities without the written permission of the Vice President of Worldwide Government Affairs.

## ? What if...

### **What if I do personal activities on a Cisco computer or work phone? Is this OK?**

Generally, limited personal use of company resources is permitted as long as there is no significant cost for Cisco, work is not disrupted and the activities do not violate policies or laws.

### **What if I have a side business that has been determined by Cisco to not be a conflict of interest? Is it OK for my clients to leave messages on my Cisco voicemail?**

Business use of company assets is only for Cisco business. Employees are not permitted to use assets to support a second job, self-employment venture or consulting effort.

### **May I use a Cisco email community mailer to share the use of my subscription-based account for a paid service with other employees?**

No, you may not offer the use of your subscription account to others via Cisco community mailers. Doing so may violate the terms of the subscription and possibly create legal ramifications for you and Cisco.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*



## Tools/Resources

- [Building Email Mailer Distribution Policy](#)

## I Avoid Conflicts of Interest

Doing what's right for Cisco is important. It means avoiding situations that create – or appear to create – a conflict between my personal benefit and Cisco's interests.

### What's a Conflict of Interest?

A conflict of interest occurs when an employee's personal activities or relationships interfere with his or her objectivity in doing what is best for the company. Conflicts of interest, in fact or appearance, can also decrease shareholder value and expose Cisco to legal and/or reputational liability. Cisco employees are expected to diligently avoid such conflicts.



# The five most common situations that can lead to a Conflict of Interest (COI) are:

## 1) Outside Business Interests

- External paid projects or outside employment ([disclosure here](#))
- Advisory or consulting opportunities ([disclosure here](#))
- Developing new products, including inventions and writings ([disclosure here](#))
- Outside selling or servicing of Cisco equipment (not approved)
- Ownership or investing in a company that has a connection to Cisco ([disclosure here](#))

## 2) Family and Friends

- Interacting with them as Cisco suppliers, contractors, consultants, partners, customers or competitors
- Hiring them into Cisco

Contact the [Ethics Office](#) about these situations.

## 3) External Boards

- For-profit, technical and government or any public sector boards ([board disclosure here](#))
- Professional association and non-profit ([disclosure here](#))

## 4) Communications

- Speaking engagements (check with your manager)
- Endorsements ([guidelines](#))
- Personal references for current or former Cisco employees (see the [Reference and Verification of Employment Policy](#))
- Books and Publication opportunities ([Publication Policy](#))

## 5) Gifts, Travel and Entertainment

Since there are a variety of valid business scenarios where gift/entertainment expenses are exchanged, where related laws around the world are applicable, there are policies/tools defined for these cases.

Giving: [Gifts, Travel and Entertainment \(GTE\) Disclosure Tool](#)

Receiving: [Gifts Disclosure Tool](#)

Descriptions and required actions for the first four COI categories are detailed in the [Cisco Conflicts of Interest, External Boards and Investments Policy](#).

Details about gifts, entertainment and hospitality are provided in the [Cisco Gifts, Travel and Entertainment Policy](#). Refer to these policies if your outside activity, situation or relationship has the potential of creating a conflict of interest or the appearance of one.

It's not possible to list every potential COI situation. If you are not sure, contact the [Ethics Office](#) for assistance.





## What if...

### **What if I develop a product I think would be beneficial for Cisco? Can I become a supplier to Cisco?**

Under every Cisco employee's [Proprietary Information and Inventions Assignment Agreement](#), Cisco owns the rights to any invention that relates to Cisco's current or anticipated research and development interests, and employees are required to disclose all such inventions to Cisco. If the situation involves a product developed prior to Cisco employment, because this situation could cause divided loyalty or the appearance of a conflict of interest, Cisco will generally not purchase products or services from our employees, with rare exceptions. Before considering such an arrangement, you must obtain written permission from both the [Ethics Office](#) and the Cisco vice president for your organization.

### **What if one of my relatives or a close friend works for a Cisco customer or supplier? Do I need to notify someone about this relationship?**

Even if you do not directly work with your family member or friend, any situation that has even the appearance of a conflict of interest should be disclosed to Cisco. If your relative/friend's job and your job responsibilities have the potential of intersecting, you need to disclose this relationship to your manager and the [Ethics Office](#).

### **What if my friend's daughter wants to apply for a position in my reporting chain? Can I forward her resume directly to the hiring manager (who is my direct report)?**

Some of our best hires come from employee referrals. However, to eliminate the appearance of a conflict of interest, tell your friend's daughter to apply through the general application process – you simply don't want the hiring manager to feel any pressure to hire an individual for any reason other than the belief that the person is the best fit for Cisco. Contact the [Ethics Office](#) or access the Employee Service Helpzone website for more guidance, if needed.

### **What if a local non-profit is looking for someone to develop an information system? Is it OK for me to volunteer or work "on the side" for them?**

It depends on the non-profit organization and the type of information system work that you would be performing. To avoid any potential conflict of interest issues, contact the [Ethics Office](#) for help.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*



## Tools/Resources

- Receiving: [Gifts Disclosure Tool](#)
- Giving: [Gifts, Travel and Entertainment Tool](#)
- [Conflict of Interest Disclosure](#) (Outside Employment, Family Member and Invention, product and Intellectual Property)
- [External Board Participation Disclosure](#) (non-profit, technical advisory or public/government boards)
- [Investment Disclosure Tool](#)
- [Legal Contacts](#)
- [Legal Policies at a glance](#)
- [Internal Web Form](#)
- [Cisco Employee Referral Program](#)

## I Understand our Gifts, Travel and Entertainment Policy

Cisco encourages our employees to build relationships with customers, vendors, partners, service providers and/or suppliers, and part of that goodwill may involve providing meals, gifts, entertainment or invitations to events. It is important that in giving or receiving anything of value as part of an appropriate business relationship, it is conducted transparently in the right way so that it does not create any perception of unethical behavior or violate applicable laws, or Cisco or third-party policies or principles. Unapproved expenses will not be reimbursed.

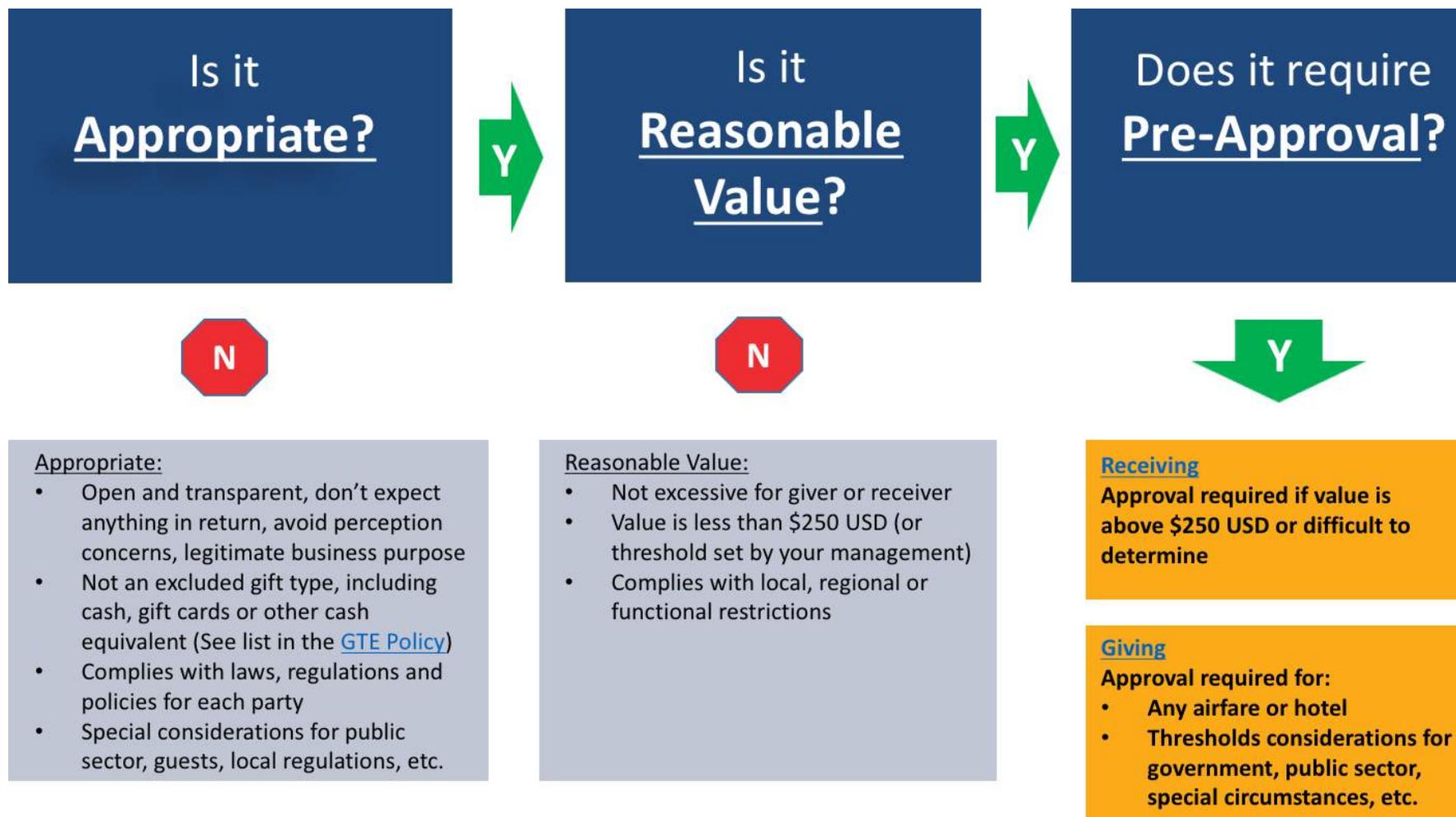
All employees should familiarize themselves with Cisco's [Gifts, Travel and Entertainment \(GTE\) Policy](#) to learn the right process to give or receive an **appropriate** business offering. It starts with determining whether the offering is appropriate, whether it is **reasonable value**, and whether it requires **disclosure and pre-approvals**.

Here is guidance to help with the determination, but you should always check the GTE Policy and consult with your manager to understand any special requirements applicable to your function or region.



**“It’s just a mooncake...”** [Transcript](#)

## “Ask yourself” – GTE Decision Tree





## What if...

### **What if I instruct the partner to give the gift to the customer instead of me?**

The GTE policy applies whether an offering is provided directly or indirectly (including through a third party or an agent on behalf of a party) and whether using Cisco, third-party or personal funds.

### **What if I can't tell whether the customer is a private or public sector customer?**

The GTE policy applies to recipients from both private or public sector state-owned entities. The offering still needs to be appropriate, reasonable value and may need to be pre-approved. Check out the [State-Owned/Controlled Entities Jive site](#) to accurately identify whether a customer is from a state-owned/public sector entity to avoid a violation.

### **What if the value of the gift is less than \$250 USD?**

Even if the value of the offering is less than \$250 USD, it still may be subject to a lower threshold established by your management, or regional or local laws, or limited by the policies or rules of the third party or if the customer is a public sector US official. Regardless of value, the offering still needs to be appropriate (as just one example, no value can be given to unduly influence a business award or favor). Many governments and some companies have restrictions on gift receipts below \$250 USD.

If disclosure is required under the [GTE policy](#), use the following GTE tools: if the offering is given by a Cisco employee, disclosure would be made through the GTE Disclosure Tool; if the offering is received by a Cisco employee, then disclosure would be made through the [Receipt of Gifts Disclosure Tool](#). When in doubt, simply contact [corporate\\_compliance@cisco.com](mailto:corporate_compliance@cisco.com) before giving anything of value and [Ethics Office](#) before receiving items of value.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*



## Tools/Resources

- Receiving: [Gifts Disclosure Tool](#)
- Giving: [Gifts, Travel and Entertainment Tool](#)
- [U.S. Public Sector Gift Rules](#)
- [Gifts, Travel and Entertainment Policy](#)
- [Global Anti-Corruption and Bribery Policy](#)
- [Global Anti-Corruption Policy by Cisco Partners](#)

# I Am Trusted with Data

We are trusted as a leader in world-changing technology. Each of us is responsible for protecting the confidentiality, integrity, availability, and privacy of confidential and proprietary information, whether it belongs to Cisco, our employees, our customers, vendors, partners and others with whom we do business.

## We are Trustworthy, Transparent, and Accountable

We are trustworthy, transparent, and accountable in how we secure our company and our products, in order to earn the verifiable trust of our customers, partners, shareholders, and employees. At Cisco, security is everyone's business, and you must play a part to enable Cisco's strategy of aligning business and technology priorities to ensure pervasive security. This includes information security, privacy for personally identifiable information, and data protection.

To help protect Cisco and third party data, you must follow Cisco's privacy and data protection policies, which among other things require that the collection, access, use and sharing of data, including personally identifiable information, be only for legitimate, authorized purposes (e.g., relevant to fulfill your assigned job responsibilities).

## How Do We Protect Data?

We earn and maintain our customers' and employees' trust by adhering to **security, data protection, and privacy policies** and practices aligned to global policy frameworks. Employees are expected to apply the enterprise-wide **Cisco data taxonomy** to the data they handle. The [Data Protection Policy](#) establishes a data lifecycle and a framework for classifying and protecting data based on its level of sensitivity, value, and criticality. A federated data protection model provides additional requirements set out in related policies, such as the [Global HR Data Protection Policy](#), for specific data sets or functions. Employees must understand **any additional data protection requirements** relevant to their organization or the data they handle, and complete regular security education and awareness.

Cisco has implemented and enforces security policies and controls on all electronic and computing



devices used to conduct Cisco business or interact with internal networks and business systems, whether owned or leased by Cisco, an employee, or third party. Subject to applicable law, Cisco may inspect or monitor at any time, all messages, files, data, software, or other information stored on these devices or transmitted over any portion of the Cisco network or at Cisco facilities in order to ensure compliance with Cisco policies.

## Incident Reporting

An incident is any situation where protected data may be lost, stolen, or otherwise improperly handled. It may also include attempts (failed or successful) to gain unauthorized access to a system or its data. Just as you take steps to protect your own information, you must also protect Cisco's information by reporting any known or suspected incident involving threats to human resources data, customer data, and proprietary information.

All employees must report any and all incidents upon discovery: [www.in.cisco.com/security](http://www.in.cisco.com/security)

## Data Protection Agreements

Cisco employees must comply with a variety of Cisco policies and agreements related to data protection, which include nondisclosure agreements and contractual requirements placed on Cisco by our customers and other third parties. Before sharing data with third parties, employees must have authorization and disclose only what is necessary (“need to know”). Data entrusted to Cisco by a third party must not be used or copied unless its use is authorized in writing and the third party’s data protection requirements have been satisfied.



### What if...

**My e-mail program auto-filled the wrong address, and I disclosed sensitive customer information to another customer by accident.**

#### What should I do?

You should report the incident immediately by selecting “Data Protection & Privacy” – “Submit a data loss incident” in the [CLIP Tool](#). Do not take any further action until you are contacted by incident response teams.

**I need to collaborate with a co-worker on document containing Cisco Restricted data and want to post the document in Cisco Box. Can I?**

No, the Cisco Box platform is approved only for data classified as Cisco Highly Confidential or lower. Review the [Cisco Box usage guidelines](#) for permitted uses. You can also reference the [Content Creation, Management, & Sharing Reference Guide](#) to understand the appropriate solutions to use.

**What if I receive an e-mail or package that contains a competitor’s proprietary data?**

Do not read the document and do not share it with coworkers or your manager. A package should be quickly sealed and secured. Do not forward the email. Contact Cisco Legal immediately and wait for their instructions.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*



### Tools/Resources

- [Security & Trust Organization \(S&TO\)](#)
- [S&TO Policies on Policy & Process Central](#)
- [Data Protection Program](#)
- [Global Data Privacy Office](#)
- [Report an Incident](#)

#### Additional Data Protection Information, by Business Function:

- [Cisco Data Taxonomy](#)
- [Enterprise Records & Information Management \(ERIM\)](#)
- [Cisco Records Management Policy and Retention Schedule](#)

## I Follow the Law

Being a good corporate citizen includes legal compliance. As a global company, we stay on top of laws and regulations as they apply to doing business around the world.

### Which laws are reinforced by the COBC?



#### Market Competition and Doing Business Ethically

##### **Antitrust and competition laws keep the marketplace thriving.**

Antitrust laws encourage competition in the marketplace so that consumers have more choice and benefit from lower prices. Antitrust laws around the world prohibit business practices that reduce competition. For example, antitrust rules forbid agreements between competitors that agree on the prices or other terms on which they will sell products or services or divide customers or markets. Antitrust laws also set rules regarding exclusive dealing, bundling and tying, below cost pricing, preventing or discouraging resellers from discounting, or (in a few countries) discriminating between similarly situated resellers with respect to pricing and promotional payments. The most serious antitrust violations, for example agreements between competitors regarding pricing, can result

in criminal penalties for Cisco and the individuals involved, including fines and imprisonment. Violation of other antitrust rules can lead to high fines and damages, reputational damage, and the possibility of government monitoring of Cisco's business decisions. Cisco is fully committed to competing fairly and complying with antitrust and competition laws in every country where we do business. If you have questions relating to antitrust and competition laws, or if you believe that Cisco, a partner, or a competitor is not in compliance with those laws, you should immediately contact [Cisco Legal](#).



#### Insider Trading and Corporate Confidentiality

##### **Do not trade on "inside" information.**

If you have **material, nonpublic information** relating to Cisco or our business, it is our policy

that neither you, nor any other person or entity, may buy or sell Cisco securities or engage in any other action to take advantage of, or pass on to others that information. This also applies to trading in the securities of another (for example, Cisco customers, suppliers, vendors, subcontractors, and business partners), if you have material, nonpublic information about that company that you obtained by virtue of your position at Cisco. Even the appearance of an improper transaction must be avoided. Please note that trading patterns are closely monitored, and Cisco cooperates fully with government investigations of potential illicit trading.

##### **Even a "tip" is unlawful.**

Cisco employees also are prohibited from tipping off others; that is, passing along inside information to **friends or family** under circumstances that suggest that the Cisco employee was trying to help someone make a profit or avoid a loss. Besides being a form of insider trading, tipping is also a

serious breach of corporate confidentiality. For this reason, you should avoid discussion of sensitive information anywhere that others may hear it, such as in Cisco cafes, on public transportation, or in elevators.

### **Derivatives and hedging transactions are not permitted.**

Cisco employees are also prohibited from trading in any Cisco derivative securities, such as put and call options, regardless of whether the employee has material, non-public information. Cisco's policy also prohibits short selling or engaging in any other forms of hedging transactions in Cisco securities, such as collars or forward sale contracts, because of the divergence it could create between objectives of employees and other shareholders.



## Official Disclosures

### **Information we disclose about our company must be full, fair, accurate, timely and understandable.**

It is critical that our filings with the Securities and Exchange Commission and other governmental agencies are done properly. You may be called upon to provide information for Cisco's public reports. If so, make sure the information is accurate, complete, objective, relevant, timely and understandable to help ensure full, fair, accurate, timely and understandable disclosure in the reports and documents that we file with or submit to government agencies and in other public communications.



## Global Anti-Corruption and Bribery

### **Cisco has zero tolerance of bribery and corruption.**

It is paramount to act with the utmost integrity, honesty and transparency, and comply with regional and national anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA). We will forgo business opportunities rather than pay **bribes**, and we will support our employees when faced with losing sales owing to refusal to pay bribes.

Specifically, we do not promise, offer, demand, give or accept any advantage (which can include anything of value, not just cash) as an improper inducement for an action that is illegal, unethical or a breach of trust. Check Cisco's [Global Anti-Corruption and Bribery Policy](#) or contact [Ethics@Cisco.com](mailto:Ethics@Cisco.com) for assistance.

### **Gifts, Travel and Entertainment**

Regarding acceptable versus prohibited business gifts, refer to the "[I Understand our Gifts, Travel and Entertainment Policies](#)" section. Offers to pay for guest travel or hospitality must be made in accordance with the [Anti-Corruption and Bribery](#) and [Gifts, Travel and Entertainment](#) policies.

### **Our Partners' Behavior**

Cisco also seeks business partners who share our values for transparency and honesty in all business dealings. We require our business partners adhere

to our [Anti-Corruption Policy for Partners](#). Cisco has training available for its partners. If you engage or work with suppliers, you should be aware that they are expected to abide by our [Supplier Code of Conduct](#) and [Supplier Ethics Policy](#), as well as any relevant guiding principles, to help ensure compliance.



## Individuals' Political Contributions

Under United States election laws, some employees, including Cisco corporate directors and officers, may be required to obtain pre-approval via Cisco's [U.S. Political Contribution Tool](#) before making certain kinds of campaign contributions. See Cisco's [U.S. Public Sector Ethics Code](#) for more information. For policies regarding use of company assets for political activities, refer to the "[I Use Resources Responsibly](#)" section.



## Copyrights

### **Be sure that you have authorization before you use third-party copyrighted material.**

It is against Cisco policy – and, in fact, may be unlawful to copy, reproduce, digitize, distribute, broadcast, use, or modify third-party **copyrighted material** in the development or as part of Cisco products, promotional materials, written communications, blogs and other social media, unless you first obtain written permission from the copyright holder.

This requirement may apply regardless of whether the end product is for personal use, Cisco internal use, or other use. It is also against our policy for employees to use Cisco facilities, equipment, and networks to make, obtain or distribute unauthorized copies of third-party copyrighted material (including acquiring or sharing third party movies, TV programs, software and music through the Internet and peer-to-peer sites). Improper use of copyrighted material can lead to civil and criminal actions. If you have questions, please contact Legal.

## Personal Data Privacy

### **Many countries have privacy or personal data protection laws.**

We are committed to protecting the reasonable privacy expectations of everyone with whom we do business, including our customers, vendors/partners, visitors to our websites, and employees. If you have access to personal data (including data hosted by a third party) as part of your work, it is important that you collect, access, use, or share such data only to the extent necessary and relevant to fulfill your assigned job responsibilities and in accordance with [Cisco policies](#), local laws and regulations. If questions arise, consult the [Privacy Team](#).

## Export Regulations

### **All employees are responsible for abiding by US and International export laws.**

The export of Cisco products, with appropriate licenses, is permissible to most civilian/commercial end users located in all territories except embargoed destinations and countries designated as supporting terrorist activities as well as to sanctioned entities even when not located in embargoed destinations. For additional information on how you can support Cisco's compliance obligations, please visit the [Global Export Trade \(GET\) group](#) website.

## Import Regulations

All employees are responsible for abiding by import laws. The import of products on behalf of Cisco, with appropriate customs declarations and licenses, and adhering to destination customs regulations, Cisco policies and procedures, is permissible in most territories. Exceptions include personal effects, shipments to embargoed destinations and countries designated as supporting terrorist activities. For additional information on how you can support Cisco's import compliance obligations, including additional country-specific restrictions, please visit the [Global Customs](#) website.

## Anti-Money Laundering Laws

Cisco and its subsidiaries are committed to participating in international efforts to combat money laundering and the funding of terrorist and criminal activities. This is also embedded in Cisco's legal obligations across various jurisdictions. In some countries Cisco employees are personally liable to contribute to the prevention of money laundering and they should note the importance of adhering to Cisco's Anti-Money Laundering (AML) and Terrorist Financing policies and procedures where relevant. Some of Cisco's obligations in this regard include: maintaining AML policies and procedures and conducting customer screening to ensure Cisco is not transacting with individuals or entities on U.S. and international sanctions lists.

### We exercise our legal rights when necessary

Cisco reserves the right to contact legal authorities when there is a reasonable belief that a crime has been committed by a current or former employee connected to the Cisco workplace.

If a local law conflicts with our COBC, we follow the local law; however, if a local business practice conflicts with our COBC, we follow our COBC. When in doubt, ask for help.



## What if...

### **What if I become aware of Cisco’s quarterly earnings results before they have been publicly announced? May I purchase company stock, knowing that information?**

No. This information is considered “material, nonpublic information,” and the purchase of Cisco stock would be a violation of Cisco policy and a potential violation of federal securities laws.

### **A vendor presented a new product it plans to introduce soon. My team agreed the product would not be useful for Cisco, but I think it will be a real breakthrough for other industries. Can I buy stock in the vendor’s company before the product launch?**

No, you may not buy this stock until information about the new product is known to the public. Otherwise, it would be considered insider trading, which is illegal.

### **A consultant we use to facilitate government relations in a particular locale added a significant ‘facilitation’ fee to her charges to Cisco. I am concerned she may intend to pass along this extra money to local officials. What should I do?**

Cisco does not condone the bribing of government officials, either directly or through a third party, and in fact Cisco can be legally liable if there are “red flags” that bribery may be occurring. If you suspect this consultant may pass along this payment inappropriately, contact the [Ethics Office](#) or [Cisco Legal](#).

### **What if I am forced to make a decision between obeying a local law and complying with the COBC?**

The law always takes precedence over the COBC. If in doubt, check with the [Ethics Office](#) or Legal for help.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*



## Tools/Resources

### Anti-Corruption:

- [Global Anti-Corruption Training](#)
- Receiving: [Gifts Disclosure Tool](#)
- Giving: [Gifts, Travel and Entertainment Tool](#)
- [Gifts, Travel, and Entertainment \(GTE\) Jive Site](#)

### Cisco U.S. Public Sector:

- [U.S. Federal Sales \(Ethics Code and Compliance Guide\)](#)
- [U.S. Public Sector Gift Rules](#)
- [U.S. Political Contribution Tool](#)

### Export Resources:

- [Cisco Global Export and Technology Control Group](#)

### Privacy Resources:

- [Privacy Team](#)

## I Am Accurate and Ethical with Our Finances

As a Cisco employee, we all have an obligation to promote integrity throughout the organization, with responsibilities to stakeholders inside and outside of Cisco. This includes being aware of and adhering to internal financial and accounting policies. The timely, accurate handling and reporting of financial information is not only required by law, but it is also at the core of our commitment to do business honestly and ethically.



### I don't work directly with financial data or activities, so does this apply to me? Yes.

#### **Responsibly and Accurately Manage Cisco Finances.**

All Cisco employees are personally responsible for any company-related funds that they control. Company funds must only be used for Cisco business purposes. Every employee must ensure we receive good value and maintain accurate and timely records for each expense. This includes anything purchased from third parties. It is a violation of the COBC to hide, falsify, misrepresent or alter documents or data regarding the use of Cisco funds.

#### **Follow Cisco's expense reporting policies.**

Cisco employees are required to comply with Cisco's Global Expense and other related policies, such as Travel, Meetings & Events, Procurement, etc. In particular, employees must submit all business expenses in approved tools where available (e.g. Oracle iExpenses) or complete a manual claim form where automated tools are not available. Cisco

employees are required to accurately categorize expenses and submit them in a timely manner (within 30 days of incurring the expense). Failing to report a transaction, mischaracterization of a transaction, creation of false or inaccurate documentation, such as claiming non-business or unapproved related expenditures, is strictly prohibited.

#### **Accurately Record All Sales Transactions.**

The [Global Bookings Policy](#) defines the criteria for sales transactions to be recorded as booked and the [Non-Standard Deal Policy](#) sets for the processing and approval requirements for any non-standard sales terms. Exceptions to and deviations from these or other revenue recognition controls are highly restricted and must be approved by the appropriate Cisco governing body. Violations of these controls, such as unauthorized side commitments or "soft" bookings are a serious matter.

#### **Off Book or "Parked" Funds.**

Cisco is required to properly maintain its books and records in order to accurately and completely reflect the company's transactions and financial position. Off-book funds are any funds inappropriately established or retained in a non-Cisco account where the use of the funds continues to be directed by Cisco employees without proper transparency, authorization, documented terms and conditions, and appropriate accounting treatment on Cisco's books and records in accordance with the company's policies. The establishment, retention or use of off-book funds and any attempt to circumvent or manipulate processes, systems or data associated with off-book funds are considered serious violations.

## Employees with Financial Reporting Responsibilities

In addition to the COBC, our CEO, CFO and all Finance Department employees have special obligations and are bound by the [Cisco Financial Officer Code of Ethics](#).

This governing Code includes providing information that is accurate, complete, objective, relevant and understandable. These individuals must reinforce our company's commitment to the fair and timely reporting of Cisco's financial results and condition.

A violation, including failure to report potential violations, of the [Financial Officer Code of Ethics](#) will be viewed as a severe disciplinary matter and may result in personnel action, including termination of employment. If you believe that a violation has occurred, please contact [Cisco Legal](#), the [Ethics Office](#), or the Audit Committee of the Board of Directors. As with the COBC, it is against Cisco policy to retaliate against an employee for good-faith reporting of any potential or actual Code violations.

### What if...

#### **What if my manager is exerting pressure to “make the numbers work”?**

Your responsibility is to be honest and accurate. If you feel pressured to do otherwise, contact the [Ethics Office](#), Legal or Human Resources. You may also contact the Audit Committee of our Board of Directors. If you feel uncomfortable going through internal channels, you can call the multilingual Cisco EthicsLine anytime, night or day, worldwide.

#### **What if I am asked to book a deal without a purchase order?**

All deals must be accompanied by a purchase order from a customer. These sales records ensure that our finances are accurate and protect the company from fraud. Refer to the [Global Bookings Policy](#) for the required elements of a purchase order.

#### **What if I am asked to create a deal to sell a product or service to a reseller who I know is not authorized to receive it, or for purposes other than for which a specific discount was given for competitive reasons?**

This could result in product diversion to the “gray market” causing damage to Cisco's legitimate resellers and possible service abuse. If you believe that product/service is being sold outside the approved deal, contact Brand Protection and the [Ethics Office](#).

#### **What if I am asked to structure a deal where the customer can choose only high discounted products?**

Such a situation is called “cherry picking” and is not allowed. This can also result in discount leakage and potential product diversion. Refer to your Finance controller or the [Ethics Office](#) if you believe you are being asked to structure a deal in this way.

#### **What if I have left over budget in a current period and want to use it with a vendor for a future expense?**

Expenses should be paid for in the period in which they are incurred. Attempts to spend unused budget crossing quarters could present a parked fund situation where Cisco's funds are not accurately recorded.

#### **What if I am asked to include extra discounts in a deal to a partner or customer where the discount is intended to be used for future Cisco spend (Product, Services or Software)?**

Cisco employees should not direct the use of funds provided to partners or customers without proper transparency, authorization, documented terms and conditions, and appropriate accounting treatment on Cisco's books and records. Refer to the [Global Revenue Policy for Innovation and Incentive Funds](#) for the required treatment of these transactions.

*For any other questions or concerns, contact the [Ethics Office](#) for assistance.*

## Our Commitment to Integrity

### Customer Experience & Quality Count

I am responsible for understanding how my role ultimately impacts the customer. I will act with a Customer Experience (CX) mindset to better achieve our customers' business goals and desired outcomes, make their interactions with Cisco easier, deliver world-class products, services and solutions, and create an enjoyable overall experience. I agree to follow the [Cisco Quality Policy](#) and the [Cisco Business Management System](#) which describe our commitment to quality and our customers. Please go to the [Cisco Policy and Process Central](#) and [Customer Experience](#) sites for more information.

### Corporate Social Responsibility

**I act in a manner consistent with our Corporate Social Responsibility (CSR) principles.**

The company's CSR programs use responsible business practices and social investments to create long-term value. Our CSR focus areas include: transforming societies, creating an engaging employee experience, governing our business, developing and manufacturing products responsibly across the supply chain, and protecting the environment. Cisco leaders encourage all employees to be active in their communities and conserve limited resources. You can read more in the annual [CSR Report](#) or visit our [CSR website](#).

#### **Cisco values Human Rights.**

Cisco supports the Universal Declaration of Human Rights (UDHR) and the [United Nations Global Compact \(UNGC\)](#), a strategic policy initiative for businesses that are committed to aligning their operations and strategies with 10 universally accepted principles in the areas of human rights, labor, environment and anti-corruption. We regularly evaluate and address human rights issues within our business operations and in the communities in which we operate. Learn more by completing the updated [Human Rights Training](#).



## **We advocate the proper use of Cisco products and services.**

Cisco strongly supports free expression and open communication on the Internet. We believe the freedoms that come from connecting, including access to information, are crucial to protecting and advancing human rights.

Our goal in developing Information and Communication Technology (ICT) systems is to expand access to information and promote innovation. To meet this objective, we build our products on open, global standards, which we believe are critical to overcoming censorship, protecting privacy, and keeping the world connected.

We will continue to advocate for strong freedom of expression and privacy protections, which we believe are fundamental to successful business innovation and a thriving society.

## **The Manager's Role**

Cisco managers have leadership responsibilities for setting a good example, encouraging an environment of open and honest communication without fear of retaliation and taking prompt action when ethical issues are brought to their attention. They are expected to promote Cisco's ethical culture and never direct employees to achieve results that are in violation of the Cisco policies, the COBC or the law.

They also have approval responsibility for a variety of transactions on behalf of the company. As a Cisco manager or manager's proxy, you have important fiduciary responsibilities to ensure that policy requirements are met.



### Tools/Resources

- [Corporate Social Responsibility Website](#)
- [Cisco Corporate Affairs](#)
- [Corporate Quality Policy](#)
- [Cisco Business Management System](#)

## Related Policies & Websites

Policies covered in the Code of Business Conduct are listed below and can be accessed on Cisco's internal [Policy and Process Central](#) website.

### Respecting Others

- [Drugs and Alcohol in the Workplace](#)
- [HR-Policies](#)
- [Equal Employment Opportunity and Affirmative Action Policies](#)
- [Harassment in the Workplace](#)

### Using Resources Responsibly

- [Social Media Policy](#)
- [Social Media Best Practices and Q&As](#)
- [Corporate Video Policy](#)
- [Use of Cisco Assets](#)

### Conflicts of Interest

- [Cisco Conflicts of Interest, External Boards and Investments Policy](#)
- [Cisco Endorsement Guide](#)

### Gifts and Entertainment

- Receiving: [Gifts Disclosure Tool](#)
- Giving: [Gifts, Travel and Entertainment Tool](#)
- [Gifts, Travel and Entertainment Policy](#)
- [Travel Expense Policy](#)
- [Global Expense Policy](#)

- [Public Sector Gifts and Hospitality Guidelines](#)
- [Charitable Donations Policy](#)

### Protecting Data

- [Security & Trust Policies](#)
- [Data Protection Policy](#)
- [Data Protection Standard](#)

### Additional Data Protection Information, by Function

- [Cisco Records Management Policy and Retention Schedule](#)
- [Electronic Information Disposition Policy](#)
- [E-Mail Retention and Management Policy](#)
- [Global Analyst Relations Policy](#)

### Following Laws and Regulations

- [Global Anti-Corruption and Bribery Policy](#)
- [Global Anti-Corruption Policy for Cisco Partners](#)
- [Insider Trading Policy](#)
- [Privacy and Data Protection Policy](#)
- [Third-Party Copyrighted Materials](#)

### Financial Ethics and Integrity

- [Global Bookings Policy](#)

### Integrity

- [Cisco Quality Policy](#)
- [Global Human Rights Policy](#)

### Supplemental Ethics Codes

- [Cisco Financial Officer Code of Ethics](#)
- [Cisco U.S. Public Sector Ethics Code](#)
- [Cisco's E-Rate Program Guidelines for work with U.S. K-12 Schools and U.S. Libraries](#)
- [Supplier Ethics Policy](#) and [Supplier Code of Conduct](#)

# Glossary

**Bribe** – Giving or offering to give anything of value to a government official or company representative to influence a discretionary decision. Local laws may impose broader definitions.

**Cash Equivalents** – These could be: loans, stock, stock options, bank checks, travelers' checks, Visa or other type of check or cash cards, money orders, investments securities, or negotiable instruments.

**Company Assets** – These can be tangible and intangible items including: Cisco's facilities, equipment, and supplies; money; products, computer systems and software; patents, trademarks and copyrights; other proprietary information; and employees' work time.

**Copyrighted Materials** – Third-party copyrighted material can cover written works, diagrams, drawings, images, video, music, software, and audio recordings, whether it be the entire work or just portions of it. Additionally, third-party copyright protection can extend to such materials whether or not they bear copyright notices.

**Family Member/Relative** – A spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law, domestic partner (opposite sex or same sex), or other family member who lives with you or who is otherwise financially dependent on you, or on whom you are financially dependent.

**Friend** – For purposes of Cisco policies and the COBC, a friend is an individual with whom you have a significant personal relationship (in other words, a close friend).

**Gifts, Travel and Entertainment** – Anything of value, including but not limited to:

- Meals or lodging
- Discounts
- Loans
- Cash or cash equivalent
- Services
- Equipment
- Prizes
- Products
- Transportation
- Use of vehicles or vacation facilities
- Home improvements
- Tickets to entertainment/sporting events
- Gift cards or certificates
- Stocks
- Opportunity to buy direct shares in a company with a connection to Cisco
- Favorable terms on a product or service

**Government:**

- Any national, provincial, regional or local legislative, administrative, or judicial body
- Any state funded organizations, such as non-commercial organizations established by the special laws, schools, universities, healthcare facilities, police agencies, military entities, issuers of government permits, approvals or licenses etc.
- Any state-owned enterprises (SOE) and/or state instrumentalities
- Public (quasi-governmental) international organization (such as the United Nations, International Monetary Fund, African Union, etc.)
- Any public universities, hospitals, schools, libraries, sovereign wealth funds, and telecom service providers, as well as public international organizations, such as the United Nations, World Bank, or African Union.

**Harassment/Bullying** – Harassment is any unwelcome conduct that creates an intimidating, hostile, or offensive work environment, or that has the purpose or effect of unreasonably interfering with an individual’s work performance. Examples include, but are not limited to:

- Verbal or written comments and/or visual conduct (such as cartoons or gestures) of a derogatory or vulgar nature
- Physical conduct, including blocking normal movement, restraining, touching, or other aggressive or intimidating physical conduct
- Threatening or demanding that an individual submit to or to perform certain actions not reasonably related to job performance to keep or get a job, to avoid some other loss, or as a condition of job benefits, security, or promotion
- Retaliation for reporting harassment, for assisting another employee to report harassment or for participating in an investigation of a harassment complaint
- Unlawful sexual harassment, such as unwelcome advances, requests for sexual favors, and other verbal, written, visual, or physical conduct of a sexual nature – that impacts any aspect of employment

**Material Nonpublic Information** – Nonpublic information that would be reasonably likely to affect an investor’s decision to buy, sell or hold the securities of a company.

**Personal Data** – Any information that can be used to identify, contact or locate an individual.

**Single Source** – A non-Cisco, single entity. As employees, we each can accept one or more gifts from a single source (which is a single company or organization) with a maximum combined total market value of \$100 per year.

**Supplier** – Any vendor of product or services to Cisco, including consultants, contractors and agents, as well as any supplier that Cisco is actively considering using, even if no business ultimately is awarded.



## Additional Resources

Cisco provides many resources to help you in ethical situations.

### **Ethics Office**

- [Cisco Ethics Office](#)
- [Report Concerns/EthicsLine](#)
- [Ethics Resources for Managers](#)
- [Cisco Policy and Process Central](#)

### **Cisco Human Resources**

- [HR Data Privacy and Protection Team](#)

### **Global Public Sector Compliance Office**

- [publicsectorcompliance@cisco.com](mailto:publicsectorcompliance@cisco.com)

### **General Counsel**

- [generalcounsel@cisco.com](mailto:generalcounsel@cisco.com)

### **Cisco Investor Relations**

- [External](#)
- [Internal](#)

### [Global Analyst Relations](#)

### [Corporate Public Relations](#)

### **Cisco Audit Committee of the Board of Directors**

- Email – [auditcommittee@external.cisco.com](mailto:auditcommittee@external.cisco.com)
- Mail – Cisco Systems, Audit Committee  
105 Serra Way, PMB #112  
Milpitas, CA 95035

### **Cisco Information Security & Trust Organization**

- [Information Security](#)
- [Data Protection Program](#)
- [Global Data Privacy Office](#)

### **Privacy Team:**

- [Email](#)

### **Additional Certifications/Training**

- Work with Government Officials in the U.S. – Read and acknowledge Cisco's [U.S. Public Sector Ethics Code](#) and complete the training "[Working with U.S. Public Sector Customers](#)"

- Work with U.S. K-12 Schools or U.S. Libraries – Read and acknowledge Cisco's [E-Rate Program Guidelines](#)
- Work in the Finance Department – Review and accept the [Cisco Financial Officer Code of Ethics](#)
- Work in Global Sales/Marketing outside the U.S. or with global accounts – Complete the online [Global Anti-Corruption E-Learning course](#).

As part of the on-boarding process, new hires are required to complete the COBC certification (and any other relevant supplemental codes and mandatory training) when they join Cisco. Thereafter, new hires are required to participate in the annual COBC certification.

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Charitable donations	<a href="#">31</a>	Exports	<a href="#">25</a> , <a href="#">26</a>	Records use, retention	<a href="#">22</a> , <a href="#">27</a>
Competitive intelligence	<a href="#">28</a>	Financial reporting	<a href="#">27-28</a>	Referrals	<a href="#">17</a>
Confidentiality (reporting ethics issues)	<a href="#">8-9</a>	Foreign Corrupt Practices Act (FCPA)	<a href="#">24</a>	Reporting a concern	<a href="#">8-9</a>
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Copyrighted materials	<a href="#">13</a> , <a href="#">24</a>	Government	<a href="#">32</a>	Retaliation	<a href="#">8-10</a> , <a href="#">30</a>
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Discrimination	<a href="#">10</a>	Information, protection of	<a href="#">12</a> , <a href="#">21-26</a>	Threats, or violent behavior	<a href="#">10-11</a>
Drugs and Alcohol	<a href="#">10-11</a>	Insider trading	<a href="#">23</a> , <a href="#">26</a>	Trading stocks	<a href="#">23-24</a> , <a href="#">26</a>
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We welcome input on any aspect of the Code of Business Conduct.  
Please send email comments to: [COBC@cisco.com](mailto:COBC@cisco.com)

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