The bridge to possible

FY22 Code of Business Conduct

Welcome message from Chuck Robbins, Chair and CEO

Team,

As we continue to navigate this global health crisis and adapt to a hybrid world, I remain optimistic about our future together. To drive success for our customers, partners, and for Cisco, we must continue to deliver new innovations and capabilities at a pace that we have never experienced and be willing to change where needed.

Regardless of how we adapt, Cisco's steadfast commitment to maintaining the highest standards of business and professional conduct remains constant. Our customers, partners, and stakeholders around the world trust us, and the products and services that we deliver, because we consistently uphold strong values and always strive to make the right choices in how we conduct business.

The Code of Business Conduct (COBC) reflects Cisco's values and is a toolkit that you should reference when making business decisions and resolving issues that you may encounter.

Cisco's Conscious Culture is foundational to all we do. It demonstrates the importance of being aware of our environment and underscores that we are all accountable, empowered and expected to create a culture where everyone not only feels safe, but can thrive.

Our culture, principles, and commitment to full-spectrum diversity and inclusion should continue to guide all our business dealings and interactions, including how we treat one another. Cisco does not tolerate harassment or discrimination of any kind. It is important that you feel confident and safe in sharing any concerns and that Cisco will address the concerns in an appropriate manner. This is discussed further in the COBC under the heading: "I Respect Others."

If you ever have questions about the right thing to do, or feel that the COBC is being violated, please be sure to speak up – talk with your manager, contact ethics@cisco.com or reach out to the Legal team. You may also share concerns anonymously through the Ethics WebForm, or the multi-lingual 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, communities, and each other. Thank you for being a part of Cisco, and for continuing to uphold our principles and values.

Chuck Robbins
Chair and CEO

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I Know our Code and Act Ethically

Innovative ideas, emerging technologies, strategic acquisitions and a hybrid work environment. We work in a fast-paced industry where change is constant. But some things will never change, like our commitment to doing business honestly, ethically, and with respect for one another. Making the right ethical business decision and doing the right thing must be part of our DNA. Sometimes, situations arise where the right decision isn't completely clear.

That's where the COBC can help.

Our COBC is a user-friendly resource 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 internal and external relationships
  Full, fair, accurate, timely, and understandable disclosure in public reports and documents
- Protection of all confidential, personal, and proprietary information
- Compliance with applicable government laws rules, regulations, and directives
- Prompt internal reporting of any violations of the COBC, whether internal or external to Cisco
- Compliance with the COBC by every Cisco employee worldwide
- Creating a conscious culture

The COBC is extensive... but not exhaustive. 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 and updates the COBC annually to reflect such changes. In some cases, a country's local laws may establish requirements different from our COBC. A country's local laws always override the COBC, however, when a local business practice conflicts with our COBC, we follow our COBC. When in doubt, ask for help by contacting ethics@cisco.com.

Annual and new hire certification of the COBC and other supplemental code(s) and guidelines are required (subject to local law). Chairman and CEO Chuck Robbins and the Board of Directors require all employees, on an annual basis, to review, understand, certify, and comply with the COBC when notified. 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.

Waivers granted to executive officers or members of Cisco's Board of Directors must be approved by the Board and may also be subject to public disclosure, along with the reasons for granting the waiver.

Keep in mind, no one has the authority, including your manager, to make you engage in behavior that violates the COBC.

What if...

What if I work in a country where the local laws conflict with the guidance of the COBC? You should always follow the local laws. In some cases, a country's local laws may establish requirements different from our COBC. A country's local laws always override the COBC, however, when a local business practice conflicts with our COBC, we follow our COBC. **When in doubt, ask for help by contacting** ethics@cisco.com.

What if I have a concern with the COBC or have reservations about completing my certification? You should discuss any concerns with your manager, Human Resources (PEOPLE & COMMUNITIES), or ethics@cisco.com. Regardless of your COBC certification status, you are always obligated to follow the policies contained within the COBC. Completion of the COBC certification is a condition of employment at Cisco.

- Federal Sales Resources
- Global Anti-Corruption E-Learning
- Anti-Corruption and Bribery Policy
- Policy and Process Central

Ethical Decision-Making

Make good choices. We are each responsible for:

- Creating a Conscious Culture and complying with laws and regulations in the countries where we do business.
- Knowing and complying with our COBC and other company policies.

When 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. Our continued success depends on you making decisions that are consistent with our core values and principles.

There are rules and policies in our COBC. By certifying, we agree to follow those or face the potential consequences of disciplinary action, up to and including termination. Use the guide on the next page to help you choose the best course of action.

Ask yourself these questions for the best outcome

Is it legal?

Does this comply with Cisco policy?

Does this reflect Cisco's values and culture?

Is this action favorable for company stakeholders?

Would this represent Cisco in a positive light in a news headline?

If you answer **YES** to these questions, it's likely appropriate to move forward. If the response is **No** to any of these questions, stop and reconsider. Remember, it is always appropriate to **ask for help** to avoid any serious consequences.

For help, contact any of these resources:

Policy Central and Process Central | Your Manager | HR (People & Communities) | Legal | ethics@cisco.com

I Share My Concerns

As a Cisco employee, you have a responsibility to create a Conscious Culture and share your concerns when you see or suspect something that could harm another employee or the company. You also have an obligation to speak up promptly about anything you believe may constitute a violation. If you see or experience something that "just doesn't feel right", you are encouraged and supported to come forward.

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

Talk to your manager, an People & Communities representative, or Legal. Cisco does not tolerate retaliation against an employee for a question or report of misconduct made honestly and in good faith. Retaliating against an individual who asks a question or reports a COBC violation is in itself a COBC violation.

If you do not feel comfortable talking with your manager or People & Communities, or you don't feel the outcome resolved the issue, please contact ethics@cisco.com. 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, efficiently, and confidentially, to the extent possible by law.

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.

Ask or report. You can confidentially contact the Ethics Office:

Email: ethics@cisco.com
You can also contact the Audit Committee of the Board of Directors via email at:
auditcommittee@external.cisco.com

Online: Ethics WebForm, for Cisco employees, non-employees, and anonymous reporting. When reporting matters anonymously, please ensure that you retain your unique URL or case number so that we can use our platform to stay in contact if we have further questions while ensuring that you maintain your anonymity.

Phone: The multilingual 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 may 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 can also be submitted – confidentially or anonymously – using the following private mailbox (PMB):
Cisco Systems, Audit Committee
105 Serra Way, PMB #112, Milpitas, CA 95035

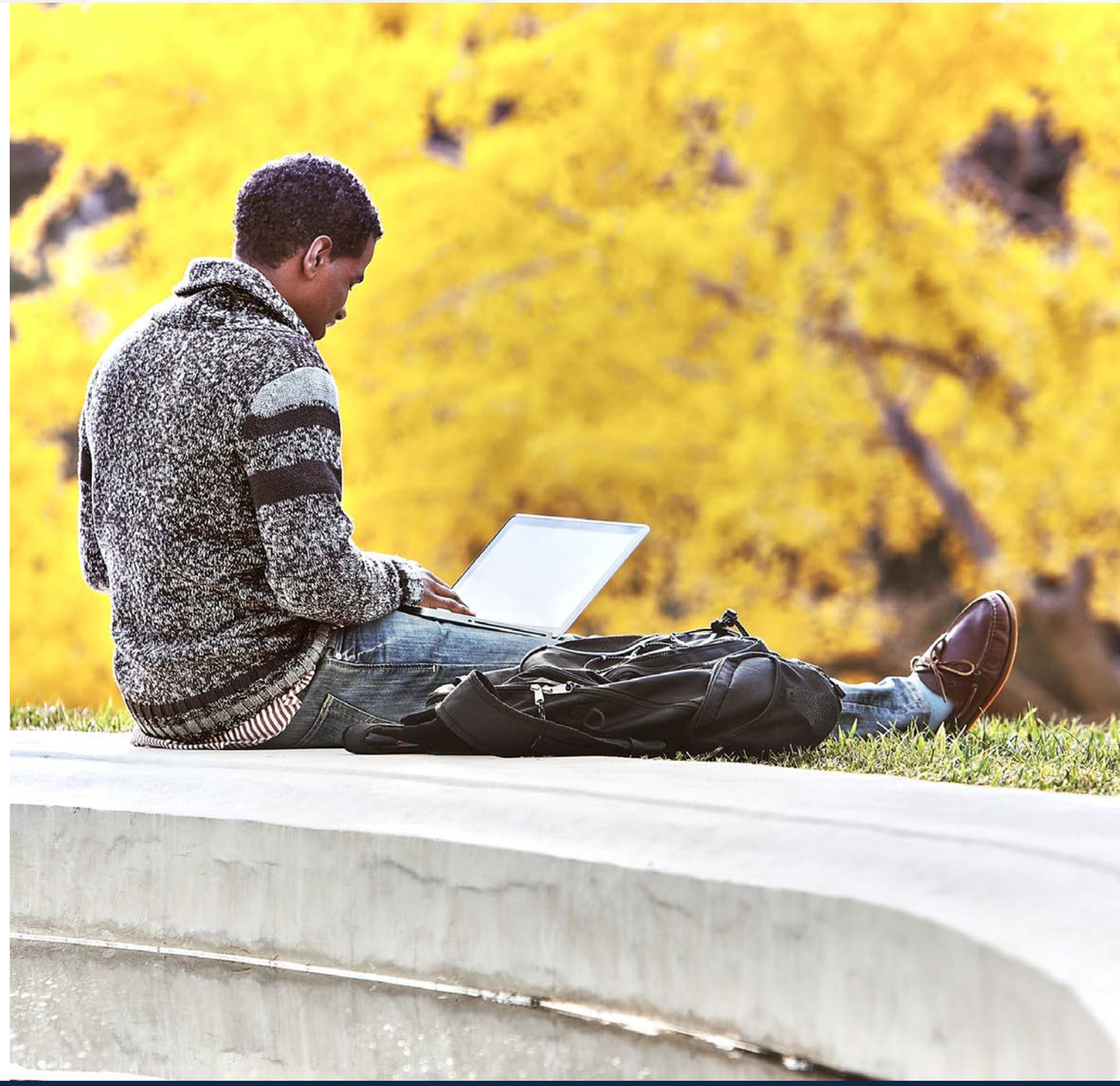
What if...

What if Cisco Corporate Investigations (CCI) asks me to participate in an internal investigation about a fraud situation within my organization? Do I have to cooperate? Yes. As a Cisco employee, you are obligated to cooperate in internal investigations.

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 WebForm, you can check on the status of your submission using the link you received when creating your original submission through the anonymous site. Our third-party provider may respond to your inquiry with follow-up questions using the Ethics WebForm tool. Calls to the multilingual EthicsLine are assigned a case number, so you can remain anonymous, and still follow-up on your concern.

How do I get in touch with my People & Communities representative or Employee Relations? Please access the Employee Services Help Zone website.



I Respect Others

A Conscious Culture means being aware of your environment and being accountable. Cisco strives to create an inclusive culture that is welcoming, positive, creative, and rewarding – an environment that promotes individual and team expression, innovation, and achievement.

How are Cisco employees empowered to succeed?

You should do your job without fear of discrimination, harassment, or bullying.

Cisco is passionate about preserving our positive culture and ensuring that each individual is treated with respect, fairness, and dignity as a valued member of the Cisco team. Cisco is proud of and values its global, diverse workforce.

Cisco prohibits conduct that singles out an employee or a group of employees in a negative way based on characteristics, existence, and attributes that have been the basis for historical marginalization, and all categories protected by law. In all of our employment-related processes, decisions are made without regard to:

- Age
- Ancestry
- Color
- Citizenship
- Gender
- Gender expression
- Gender identity
- Gender information
- Marital status
- Medical condition
- National origin
- Physical or mental disability
- Pregnancy
- Race
- Religion
- Caste
- Sexual orientation
- Veteran status

Harassment can take many forms, including unwelcome verbal or physical contact, or repeated misconduct that may be seen as objectively offensive by a reasonable person. Any type of harassment is a violation of Cisco's philosophy and policies.

Our workplace accommodates individuals with disabilities. Disabilities may be visible or invisible. Likewise, individuals' disabilities 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's Employee Relations provides subject matter expertise as they guide managers and employees through Cisco's accommodation process.

We are committed to providing a safe and non-threatening workplace. Employees should be familiar with and follow all security and safety guidelines and report any unsafe conditions, situations, or accidents. Any acts of violence toward another person or company property should be reported immediately. For more information, please go to the Corporate Security Center.

You can help protect Cisco assets by adhering to the Cisco Global Access Control Policy, which includes wearing your Cisco Badge and ensuring it is visible at all times. Always scan

your badge at the door access reader before entering a Cisco facility and do not allow un-badged persons into Cisco buildings. Please contact the Corporate Security Center.

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 personal information that is collected, held,and used. Everyone must appropriately respect individual privacy rights and handle PEOPLE & COMMUNITIES personal information in accordance with the Global People Data Protection Policy.

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 Global Meetings and Events Policy.

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

What if...

What if I feel like I am being discriminated against because of my gender? You should follow any of the listed ways to address your concerns about discrimination in the workplace:

1. Report it to ethics@cisco.com
2. Tell your manager
3. Open a case with People & Communities or Employee Relations

What if my manager or co-worker 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 your People and Communities representative, ethics@cisco.com, or Legal for help in determining the next steps.

What if I receive a phone call from someone requesting information about a co-worker? You should not disclose personal information about your co-workers to anyone. Employee work information such as phone numbers, email addresses, and reporting structures, are Cisco proprietary/confidential information and should never be provided to unknown persons.

- Global Meetings & Events Portal
- Global Safety, Security & Business Resiliency

I Use Resources Responsibly

Cisco counts on you to use good judgment to conserve and safeguard company resources. This section will help you understand the proper use of Cisco's resources.

What's allowed and what is prohibited?

Company assets: Office space, and things like computers, copiers, internet access, and office supplies, for example. Company assets are provided for business use and should be used for business purposes to advance company objectives.

Limited personal use: Of course, Cisco understands that employees may need to use Cisco resources from time to time. Such occasional use of company assets for personal reasons is permitted, within reason, as long as it does not compromise Cisco's interest or adversely affect job performance (yours or that of your co-workers).
Note: For diversity guidance regarding the 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.

Examples of Unauthorized use of Cisco resources:

- Borrowing or removing Cisco resources from company premises without proper authorization.
- Using Cisco resources to support a personal business, consulting efforts, or outside fundraising activity.
- Demo or lab equipment, or resources that have been identified as "scrap," garbage, or destined for recycling, cannot be used for non-company purposes without approval.

Using the company's resources is not private. Information and material transmitted or stored on company resources may be monitored, retained, or reviewed. ***Note:*** *When employees use their personal devices (smart phones, tablets, etc.) for work, those devices are subject to monitoring and review by Cisco, and employees need to protect any company-related information that is exchanged or stored on those devices at all times (refer to* I Am Trusted with Data).

Be respectful and professional when using the internet and social media tools. Cisco empowers employees to use social media to conduct company business, as well as to facilitate collaboration and innovation. As noted in our Social & Digital Media Policy, it's very important to avoid mishandling intellectual property or improperly disclosing any personal data or confidential/restricted information (*refer* to I Am Trusted with Data). The rules for proper conduct in the physical world also apply "online". If you are ever unsure, submit a question to 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 be used only for business purposes pursuant to Cisco's policies.

Proper use of internal communication channels: Cisco internal communications (e.g., discussion forums, intranet communities, mailers, etc.) support collaboration and peer relationships. The 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:

Political activities and contributions: You may participate in political activities on an individual basis, on your own time, with your own resources and money (refer to the I Follow the Law *section*). You may not use Cisco assets including time at work, use of Cisco premises or equipment to contribute to a political candidate, political action committee, or ballot measure without the written permission of the **SVP Chief Government Strategy Officer.**

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.

Keep it legal and keep it clean: Do not access, distribute, download, or upload material (including music) that is prohibited by law or protected by third-party copyright without permission from the owner. Sexual content, offensive language, derogatory comments about race, gender, sexual orientation, age, religion, or anything that would reflect negatively on Cisco is also prohibited.

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 SVP **Chief Government Strategy Officer**.

Use of Non-Cisco Messaging Apps

Non-Cisco messaging applications such as iMessage, Signal, SnapChat, WhatsApp, WeChat, Wickr, Slack, Telegram, etc., have become prevalent in recent years and provide a convenient way to conduct real-time communications. But these non-Cisco messaging apps should not be used to transact Cisco business or to conduct communications that would create Business Records, see the Enterprise Data Retention and Destruction Policy. This is especially true for ephemeral messaging applications where the message disappears upon or shortly after reading. Communications that may create Business Records must be conducted using Cisco-approved communications tools for Business Records and maintained in Cisco-approved repositories, such as SharePoint. If you inadvertently create, store, or transfer Business Records using non-Cisco messaging apps (for example, if a customer initiates a communication with you using such an app), you must ensure that such Business Records are promptly preserved and maintained in Cisco-approved repositories.

What if...

What if I store some personal items on my Cisco laptop like family photos and a family newsletter? Is Cisco allowed to view these items? Yes. Cisco may review information and material transmitted or stored on company resources.

· E-mail Distribution Policy for Mass Emails and Mailer

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, and availability of confidential, personal, and proprietary information, whether it belongs to Cisco, our employees, customers, vendors, partners, or others with whom we do business. We are also tasked with ensuring that data is processed and protected according to privacy and security requirements, rules, and regulations worldwide.

We are transparent, fair, and accountable.

We are transparent, fair, and accountable in how we secure our products and data to earn the verifiable trust of our customers, partners, shareholders, and employees. Securing and protecting Cisco and third-party data is everyone's business. We all play an important role in enabling Cisco's strategy of aligning business and technology priorities to provide pervasive security and privacy and maintain our reputation as a responsible data custodian.

How do we protect data?

It is critical that employees understand our expectations for protecting data, applications, and their underlying systems.

We need to take the appropriate training found on the Keep Cisco Safe, Cisco Security Space Center, and Privacy Learning and Development intranet sites to build our knowledge.

Cisco outlines the data lifecycle and our framework for classifying and protecting data based on its nature, level of sensitivity, value, and criticality. We must also understand any additional, applicable privacy policies and requirements, such as Business Personal Data Protection and Privacy Policy or the Global People Data Protection Policy relevant to the data you or your organization handles, and complete regular security and privacy education and awareness training.

Cisco has implemented and enforces security policies and controls on all electronic and computing devices used to conduct Cisco business or interact with 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) messages, files, data, software, or other information (whether business or personal) stored on these devices or transmitted over the Cisco network or at Cisco facilities to ensure compliance with Cisco policies. If you use your own personal devices for work (even over your own network), those devices are subject to monitoring and review and remain subject to Cisco privacy and security requirements. All devices that connect to Cisco's networks or are used to conduct Cisco business must adhere to the Trusted Device Standard. Devices that do not comply with this standard may receive only limited access to applications, services, or data.

Cisco also maintains physical and digital security monitoring systems and capabilities for the protection of our people, assets, resources, and business interests. These systems are generally focused on common areas, such as parking lots, entryways, and hallways; however, Cisco reserves the right (subject to applicable law) to monitor other public and semi-public areas, including offices or workstations, when necessary, for safety, security, and policy compliance.

Incident Reporting. An incident is any situation where protected data can be lost, stolen, compromised, or otherwise improperly handled, including attempts (failed or unsuccessful) to gain unauthorized access to a system or its data. Just as we take steps to protect our own information, we must also protect Cisco's information by reporting any known or suspected incident involving personal data and/or confidential/proprietary information. All employees must report all incidents upon discovery at Report an Incident page.

Security and Privacy Agreements. In addition to applicable legal requirements and internal Cisco security and privacy policies, we must also comply with a variety of agreements related to security and privacy, which may include non-disclosure agreements and contractual confidentiality requirements placed on Cisco by our customers and other third parties (for example, see Master Data Protection Agreement). Before sharing data with third parties, employees must have authorization and disclose only what is necessary ("need to know") to accomplish the legitimate business need.

Bringing Information into Cisco. Any unsolicited or unauthorized third-party, confidential/proprietary information must not be used by Cisco without permission from the owner. If such information is received by an employee, it must be immediately returned to the owner, deleted, destroyed, or transferred to Legal.

Employees must also refrain from using or sharing with Cisco any confidential, proprietary information belonging to former employers, unless the former employer, or the rights to the information, have been acquired by Cisco.

What if...

My email program auto filled the wrong address, and I disclosed sensitive customer information to another customer by accident. What should I do? Report the incident immediately to our Incident Command team. Do not take any further action until you are contacted by the Incident Command team.

Do Cisco privacy policies apply only to products and services or do they also apply to our internal systems and processes? Cisco privacy policies apply wherever Cisco processes personal information, whether it's collected from the products and services we sell or the internal business systems and processes we use. Necessary privacy and security controls must be implemented so that Cisco can honor its commitments to its customers, partners, employees, and other data subjects. To learn more about privacy at Cisco, please visit the Chief Privacy Office intranet page.

- Security & Trust Organization (S&TO)
- Trust Center
- Information Security
- Chief Privacy Office

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 interest.

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 liability and reputational harm. Cisco employees are expected to diligently avoid such conflicts.

Conflict of Interest
Perceived or Actual

Some common situations that can lead to a Conflict of Interest (COI) include:

Work outside Cisco (COI Disclosure Tool)

- Outside work that relates to your Cisco responsibilities or that negatively impacts your performance or work hours at Cisco
- Outside work involving a Cisco partner, customer, supplier, or potential candidate for acquisition
- Outside work involving a Cisco competitor is never allowed

Personal relationships (COI Disclosure Tool)

- Family member works at Cisco in the same reporting hierarchy or in a position where either of your roles has decision-making influence over the other
- Family member works for a Cisco competitor, partner, customer, supplier, or potential candidate for acquisition in a way that relates to or could interfere with your Cisco role
- Engaging in any non-Cisco business relationships with someone in your reporting hierarchy (e.g. borrow/lend money, rent property, or other personal business dealing)

External boards (COI Disclosure Tool)

- Roles on For-profit boards of directors, technical advisory, or government boards
- Other industry and non-profit boards where Cisco is or may be a customer or business partner (disclosure not required as long as not a Cisco customer or business partner related to your Cisco role and no use of Cisco resources)

External investments (COI Disclosure Tool)

- Investment in a private company that is a Cisco competitor, partner, customer, supplier, or potential candidate for acquisition
- Investment in a public company if more than 1% of the company's total shares
- Investments by Family members that could be attributed to you

Other potential conflicts

- Development of outside inventions or other intellectual property
- Speaking engagements, publications, endorsements
- Anything else that gives the appearance of a conflict or that may cast you, Cisco, or the other party in a negative light should be raised with the Ethics Office.

For help in assessing if your particular situation requires disclosure please use our Conflict of Interest Decision Trees and SharePoint Page for FAQs.

Further descriptions and required actions for the COI situations above are detailed in the Cisco Conflicts of Interest, External Boards, and Investments Policy. Special rules apply to certain Cisco named executives and the Cisco Board of Directors as outlined in the policy.

You should also keep in mind that any outside work that could result in the development of inventions or other intellectual property that is, or may become, related to Cisco's current or potential business would be subject to your Proprietary Information and Inventions Assignment (PIIA) Agreement, which generally provides that all rights relating to any such inventions belong to Cisco.

What if...

What if I perform some outside work as a paid consultant for a small tech company? Is this permitted? You may have a job outside of Cisco, as long as it does not interfere with your work hours or job performance with Cisco. You may obtain the required approvals and it is not a competitor or potential competitor of Cisco. In addition, any outside work that could result in the development of inventions or other intellectual property related to Cisco's current or potential business would be subject to the Proprietary Information and Inventions Assignment (PIIA) Agreement.

What if I am a project manager at Cisco tasked with engaging a vendor to deliver a specific business outcome. After working with numerous vendors for many years I realize that I can create my own supplier business and provide those same services to Cisco at an even better price by using more outsourced labor. Am I allowed to procure services on behalf of Cisco from a company that I own? No. Being on both sides of a transaction creates a Conflict of Interest where the employee can no longer exclusively represent Cisco's interest.

What if a family member also works at Cisco? If you and your family members work on different teams and you have no influence or decision-making authority over each other (on employment or any other work-related matters), then disclosure is not necessary. But if one of you is responsible for managing the other (directly or indirectly), or you have potential influence over the other family member's role or compensation, you should disclose using the COI Disclosure Tool. Familial relationships in the same reporting

chain are generally prohibited. If you wish to refer a family member for a job at Cisco, mention your relationship and recuse yourself from any hiring decision. Disclosure is also required if your family member works at an outside company that could overlap with or relate to your role at Cisco (for example, IT procurement role at a Cisco customer if you support that customer account).

What about investments or ownership in an outside company that does business with Cisco or our customers/partners/vendors?

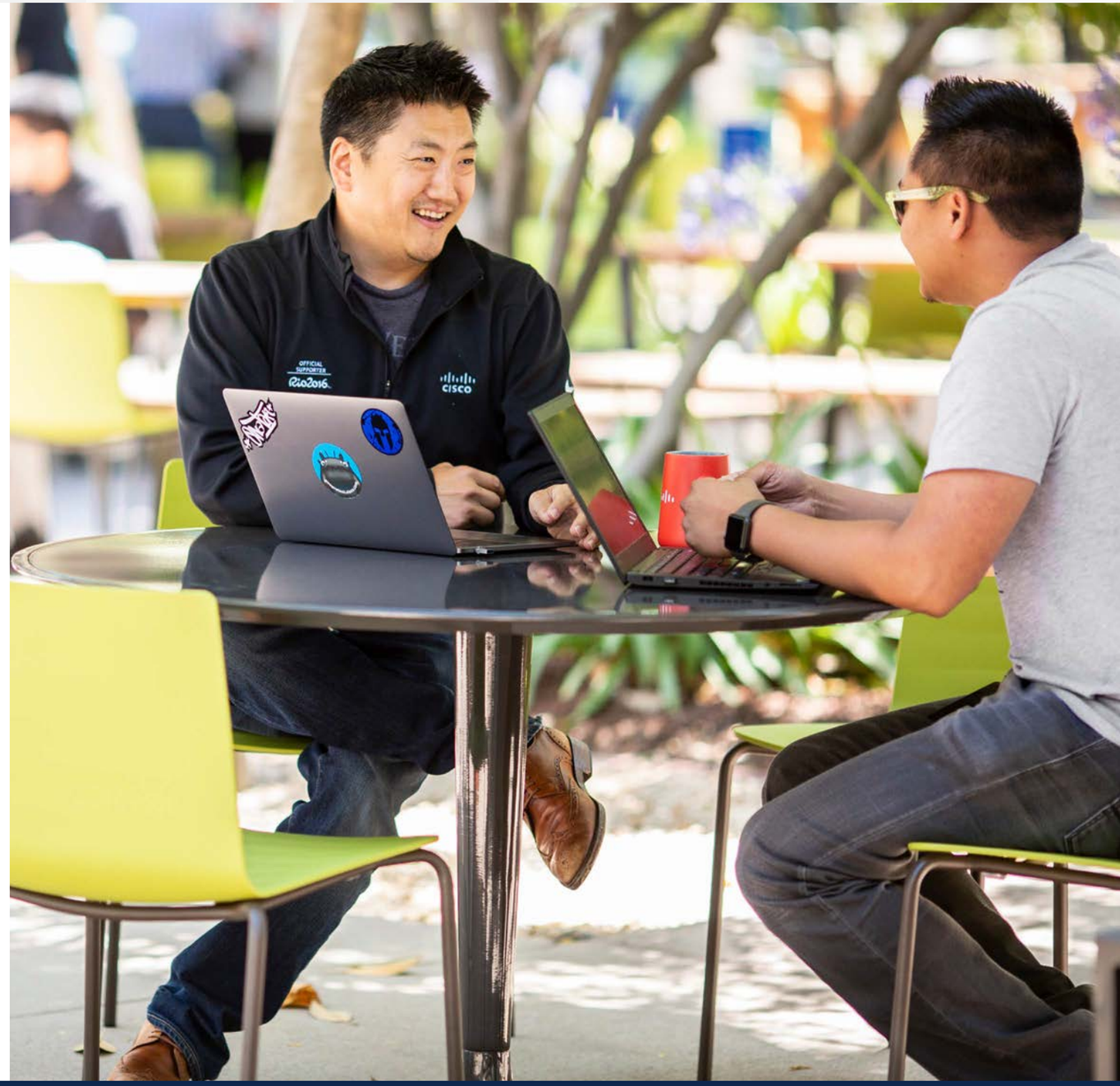
If you have (or a family member has) a role, ownership, or investment in a company that relates to your responsibilities for Cisco, does business with Cisco or with Cisco customers or partners with whom you might interact for Cisco, may result in you receiving personal benefits, or could otherwise create a perception of impropriety, then you must disclose using the COI Disclosure Tool and recuse yourself from all involvement with that company.

TOOLS

· Conflict of Interest Disclosure Tool

TIP

If you are unsure whether your situation could be a conflict, contact ethics@cisco.com.



I Make Ethical Decisions when Giving and Receiving Gifts, Travel, and Entertainment

Cisco encourages our employees to build relationships with customers, partners, service providers, vendors, and suppliers and recognizes that at times this may involve providing meals, gifts, and entertainment. Sometimes, though, even the most well-intentioned offering can cross the line.

It is important when giving or receiving anything of value as part of an appropriate business relationship, that you comply with Cisco's policies and all applicable laws, act transparently, and avoid even the perception of unethical behavior. Familiarize yourself with the Gifts, Travel, and Entertainment (GTE) Policy and GTE Decision Tree to better understand Cisco's standards around whether a potential offering is **appropriate**, whether it is of r**easonable value**, and whether it requires **disclosure and pre-approvals**.

GTE Guidelines

Do

- Consider whether it is reasonable and appropiate.
- Consider the perception of giving or receiving the gift.
- Know your Customer's Organization – is it Public Sector which has much more restrictive limits.
- Comply with laws, regulations and policies, and disclose when required prior to purchasing anything (see Gifts Travel and Entertainment Policy for requirements)

Don't

- Give cash, gift cards or other cash equivalents
- Give or accept anything of excessive value.
- Give anything of value to a government official without prior approval.
- Use a third-party to give gifts on our behalf.
- Give corporate sponsorships or giveaways/promotions without prior approval.

Pre-Approval Requirements

- For gifts and entertainment given to Private Sector employees there is no pre-approval is required in GTE Tool. However, you will need manager approval if it exceeds $250USD and VP approval if above $500USD.
- For Public sector (or state-owned) recipients, the thresholds depend on their employer's country:
  - **US**: Limits are very stringent.
    With limited exceptions for high-level appointees and executives, the federal government follows the $0 rule
    US State, Local and Education employees the limit is $0/$20 per gift per recipient or $50 per recipient per year based on local laws.
  - **Russia**: Limit is $0, this means all expenses incurred on Russia Public sector employees require GTE Disclosure in GTE Tool.
  - **Non-US/Russia**: Limit is $250 per recipient per gift and $1000 per recipient per annum on cumulative spend per recipient. Any expense above this required GTE Disclosure.
- Finally, all airfare and accommodation gifted to either Public or Private Sector must be registered in the GTE tool.

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, regional or local laws, or the policies of the third-party. For example, a private company may have stricter requirements or if the customer is a public sector US official some states have a $0 threshold for all GTE related expenses (for more details see here) e.g. if the customer is a public sector US official, or a private company with stricter requirements). Regardless of value, the offering still needs to be appropriate (e.g., not given to unduly influence a business award or favor, be sure to check both with Cisco's GTE policy and then with the potential recipient entity).

Where required by the policy, use the GTE Disclosure Tool before ***giving*** a gift, or the Receipt of Gifts Disclosure Tool before ***receiving*** a gift. When in doubt, simply contact corporate_compliance@cisco.com before giving or receiving anything of value.

What if I instruct a partner to give a gift to the customer instead of providing it directly? The GTE Policy applies whether an offering is provided directly or indirectly (including through a third-party or an agent on behalf of a third-party) and whether using Cisco, third-party or personal funds. Cisco can also be held responsible if we are aware, or should have known, that a third-party is engaging in an improper activity.

What if I can't tell whether a customer is a private or public sector customer? The GTE Policy applies to recipients from both private or public sector and state-owned entities. The appropriate, reasonable value and pre-approval standards still apply. Check out the GTE Disclosure Tool "Search Pub-Sec" page to identify whether a customer is from a state-owned/public sector entity to avoid a violation.

For any other questions or concerns, contact corporate_compliance@cisco.com for assistance. For gifts internally between Cisco employees, refer to the Global Expense Policy and the Cisco Employee Recognition Policy.

- Receiving: Receipt of Gifts Disclosure Tool
- Giving: GTE Disclosure Tool
- U.S. Public Sector Hospitality Guidelines
- Gifts, Travel and Entertainment Policy
- Global Anti-Corruption and Bribery Policy
- Global Anti-Corruption Policy for Cisco Partners

I Prevent Corruption or Bribery

Cisco has zero tolerance for bribery and corruption. Corruption violates the public's trust, threatens economic and social development, and hurts fair trade. To combat corruption, most countries have enacted anti-corruption/anti-bribery laws and regulations.

These laws make it a crime to give, pay or promise "anything of value" (bribes) to:
- influence an act or a decision to obtain, retain, and/or direct business, or
- secure an improper advantage of any kind

It is paramount to act with the utmost integrity, honesty, and transparency, and comply with the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other regional and national anti-corruption laws.

The FCPA makes it a crime to offer, pay, or promise to pay anything of value to any foreign official in order to influence a decision or secure an improper advantage - typically to win or retain business.

The UK Bribery Act is even broader, and prohibits the offering or giving of anything to any recipient in order to influence a decision or secure an improper advantage.

These values are so important to us, that we will forgo business opportunities rather than pay bribes, and we will support our employees when faced with losing sales based on refusal to pay bribes.

Check the Global Anti-Corruption and Bribery Policy or contact ethics@cisco.com for assistance.

Gifts, Travel, and Entertainment. Regarding acceptable versus prohibited business gifts refer to the "I Make Ethical Decisions when Giving and Receiving Gifts, Travel, and Entertainment" section. Offers to pay for guest travel or hospitality must be made in accordance with the Global Anti-Corruption and Bribery Policy.

Our partner's behavior. Cisco works with business partners who share our values for transparency and honesty in all business dealings. We require that our business partners comply with our Anti-Corruption and Bribery policies and applicable laws. 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.

Third parties (also called "intermediaries") cannot be used to facilitate or hide bribery. Suppliers, agents, consultants, distributors, and business partners cannot offer or receive a bribe when working on Cisco's behalf. Inducing, facilitating, or causing a third party to perform an act that violates the COBC and Cisco's Anti-Corruption & Bribery policy, is prohibited.

What if...

As an account manager, I am involved in a very competitive RFP with a very significant customer and given my customer four tickets to an expensive sporting event in hopes to win the business. Is that permissible? Cisco's policies prohibit you from giving anything of value in exchange for competitive advantage, or in other words a "quid pro quo."

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 tolerate 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 ethics@cisco.com or Legal.

TOOLS

Anti-Corruption:

- Global Anti-Corruption Training
- Receiving: Receipt of Gifts Disclosure Tool
- Giving: GTE Disclosure Tool
- Gifts, Travel, and Entertainment Policy
- Cisco U.S. Public Sector
- U.S. Federal Sales (Ethics Code and Compliance Guide)
- U.S. Public Sector Hospitality Guidelines

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.

Responsibly and accurately manage Cisco finances. All Cisco employees are personally responsible for any company-related funds that they control or spend. 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 or expenses managed through third parties on behalf of Cisco. 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 the Global Expense Policy and other related policies, such as Global Travel and Corporate Card, Global Meetings & Events, Gifts, Travel and Entertainment (GTE), Procurement, etc. Employees must submit all business expenses in approved tools where available: SAP Concur or Emerging Markets Expense Tool depending on the region). Cisco employees are required to accurately categorize, provide a valid receipt and submit all expenses in a timely manner (within 30 days of incurring the expense). Mischaracterization of a business transaction or creation of false or inaccurate documentation, such as claiming non-business or unapproved related expenditures, is strictly prohibited. A reminder that as of FY21, Gift Card purchases for employees, contractors or third-party individuals are non-reimbursable and prohibited.

Protect Cisco when purchasing goods and services. Following our procurement process ensures you will maintain compliance. The Procurement Compliance Made Easy Guide will take you step-by-step through the process to help you understand your responsibilities as you find, order, receive, and pay for any indirect goods and services on behalf of Cisco while complying with our policies. It's your responsibility to do it right.

Adhere to Cisco's Procurement Policies. Cisco employees are required to comply with the Indirect Procurement Policy when purchasing goods or services on behalf of Cisco. A purchase order must be approved before Cisco engages in any work with a vendor or supplier in order to ensure the spend has been pre-approved by management.

In some situations, as outlined in our Indirect Procurement Policy, purchases are allowed through channels outside of a purchase order. In those cases, please utilize the Authorization of Expenditure Policy for approval guidance.

Expenses must be paid for or accrued in the period in which they are incurred. Invoices must be recorded and accounted for in the quarter in which services were received. Likewise, accruals must be made in the period when the goods or services are received. Attempts to reallocate unused budget crossing quarters could present a parked fund situation where Cisco's funds are not accurately recorded and 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 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.

A soft booking is an order from a partner that does not have a firm end user purchase order (PO). It is the seller's responsibility to inform the partner that all orders must have a firm end user PO prior to the partner placing an order with Cisco. If the seller is aware that an order does not have a firm end user PO, they are required to report this to their sales finance team so the order can be evaluated and accurately recorded in our quarterly bookings numbers in accordance with the Global Bookings Policy. Anything short of a firm end user PO, such as, an end user letter of intent, memorandum of interest or any non-binding document, are not sufficient for a partner to book an order with Cisco. Pressuring a partner to book an order without an end user PO or allowing an order to be booked knowing it does not have an end user PO and without notifying the Sales Finance team, is a serious offense and violation of the Code of Business Conduct, which may result in disciplinary action, up to and including termination.

What if...

What if when working on a tight timeline, I ask my supplier to begin work even though the purchase order hasn't been approved? A purchase order must be approved and in place before a vendor begins work.

What if my manager is exerting pressure to "make the numbers work" and book a deal where we know the end user has only provided a letter of intent to the partner? This would be an example of a "soft order." Your responsibility is to be honest and accurate. If you feel pressured to do otherwise, contact ethics@cisco.com, Legal or People & Communities. 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 EthicsLine anytime, night or day, worldwide.

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. Off- Book funds are a violation of policy even if the funds are used to pay for

business expenses. For example, you must not prepay a vendor in order to use the unexpended budget for work that is to be done in future quarters.

Discounting Practices. Cisco adheres to strict policies on discounting and reviews each deal to ensure discounts are appropriate for each unique customer engagement. It's considered a serious violation to structure a deal where the customer can choose only high discounted products. Such a situation is called "cherry picking" and is not allowed because it can result in discount abuse and potential product diversion. Refer to your Finance Controller or ethics@cisco.com if you believe you are being asked to structure a deal in this way.

Product Diversion. The diversion of Cisco products into the gray market results in significant financial loss to Cisco each year. It is your responsibility to ensure discounts requested are for appropriate competitive reasons and necessary to win the business. Inflated discounts could result in product diversion to the "gray market" causing damage to Cisco's legitimate resellers and possible service abuse. If you believe that products/services are being sold outside the approved deal, or with an unregistered or suspicious reseller, contact Brand Protection and ethics@cisco.com. Any conflicts of interest with a Cisco reseller should also be reported to ethics@cisco.com.

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 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 Legal, ethics@cisco.com, or the Audit Committee of the Board of Directors. As with the COBC, it is against the Cisco policy to retaliate against an employee for good-faith reporting of any potential or actual Code violations.

What if...

What if a partner asks for two additional discount points on a deal that they intend to set aside for Cisco and the partner to use for future customer travel and marketing activities? Is that permissible? You should never submit discount requests that are not necessary to win the business and creates prohibited off-book funds, even if the funds are used for business purposes the creation of these funds is considered a serious violation.

What if I suspect a deal is getting booked without a purchase order or end-user commitment? In a direct sale, all deals must be accompanied by a purchase order from the customer.

If a sale is through a partner or reseller, it is the responsibility of the field teams to inform the partner or reseller that all sales are final, and orders must have valid end user purchase orders.

These sales records ensure that our finances are accurate and protect the company from taking orders that do not meet the criteria for Cisco to accept orders or soft orders. Inform your Sales Finance Controller immediately if you are aware of orders booked without an end user purchase order so that appropriate action can be taken. Refer to the Global Bookings Policy for the required elements of a purchase order.

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, Marketing Funds, Donations, or Software)? Cisco employees should not direct or allow 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.

TOOLS

Additional Resources:

- Accrued Liabilities Policy
- Indirect Procurement Policy
- Authorization of Expenditure Policy

I Follow the Law

Being a good global corporate citizen includes following the laws and regulations 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 and competition laws encourage competition in the marketplace so that consumers have more choices and can benefit from lower prices. Antitrust and competition laws around the world prohibit business practices that reduce competition. Antitrust rules forbid agreements between competitors on the prices or other terms on which they will sell products or services or that divide customers or markets. Antitrust laws also set rules regarding exclusive dealing, bundling and tying, below-cost pricing, preventing or discouraging resellers from discounting, fixing minimum resale prices, 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 the companies and the individuals involved, including fines and imprisonment. Violation of other Antitrust rules can lead to high fines and monetary 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, a supplier, or a competitor is not in compliance with those laws, contact your local Legal counsel or the Antitrust team at antitrust@cisco.com.

Insider Trading and Corporate Confidentiality

Do not trade on "inside" information. If you have material, non-public information relating to Cisco or our business, you, nor any other person or entity acting on your behalf, may buy or sell Cisco securities. This also applies to trading in the securities of another company (i.e., Cisco customers, suppliers, vendors, subcontractors, acquisition targets, and other business partners, and at times, competitors) if you have material, non-public information about that company obtained by virtue of your position at Cisco. The appearance of an improper transaction must be avoided. Trading patterns are closely monitored by government regulators, and Cisco fully cooperates with government investigations of potential illicit trading.

Even a "tip" is unlawful. Cisco employees are prohibited from tipping off others or passing along inside information to friends or family that suggests 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 discussing sensitive information in public settings.

Derivatives and hedging transactions are not permitted. Cisco employees are 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 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 U.S. 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, verify 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 in other public communications.

Individuals' Political Contributions

Under United States election laws, some Board Members (CEO, Executive VP, Corporate Secretary) and employees involved with sales to certain States, as well as employees sitting on State or Local Government Boards may be required to obtain pre-approval via the U.S. Political Contribution Tool before making certain kinds of campaign contributions. 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 the Third-Party Software Use and Distribution 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 have a license from the copyright holder covering your use. Certain copyrighted materials, such as works in the "public domain," may be used without authorization. A work generally falls into the public domain if it was published prior to 1923. If you are planning to use third party materials without permission, you should contact copyright@cisco.com for further review and guidance, prior to use.

This requirement applies in all cases, even where the end product is for personal or Cisco internal use, and includes material like pictures, text, and videos, as well as software and source code (for example, an open source library downloaded from the web). 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 the Copyrights team.

Export Regulations

All employees are responsible for abiding by U.S. and International export laws. The export of Cisco products, with appropriate licenses where required, 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 Legal Global Export Trade (GET) team 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 the 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 in connection with their Cisco work.

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...

Because of my role at Cisco, I become aware of Cisco's intent to acquire a public company. Can I purchase shares of that public company before the acquisition is publicly announced? No, because Cisco's intent to acquire the public company is material, non-public information that I learned by virtue of my position at Cisco.

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.

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 ethics@cisco.com for assistance.

TOOLS

- Cisco Legal Global Export Trade Team
- Chief Privacy Office
- Privacy Team
- S&TO Education Center – Data Protection and Privacy Education

Our Commitment to Integrity

Customer experience and quality count.

I am responsible for understanding how my role ultimately impacts the customer. I will seek to achieve our customers' business goals and desired outcomes, make their interactions with Cisco easier; and deliver world-class products, services & solutions, and the best customer experience in the technology industry.
I agree to follow the Quality Policy and the Business Management System which describes our commitment to quality and our customers. Please go to Policy and Process Central sites for more information.

Corporate Social Responsibility.

I act in a manner consistent with our approach to Corporate Social Responsibility (CSR). Our commitment to CSR starts at the top with our Board and senior leadership and is embedded throughout the organization. Cisco's actions are grounded in our Conscious Culture, where trustworthiness and ethical conduct are expected and supported among our employees, suppliers, and business partners. From our culture of trust and responsibility, to our strategic social investments, to the way we manage and support our global supply chain, to how we reduce our impact on the environment, our CSR and business strategies are tightly integrated.

I respect Human Rights. Our Global Human Rights Policy, which we have maintained since 2012, is informed by international human rights frameworks, including the UN Universal Declaration of Human Rights (UDPEOPLE & COMMUNITIES), the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, the eight International Labor Organization (ILO) core labor conventions, and the UN Global Compact. The policy reflects our commitment to apply the United Nations Guiding Principles on Business and Human Rights, which clarify the corporate responsibility to respect human rights. We regularly evaluate and address human rights issues within our business operations and in the communities in which we operate.

We advocate the proper use of Cisco products and services. Cisco strongly supports privacy, freedom of expression, and open communication on the internet. We believe the freedom that comes from connecting, including access to information, is crucial to protecting and advancing human rights.

Our goal in developing Information and Communication Technology systems is to expand access to information and promote innovation. To meet this objective, we build our products to open, global standards, which we believe are critical to overcoming censorship, data protection and privacy, and keeping the world securely connected.
We 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's managers have leadership responsibilities for setting a good example, encouraging a Conscious Culture and 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 Cisco policies, the COBC, or the law.

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

TOOLS

- Corporate Social Responsibility
- Corporate Affairs
- Corporate Quality Policy
- Brand Protection

Additional Resources

Cisco provides many resources to help you in ethical situations.

Ethics Office
- Ethics Office
- Report Concerns/EthicsLine
- Ethics Program
- Policy and Process Central

Cisco HR (People & Communities)
- hrprivacy@cisco.com
- Conscious Culture

Global Public Sector Compliance Office
- publicsectorcompliance@cisco.com

General Counsel
- generalcounsel@cisco.com

Cisco Investor Relations
- External
- Global Analyst Relations
- Corporate Public Relations

Cisco Audit Committee of the Board of Directors
Email: auditcommittee@external.cisco.com
Mail: *Cisco Systems, Audit Committee*
105 Serra Way, PMB #112
Milpitas, CA 95035

Security & Trust Organization
- Security & Trust
- Data Protection Program

Privacy Team
- Chief Privacy Office
- Ask privacy@cisco.com

Additional certifications/training available
- Work with Government Officials in the U.S.
  – Review the U.S. Public Sector Ethics Code

- Work with U.S. K-12 Schools or U.S. Libraries
  – Read the E-Rate Program Guidelines

- Work in the Finance Department
  – Review the Financial Officer Code of Ethics

- Work in Global Sales/Marketing outside the U.S. or with global accounts – complete the online Global Anti-Corruption and Bribery E-learning course.

Ask/Report

You can confidentially contact the Ethics Office by:

Email: Ethics Office: ethics@cisco.com

Online: Ethics WebForm, for Cisco employees, non-employees, and anonymous reporting

Phone: The multi-lingual EthicsLine is available 24 hours a day, seven days a week, worldwide, with country-based, tollfree 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 can also be submitted – confidentially or anonymously – using the following private mailbox (PMB):

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

You can also contact the Audit Committee of the Board of Directors via email at: auditcommittee@external.cisco.com

We welcome input on any aspect of the Code of Business Conduct. Please send email comments to: cobc@cisco.com

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