

Global Supplier Code of Conduct

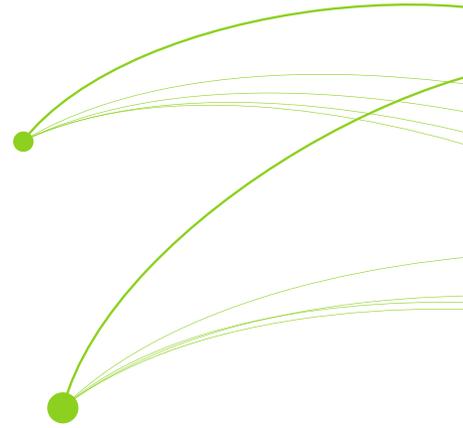




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This Infoblox Global Supplier Code of Conduct (“Supplier Code”) applies to all Infoblox suppliers and contains principles to promote ethical conduct in the workplace, safe working conditions, the protection of sensitive information, the treatment of workers with respect and dignity, and responsible manufacturing processes. As used in this Supplier Code, “supplier” or “suppliers” refers to any entity providing materials, products, software, people and/or services to Infoblox, including its subcontractors and agents, and, where applicable, the personnel of Infoblox and its subcontractors and agents. “Infoblox” refers to Infoblox Inc. and its affiliates

Infoblox expects its suppliers to comply with this Supplier Code or a code of conduct that is substantially similar. For this Supplier Code to be successful, suppliers must regard the Supplier Code as a total supply chain initiative. Suppliers are responsible for ensuring that all their workers (employees, temps, agents, contractors, etc.) and any subcontracted party performing work on behalf of Infoblox, including at a minimum all next tier suppliers along with any third party they engage, are informed of and agree to comply with this Supplier Code or a code of conduct that is substantially similar.

Any violation of this Supplier Code may result in remedial action(s) up to and including termination of contracts or status as a supplier to Infoblox. However, this Supplier Code is not intended to create new or additional rights, or any additional Infoblox obligations, in favor of suppliers, supplier personnel, or any third parties. It supplements, but does not supersede, the contracts between Infoblox and suppliers.

Fundamental to adopting this Supplier Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates and conduct its business activities in an honest and ethical manner. This Supplier Code encourages suppliers to go beyond legal compliance, drawing upon internationally recognized standards, to advance social and environmental responsibility and business ethics. In no case can complying with this Supplier Code violate local laws. If, however, there are different standards between this Supplier Code and local law, Infoblox defines conformance as meeting the strictest standard.

This Supplier Code serves as a guide for ethical conduct, however, it may not cover every situation. We encourage all suppliers to ask questions and to immediately report events of questionable, fraudulent or illegal nature that are, or may be in violation of this Supplier Code, or other applicable laws or regulations. Questions or reports of misconduct can be raised by calls or submissions to the [Infoblox Ethics Hotline](#).

These submissions are received by an independent third-party service specifically retained by Infoblox to handle such reports. In countries where applicable, reports can be made anonymously, and will be kept confidential to the fullest extent necessary to conduct a reasonable investigation in accordance with local law.

A. BUSINESS ETHICS AND STANDARDS OF CONDUCT

To meet social responsibilities and to achieve success in the marketplace, suppliers and their agents should uphold the highest standards of ethics.

1. Business Integrity

The highest standards of integrity should be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, kickbacks, extortion and embezzlement.

2. Anti-Bribery / Anti-Corruption

All business dealings should be transparently performed and accurately reflected on supplier business books and records. Appropriate controls should be in place to ensure compliance with anti-corruption laws, including but not limited to, the United Kingdom Bribery Act of 2010, the United States Foreign Corrupt Practices Act of 1977, U.S. Travelers Act and OECD Anti-Bribery Convention.

Bribes or other means of obtaining undue or improper advantage should not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3. Gifts and Entertainment

Infoblox discourages the exchange of gifts or entertainment expenses by suppliers either during commercial negotiations or any other time to gain business advantage. Any gifts exchanged shall be modest, properly recorded, and in accordance with reasonable customary practices.

4. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Supplier's business books and records. Information regarding supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance should be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

5. Conflict of Interest

A conflict of interest may arise when a supplier attempts to gain improper advantage for any relationship it may have outside that with Infoblox. Suppliers shall disclose to Infoblox if there is an actual or potential conflict of interest.



6. Intellectual Property

Intellectual property rights should be respected, transfer of technology and know-how should be done in a manner that protects intellectual property rights, and customer and supplier information should be safeguarded.

7. Fair Business, Advertising and Competition

Standards of fair business, advertising and competition should be upheld.

8. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers should be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

9. Responsible Sourcing of Minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Infoblox upon request.

10. Privacy

Suppliers should commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers should comply with applicable privacy laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

11. Information Security

Suppliers must comply with [Infoblox Minimum Security Standards](#) to protect Infoblox customer or employee data. Infoblox may annually request audit documentation (such as SOC 2 Type 2 report) from suppliers to review for third party risks.





12. Trade Compliance

Suppliers must comply strictly with all applicable export and import laws and regulations and not export, re-export, transfer, divert, release, import or disclose any Infoblox products or any direct product thereof, technical data relating to such products, or Infoblox confidential information to another person or entity except under license or as otherwise permitted under such laws and regulations. All suppliers must comply with economic sanctions and trade embargoes imposed or approved by the United States Government. Suppliers are responsible for understanding such restrictions and must report any non-compliance as it relates to Infoblox products (or ask export-related questions related to Infoblox products) by contacting tradecompliance@infoblox.com.

13. Diversity

Infoblox champions the use of [diverse suppliers](#) and encourages diversity initiatives in its own supply chain; suppliers adopting these initiatives are preferred and likely to obtain a higher volume of Infoblox business. Suppliers tracking their own diverse suppliers (e.g. Minority Business Enterprise (MBE); Women Business Enterprise (WBE); Lesbian, Gay, Bisexual, Transgender (LGBT); and Veteran Owned Business (VET)) should contact supplierdiversity@infoblox.com with the annual spend in these areas.

B. LABOR

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

1. Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

2. Young Workers

Suppliers shall not exploit child labor and shall not employ any workers under the age of 15 or the minimum legal working age, whichever is greater. Employment of workers under the age of 18 should not interfere with their compulsory education and should not, by the nature of the work or the circumstances in which it is carried out, be likely to harm their health, safety, or morals. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as entry level workers performing equal or similar tasks.



3. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Suppliers shall set work schedules and overtime policies consistent with local and national law. Suppliers will abide by maximum hour and workweek laws.

4. Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of local law.

5. Humane Treatment

There should be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6. Non-Discrimination

Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Infoblox is an equal opportunity employer and its suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

7. Freedom of Association

In conformance with local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

C. HEALTH and SAFETY

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

1. Occupational Safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical, and other energy sources, fire, vehicles and fall hazards) should be identified, assessed and controlled through proper design, engineering and administrative controls, preventative maintenance, safe work procedures (including lockout/tagout) and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers should be provided with appropriate, well-maintained personal protective equipment and educational materials about risks associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working conditions with high hazards, including those associated with their work assignments.

2. Emergency Preparedness

Potential emergency situations and events should be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3. Occupational Injury and Illness

Procedures and systems should be in place to prevent, manage, track, and report occupational injury and illness including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes and facilitate return of workers to work.

4. Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks, should be identified, evaluated, and controlled.



5. Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers should be provided and properly maintained where machinery presents an injury hazard to workers.

6. Sanitation, Food and Housing

Workers should be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities. Worker dormitories provided by suppliers or a labor agent should be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured accommodations for storing personal and valuable items and reasonable personal space along with reasonable entry and exit privileges.

7. Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards those workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training should be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.





D. ENVIRONMENT

Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

1. Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals and registrations should be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

2. Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste should be minimized or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance, and facility processes or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, should be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3. Hazardous Substances

Chemicals and other materials posing a hazard to humans or the environment should be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4. Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations should be characterized, routinely monitored, controlled, and treated as required prior to discharge. Suppliers shall conduct routine monitoring of the performance of air emission control systems.

6. Materials Restrictions

Suppliers should adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7. Water Management

Suppliers shall implement a water management program that documents, characterizes and monitors water sources, use and discharge, seeks opportunities to conserve water and controls channels of contamination. All wastewater should be characterized, monitored, controlled and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.



8. Energy Consumption and Greenhouse Gas Emissions

Suppliers shall track and document energy consumption and greenhouse gas emissions at the facility and/or corporate level and report such information to environmental@infoblox.com. Suppliers shall look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

E. PROGRAM MANAGEMENT

Suppliers shall adopt or establish a management system whose scope is related to the content of this Supplier Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with this Supplier Code; and (c) identification and mitigation of operational risks related to this Supplier Code. It should also facilitate continual improvement.

1. Company Commitment

Corporate social and environmental responsibility policy statements affirming supplier's commitment to compliance and continual improvement, endorsed by executive management.

2. Management Accountability and Responsibility

Supplier clearly identifies senior executives and company representatives responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

3. Legal and Customer Requirements

Supplier maintains a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Supplier Code. Supplier shall comply with this Supplier Code and other applicable laws or regulations. Suppliers based in the United States must comply with the U.S. Department of Defense 'Defense Federal Acquisition Regulation Supplement' (DFARS) and NIST SP 800-171 Cybersecurity standard to protect Controlled Unclassified Information (CUI).

4. Risk Assessment and Risk Management

Maintain a process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance

5. Improvement Objectives

Written performance objectives, targets and implementation plans to improve supplier's social and environmental performance, including a periodic assessment of supplier's performance in achieving those objectives.

6. Training

Programs for training managers and workers to implement supplier's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

7. Communication

A process for communicating clear and accurate information about supplier's policies, practices, expectations and performance to workers, third party suppliers, and customers.

8. Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Supplier Code and to foster continuous improvement.

9. Tax Compliance

Suppliers shall ensure compliance with applicable tax laws and regulations in the country where it operates.

10. Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements related to social and environmental responsibility.

11. Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

12. Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

13. Supplier Responsibility

A process to communicate Supplier Code requirements to your downstream suppliers and to monitor their compliance with the Supplier Code.



Infoblox is the leader in modern, cloud-first networking and security services. Through extensive integrations, its solutions empower organizations to realize the full advantages of cloud networking today, while maximizing their existing infrastructure investments. Infoblox has over 12,000 customers, including 70 percent of the Fortune 500.

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