

Infoblox Inc. UK Modern Slavery Act Statement

I. INTRODUCTION

Infoblox's mission is to simplify networking and security. Infoblox is committed to the highest standards of legal and ethical business conduct and has long operated its business consistent with written operating principles and policies that reinforce this commitment. To that end Infoblox is committed to ensuring that our supply chain is free from any kind of forced or indentured labor or human trafficking. We believe that upholding the human rights of workers, and treating them with dignity and respect is a fundamental responsibility of all good corporate citizens with whom we do business.

II. INFOBLOX'S BUSINESS

Infoblox Inc. ("Infoblox") is a privately held company, and is headquartered in Santa Clara, California. This statement covers all of Infoblox's global entities including Infoblox UK Ltd. and will be reviewed on an annual basis. Infoblox provides industry leading software, security, and hardware solutions. Doing so requires the sourcing of electronic components on the global market. Infoblox recognizes the legal and compliance risks and other possible adverse impacts that may be associated with sourcing materials and electronic components derived from extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas. Infoblox additionally recognizes the need to inspect our supply chain for conditions that may put people at risk of involuntary labor.

III. MEASURES TO PREVENT MODERN SLAVERY

Infoblox conducts the following actions to help prevent force labor, modern slavery, and human trafficking

Conflict Minerals Policy

Infoblox has adopted and, subject to Infoblox's relative leverage with respect to each supplier, will use commercially reasonable efforts to incorporate in agreements with direct suppliers appropriate provisions of its conflict minerals policy. While sourcing from, or operating in, conflict-affected and high-risk areas, Infoblox will use commercially reasonable efforts to avoid contributing to, assisting with or facilitating the commission by any party of human trafficking or slavery.

Per the conflict minerals policy Infoblox will:

- 1) Upon becoming aware of human trafficking or slavery, investigate and take such action as proper under the circumstances; and
- 2) Seek certifications from its suppliers that the materials provided to Infoblox comply with laws regarding slavery and human trafficking.

Additionally consequences for suppliers engaged in prohibited conduct can include terminating or not renewing an existing contract with the supplier; non-renewal of an existing contract with the supplier or more stringent verification or audit obligations.

Employee Code of Conduct

Infoblox's code of business conduct and ethics summarizes the ethical standards for all directors, officers and employees and is a reminder of the seriousness of our commitment. Compliance with Infoblox's code of business conduct and ethics is mandatory for every Infoblox director, officer, and employee. Employees must participate in annual training, and assessments on the code of conduct.

Whistleblower and Complaint Policy

Infoblox is committed to investigating complaints and reports regarding breaches of laws, governmental rules, regulations, and company policies. Violations can be reported confidentially and anonymously.

Due Diligence

Infoblox conducts a security risk assessment of its vendors prior to contracting. Depending on the risk presented by the vendor, a re-assessment is conducted thereafter on a risk based approach with vendors who have higher risk assessments undergoing more frequent re-assessments. Any concerns raised by any employees of Infoblox and its subsidiaries are escalated to Infoblox Inc. and are handled by its legal department.

All vendors who sign our terms and conditions to provide services to Infoblox acknowledge that all times during the term of the agreement that they will comply with Infoblox's [Global Supplier Code of Conduct](#). The Global Supplier Code of Conduct is published and available publicly.

Global Human Trafficking Awareness Training

Infoblox offers a training course on its internal training platform for all employees on the topic of Global Human Trafficking. The course goal is the educating of an audience on recognizing human trafficking, and then being able to deal with it accordingly.

1.0 Overview

Recognizing the legal and compliance risks and other possible adverse impacts that may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (“Conflict Minerals”), Infoblox Inc. (“Infoblox”) has adopted and, subject to Infoblox’s relative leverage with respect to each supplier, will use commercially reasonable efforts to incorporate in agreements with direct suppliers appropriate provisions of the following policy on Conflict Minerals.

2.0 Process Section

2.1 Scope

2.2 Process Narrative

Regarding serious abuses associated with the extraction, transport or trade of minerals:

- I. While sourcing from, or operating in, conflict-affected and high-risk areas, Infoblox will use commercially reasonable efforts to avoid contributing to, assisting with or facilitating the commission by any party of any of the following, and it shall seek the same commitment from its direct suppliers by integration of appropriate provisions of this Conflict Minerals Policy into its supplier agreements:
 - Not have a formal program for proactive verification that its suppliers are not engaging in human trafficking or slavery, but has commenced efforts to increase the awareness and sensitivity to these issues within Infoblox. In the event Infoblox is made aware that a supplier may be engaging in prohibited conduct, Infoblox will undertake such investigation and take such action as it deems reasonable and proper under the circumstances.
 - Not have a formal program to proactively conduct audits of its suppliers with respect to human trafficking or slavery. Infoblox requires that its suppliers comply with all applicable laws, including those relating to labor, working conditions and human trafficking. In the event Infoblox is made aware that a supplier may be engaging in illegal conduct, it will undertake such investigation and take such action as it deems reasonable and proper under the circumstances.
 - Above, Infoblox generally requires that its suppliers comply with all applicable laws. In addition, Infoblox is currently working with its suppliers to obtain certification that materials provided to Infoblox comply with the laws regarding slavery and human trafficking of the country or countries in which the supplier is conducting business.
 - Even an employee or supplier engages in or fails to address circumstances that indicate a supplier is engaging in prohibited conduct, the consequences for non-compliance will depend on the nature, circumstances and context of the violation. Consequences for suppliers engaged in prohibited conduct can include terminating or not renewing an existing contract with the supplier; non-renewal of an existing contract with the supplier or more stringent verification or audit obligations.
 - Is providing education regarding human trafficking and slavery laws to its employees who have direct responsibility for supply chain management to assist in selecting and monitoring suppliers.

Regarding risk management of serious abuses:

- II. If Infoblox determines that there is reason to believe that a supplier is contributing to, assisting with or facilitating the commission by any party of the acts identified in Section 1, Infoblox will take appropriate measures to enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Infoblox from the applicable supplier.

Regarding serious abuses associated with the extraction, transport or trade of minerals:

- III. Infoblox will use commercially reasonable efforts to avoid directly or indirectly supporting non-state armed groups through the extraction, transport, trade, handling or export of minerals, and it shall seek the same commitment from its direct suppliers by integration of appropriate provisions of this Conflict Minerals Policy into its supplier agreements. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
 - Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;
 - Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
 - Illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups:

- IV. If Infoblox determines that there is reason to believe that a supplier is sourcing from any party providing direct or indirect support to non-state armed groups as defined in Section 3, Infoblox will take appropriate steps to enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Infoblox from the applicable supplier.

Regarding public or private security forces:

- V. While sourcing from, or operating in, conflict-affected and high-risk areas, Infoblox will avoid directly or indirectly supporting public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders, and it shall seek the same commitment from its direct suppliers by integration of appropriate provisions of this Conflict Minerals Policy into its supplier agreements.
- I. While sourcing from, or operating in, conflict-affected and high-risk areas, Infoblox shall only engage public or private security forces in accordance with the Voluntary Principles on Security and Human Rights, and, subject to each supplier's position in the supply chain and Infoblox's relative

leverage with respect to each supplier, it shall use commercially reasonable efforts to obtain the same commitment from its direct suppliers by integration of this Conflict Minerals Policy into its supplier agreements.

- I. While sourcing from, or operating in, conflict-affected and high-risk areas, Infoblox will, where reasonable and subject to Infoblox's position in the supply chain, support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved, and, subject to each supplier's position in the supply chain and Infoblox's relative leverage with respect to each supplier, it shall use commercially reasonable efforts to obtain the same commitment from its direct suppliers by integration of this Conflict Minerals Policy into its supplier agreements.
- I. While sourcing from, or operating in, conflict-affected and high-risk areas, Infoblox will, where reasonable and subject to Infoblox's position in the supply chain, support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites, and, subject to each supplier's position in the supply chain and Infoblox's relative leverage with respect to such supplier, it shall use commercially reasonable efforts to obtain the same commitment from its direct suppliers by integration of this Conflict Minerals Policy into its supplier agreements.

Regarding risk management of public or private security forces:

- IX. If Infoblox determines that there is reason to believe that a direct supplier is indirectly or directly supporting public or private security forces in violation of Sections 5-8 above, Infoblox will take appropriate measures to enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Infoblox from the applicable supplier.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

- X. Infoblox will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals or to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export, and it shall seek the same commitment from its direct suppliers by integration of appropriate provisions of this Conflict Minerals Policy into its supplier agreements.

Regarding money laundering:

- XI. Infoblox will, where reasonable and subject to Infoblox's position in the supply chain, support efforts, or take steps, to contribute to the effective elimination of money laundering where it determines that there is reason to believe there is money laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers, and it shall seek the same commitment from its

direct suppliers by integration of appropriate provisions of this Conflict Minerals Policy into its supplier agreement.

Regarding the payment of taxes, fees and royalties due to governments:

- XII. Infoblox will take reasonable efforts to ensure that any foreign taxes, fees, and royalties paid by Infoblox related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments.

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money laundering and payment of taxes, fees and royalties to governments:

- XIII. If Infoblox determines that there is a reason to believe that a direct supplier is engaging in bribery, fraudulent misrepresentation of the origin of Conflict Minerals or money laundering in violation of Sections 10 and 11 above, or is in violation of Section 12 above, Infoblox will take appropriate measures to enforce this Conflict Minerals Policy and any contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Infoblox from the applicable supplier.

2.3 Frequently Asked Questions

Q:

A:

2.4 Definitions

None

2.5 Related Policies, Procedures and Documentation

None

2.6 Change Requirements

Changes to this Process require following Process 3.01.A Infoblox Policy Change Process.

3.0 Administrative Section

3.1 Staff Involved - Roles and Responsibilities

Name	Position	Role and Responsibility
		Policy Contact
		VP Representative
		Approver of the Policy
		Change Manager
		Change Requestor
		Change Stakeholder

3.2 Reason for the Policy

See Section 1.0 “Overview”.

3.3 Consequence for not Following Policy

3.4 Resolution/Redress

Disputes as the nature of the process, or exceptions can be followed up with _____.