



Supplier Ethics Policy



Cisco Supplier Ethics Policy

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

We are Ethical

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

We Acknowledge and Abide by this Policy

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

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

We Follow the Law

As a Cisco Supplier, we will comply with all laws, regulations and policies applicable to us and our dealings with Cisco, including all applicable government contractual requirements, which flow down to us through our contracts with Cisco. This includes, but is not limited to:

- applicable U.S. Small Business rules and regulations;
- Affirmative Action and Equal Employment Opportunity rules and regulations;
- rules regarding suspension and debarment of companies from doing business with the U.S. Government and other similar laws and regulations applicable in other jurisdictions.



We Understand Cisco's Policies Concerning Insider Trading

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

We Understand Cisco's Gifts and Entertainment Policies

Prohibited As a Cisco Supplier, we will not offer, promise or provide to any Cisco employee a kickback, favor, cash, gratuity, entertainment or anything of value to obtain favorable treatment from Cisco. Cisco employees are similarly prohibited from soliciting such favors from us. This restriction extends to any family members of both our and Cisco employees, or with any other persons with whom we have or Cisco employees have significant personal relationships in exchange for obtaining or retaining Cisco's business. Note: Cisco employees are prohibited from accepting initial public offering (IPO) stock from us, as a Supplier.

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

- The total value of a tangible gift or gifts is of nominal value (\$100 or less per year) or \$200 or less, per year, for intangible gifts/entertainment (such as event tickets, etc.);
- public disclosure would not embarrass Cisco;
- the gift is reasonable and appropriate consistent with Cisco's business practices, and;
- acceptance of the gift does not violate any applicable laws.
- The Cisco Ethics Office and senior management of the intended recipient must approve acceptance of any gift that does not fit within these criteria.



We Avoid Conflicts of Interest

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

We Avoid Unfair Business Practices

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

We are a Socially and Environmentally Responsible Supply Chain Partner

As a supply chain Supplier or Partner, we acknowledge and commit to comply with the **Electronic Industry Citizenship Coalition (EICC) Code of Conduct** as adopted by Cisco. The EICC Code ensures worker safety and fairness, environmental responsibility and business efficiency.

We Provide Quality

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



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

As a Cisco Supplier, we understand our obligation to maintain the highest standards of integrity in all business interactions worldwide. Any and all forms of corruption, such as bribery, extortion or embezzlement, are strictly prohibited.

Cisco defines bribery or a bribe as, "Directly or indirectly giving or offering anything of value to a government official or an employee of a commercial enterprise for the purpose of obtaining or retaining business, to win a business advantage, or to influence a decision regarding Cisco. This also includes: obtaining licenses or regulatory approvals, preventing negative government actions, reducing taxes, avoiding duties or custom fees, or blocking a competitor from bidding on business."

We will act consistently with Cisco's Global Anti-Corruption Policy, available for review on the Cisco website at http://www.cisco.com/legal/anti_corruption.html or by contacting legalcompliance@cisco.com.

We will not make Political Contributions or Charitable Donations for Cisco

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

We Avoid Unauthorized Lobbying on Cisco's Behalf

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



We Speak Up About Ethical Concerns

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

By Telephone (Cisco Ethics Line)

A North America Toll Free **877-571-1700**

Outside of North America/Reverse Charge **770-776-5611**

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

By Email

- ethics@cisco.com - Use this email address to report any concerns or potential violations, or for general inquiries to the Ethics Office. Inquiries can include questions about the Supplier Ethics Policy or the Cisco Code of Business Conduct.
- auditcommittee@cisco.com - Use this email address to communicate concerns to Cisco’s Audit Committee of the Board of Directors.

Anonymously

If you prefer to remain anonymous, you can mail a letter to the Audit Committee’s private mailbox (PMB) at:

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



We welcome input on any aspect of the
Supplier Ethics Policy.

Please send email comments to: ethics@cisco.com

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