



# Cisco Supplier Ethics Policy

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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. Compliance with legal and ethical standards is the responsibility of everyone in the supply chain ecosystem at every level. All Cisco Suppliers and Cisco employees are expected to conduct themselves with the highest standards of honesty, fairness, and personal integrity, with adherence to all applicable laws and avoidance of the perception or appearance of impropriety or conflict of interest.

This Policy applies globally to all Cisco Suppliers. “Supplier” means any business, company, corporation, person, or other entity that sells, or seeks to sell, whether directly or indirectly, any kind of goods or services to Cisco, and it includes the Supplier’s employees, agents, and other representatives. Questions concerning this Policy can be directed to the Cisco Ethics Office at [ethics@cisco.com](mailto:ethics@cisco.com).

### Following the law

Suppliers shall comply with all laws, regulations, and policies applicable to them and their dealings with Cisco, including all applicable government contractual requirements, which apply through contracts with Cisco. These laws, rules, regulations, and policies include:

- Equal employment
- Anti-discrimination and harassment
- Human rights
- Anti-corruption and bribery
- Conflicts of interest
- Health and safety
- Environment
- Codes of business conduct

### Understanding Cisco’s policies concerning insider trading

By virtue of their interaction with Cisco, Suppliers may be exposed to material, nonpublic information about Cisco or another company (including Cisco’s customers, other suppliers, vendors, or other business partners). Suppliers may not buy or sell Cisco’s or that company’s securities or engage in any other action to take advantage of that information, including sharing that information with others.

### Understanding Cisco’s policies concerning gifts, travel, and entertainment

Suppliers are expected to abide by the policies put in place by the Cisco organizations or business units with which they work. In addition, Suppliers may not provide any gifts, travel or entertainment of any value to any third party, directly or indirectly, on behalf of Cisco or a Cisco employee, and may not make any type of political contribution or charitable donations on behalf of Cisco or a Cisco employee.

Even if a gift, travel or entertainment offering is permitted, it must still only be offered if it is: (a) **appropriate** (no cash or cash equivalents or other excluded gift type, does not create an actual or perceived perception of impropriety, and complies with all laws, regulations and policies for all parties), (b) of **reasonable value**, and (c) with full **transparency** of its value.

## **Avoiding conflicts of interest**

A financial or any other relationship between a Supplier and a Cisco employee (or a family member or friend of a Cisco employee) that could involve a financial benefit or other personal or competing interest may create an actual, potential or perceived conflict of interest for Cisco and/or a Supplier. A conflict of interest arises when the personal interests of the Cisco employee and the Supplier (or its employees or agents) are inconsistent with his/her/its responsibilities to Cisco or the Supplier company. All such conflicts must be disclosed and approved or corrected. Even the appearance of a conflict of interest may be damaging to Cisco and to the Supplier, and it 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](mailto:ethics@cisco.com).

## **Avoiding unfair business practices**

Cisco is fully committed to competing fairly and complying with antitrust and competition laws in every country where it does business. Cisco Suppliers shall not fix prices or rig bids with Supplier's competitors. Likewise, Suppliers shall not allocate customers or markets with Supplier's competitors, or exchange current, recent, or future pricing information with Supplier's competitors. Suppliers shall otherwise comply with all applicable antitrust and competition laws. Suppliers are expected to understand and comply with all applicable fair business, advertising and competition laws including antitrust laws.

## **Acting in accordance with Cisco's anti-corruption policy**

Corruption violates the public's trust, threatens economic and social development, and hurts fair trade. All forms of corruption, such as bribery, extortion, and embezzlement, are strictly prohibited. Cisco defines bribery as "directly or indirectly giving or receiving (or even offering) anything of value for the purpose of obtaining or retaining business, to win a business advantage, or to influence a decision regarding Cisco. This includes bribes related to: obtaining licenses or regulatory approvals, preventing negative government actions, reducing taxes, avoiding duties or custom fees, or blocking a competitor from bidding on business."

Cisco is committed to doing business with integrity and in compliance with the highest anti-corruption standards. Suppliers will conduct themselves with honesty, fairness, and high ethical standards, as well as abide by all anti-corruption and bribery laws and avoid even the perception of impropriety or a conflict of interest in all business interactions worldwide, including as set out in Cisco's Global Anti-Corruption Policy, available for review on the Cisco website at [https://www.cisco.com/legal/anti\\_corruption.html](https://www.cisco.com/legal/anti_corruption.html).

## **Avoiding Unauthorized Lobbying on Cisco's Behalf**

Suppliers may not 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. Suppliers should contact the Ethics Office regarding such matters at [ethics@cisco.com](mailto:ethics@cisco.com).

## Respecting Intellectual Property Rights, Privacy, and Data Protection

Suppliers are expected to respect and comply with intellectual property rights. Any transfer of technology, proprietary information, or trade secrets without Cisco's prior written consent is prohibited. Suppliers are required to respect the reasonable privacy and confidentiality expectations of everyone with whom they do business, and appropriately protect all data that may come into their possession because of their relationship with Cisco. This includes data relating to Cisco, Cisco employees, customers, and partners, and entails compliance with Cisco's instructions and privacy, data protection, and security laws and regulations when personal, confidential, proprietary, or other sensitive information is collected, stored, processed, transmitted, or shared.

## Speaking up about ethical concerns

Suppliers shall promptly notify the Cisco Ethics Office regarding any known or suspected improper behavior relating to dealings with Cisco, or any known or suspected improper behavior by Cisco employees or agents. Suppliers can report any concerns by contacting [ethics@cisco.com](mailto:ethics@cisco.com) or through email, phone, web portal, or postal mail, as set out at <https://www.cisco.com/c/en/us/about/corporate-social-responsibility/ethics-office/ethicsline.html>.

## Acknowledgment to abide by this Policy

Suppliers are expected to acknowledge this Policy and to apply it in all dealings with, and on behalf of, Cisco. Failure to sign and return the Ethics Certification Form (a part of the Cisco Supplier Qualification package) may result in disqualification from consideration for business, and/or future business, with Cisco. Suppliers are fully responsible for ensuring that any employee, subcontractor, agent, or other third party assigned to provide services to Cisco, as permitted by agreement with Cisco, acts consistently with this Policy. If a Supplier has a question relating to its obligations under this Policy, or if a Supplier believes that Cisco, a partner, or a competitor does not comply with this Policy, the Supplier should immediately contact the Ethics Office at [ethics@cisco.com](mailto:ethics@cisco.com).

## A code of conduct specific to supply-chain suppliers

Cisco has adopted the Electronic Industry Citizenship Coalition (EICC) Code of Conduct (<https://csr.cisco.com/pages/supplier-code-of-conduct>) for supply chain suppliers. The Code reflects the basic tenets of responsible manufacturing agreed upon by the electronics industry. It is an evolving document that incorporates the feedback of Cisco, its peers, suppliers, customers, and outside stakeholders. Supply chain suppliers are expected to operate in accordance with the EICC Code of Conduct, which includes provisions covering responsible management in labor, health and safety, environment and ethics. Supply chain suppliers acknowledge and commit to the EICC Code of Conduct <https://www.eiccoalition.org/standards/code-of-conduct/> when they agree to the Cisco Supplier Ethics Policy.