

# OUR CODE OF CONDUCT

Living Our Values



# A MESSAGE FROM GEORGE KURIAN

**NetApp has earned a reputation as one of the best places to work in the world.** We strongly believe that this is because of you, our workforce, and the culture of ownership, company values, purpose, and accountability we've built together.

Our culture and values reflect who we are and how we fulfill our highest standards of commitment to all our customers, shareholders, employees, partners, and communities. As we continue to navigate a complex and changing business landscape, it's imperative to bring these same values into maintaining and upholding our Code of Conduct. The Code is a guide that helps us meet our obligations to our stakeholders while staying compliant with the law and our own policies. I count on all of you to know and follow these guidelines every day.

There may be situations where the right course of action is not obvious.

I encourage you to speak up and ask questions any time you face an ethical or legal dilemma.

Share your concerns any time you see or suspect a violation of our Code. There are many people and resources available to help you navigate these circumstances, including your manager, your HR business partner, the Legal Department, and our Integrity & Compliance Office. We are stronger and better as a business when we view our colleagues as teammates and collaborate with them as needed.

Adhering to our Code is a shared responsibility that requires all of us to take ownership and uphold NetApp's reputation for integrity and trust. Thank you for living our values and committing to act with the highest standards of integrity, every day.

**George Kurian**  
**Chief Executive Officer**

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# OUR VALUES

## We celebrate the individual at NetApp.

You can bring your unique perspective and help us change the world. What unites us is a core set of values that guide how we treat one another, how we build our communities, and how we put our customers first.

Respect, consideration, growth, responsibility—these values are the things you do anyway, **but here's what we value most.**

## Put the customer at the center:

- Know their journey and walk in their shoes.
- Show up with a strong point of view.
- Become their trusted, indispensable partner and ally.

## Care for each other and our communities:

- Be humble and kind (don't be a jerk).
- Work to make each other and our communities better.
- Build deep, authentic connections (and bust out of your silo).

## Build belonging every day:

- Become a visible champion.
- Make room for other voices and help them be heard.
- Embed diversity and inclusion into every decision.

## Embrace a growth mindset:

- Be in it to win it: Choose progress over perfection and celebrate success.
- Invest in yourself. Try new things—even if they're scary.
- Learn from new experiences and from each other.

## Think and act as owners:

- Bring your A-game (A is for accountability as well).
- Decide with confidence, act with integrity and speed.
- Create the future of today.



# COMMITMENT TO OUR STAKEHOLDERS

## Our customers

Put the customer at the center and earn their loyalty through products, services, and relationships that deliver new capabilities and unparalleled value.

## Our shareholders

Give our shareholders exceptional value through predictable performance and significant growth in revenues and profits.

## Our employees

Attract and retain a diverse workforce of performance-oriented employees who thrive by taking on challenging work in an inclusive environment and who are recognized and rewarded for their achievements and contributions.

## Our partners

Build and nourish partnerships to develop and deliver innovative, superior solutions for customers.

## Our neighbors

Foster positive relationships in the communities where we work and with our global neighbors.

# OUR CODE

**Acting with integrity is embedded in our company values and serves as the unshakeable foundation for corporate integrity.**

The values that we share define who we are as a company and what we can expect from each other.

## **Why we have a Code**

We strive to “think and act as owners” by deciding with confidence and acting with integrity and speed. Our Code is developed with our values as the foundation. It reflects our culture and our commitment to doing things the right way, for the right reasons, everywhere we operate in the world.

In a complex global market that is constantly moving and changing, the “right way” is not always obvious, and it’s not always easy. That is why our Code is such an important resource—it puts into practice our commitment to honor our values, comply with the law, our Code, and our policies, and protect our reputation.

## **Our Code applies to us All**

Our Code applies to everyone who works at NetApp, including all directors, officers, and employees globally. We also expect our partners, service providers, customers, suppliers, vendors, and contractors to work ethically, inclusively, and legally, consistent with the standards in our Code and our policies. Our Code does not create any rights to continued employment, and it is not an employment contract.



## What it means for you

Our continued success depends on your ability to make decisions that are consistent with our values, the law, our Code, and our policies. You have a responsibility to:

- Know and follow our values and commitments to our stakeholders.
- Know and comply with the laws and regulations related to your job in the country or countries where you do business.
- Know and follow our Code and our policies and processes.
- Ask for help. Our Code cannot address every law, policy, or issue, so it is important to ask for help if you are not sure what to do.
- Report concerns about suspected or actual violations of the law, our Code, or our policies. NetApp has a policy of not retaliating against anyone who reports concerns in good faith.
- Cooperate with any investigations.

- Always act in the best interests of NetApp.
- Complete our online Code of Conduct course and certification process.

Some countries, business units, or functions may adopt stricter specialized policies and processes that apply to relevant individuals who work at NetApp. You also have an obligation to follow any special policies or processes that apply to you.

### Managers' additional responsibilities

Supervising others is a privilege and a responsibility. If you supervise others, you have a responsibility to lead with integrity and to create an inclusive environment of trust and openness with your team. Be a positive role model, honoring and leveraging our differences. Recognize employees for their efforts, celebrate achievement, and create a workplace where employees feel comfortable coming forward with their concerns.

## Where to go for help

The Integrity & Compliance Office oversees and administers our Code and is your primary resource for any Code-related questions or concerns. The Global Business Conduct Council oversees the Integrity & Compliance Office's global compliance program and NetApp's ethics and compliance efforts generally. However, there are other resources to help you, such as your manager, your HR business partner, and the Legal Department. See the Resources and Contact Information chart at the end of this document for more information and contact details.

If it is not possible to raise or address an issue or concern with your immediate manager, or if you feel that your issue or concern is not being addressed appropriately, contact the next level of management, your HR business partner, the Legal Department, or the Integrity & Compliance Office. Also, you can always report your concern through the NetApp Compliance Hotline. Do not attempt to investigate a known or suspected violation on your own.

## Your responsibility to report concerns

The NetApp open-door policy encourages employees to report any concern they feel should be addressed to their manager, to their HR business partner, or to anyone at higher levels of management. You have the responsibility to report any suspected or actual violations of the law, our Code, or our policies. Failure to do so is a violation of our Code of Conduct.

### No retaliation policy

NetApp has a policy of not retaliating against anyone who reports concerns in good faith. You will not lose your job or your benefits or be demoted, suspended, threatened, harassed, or discriminated against for sharing your concerns in good faith. Anyone who violates our no retaliation policy will be subject to disciplinary action, up to and including termination with or without notice, in accordance with applicable law.

### NetApp Compliance Hotline

The NetApp Compliance Hotline is available 24 hours a day, 7 days a week, for you to report your concerns, where permitted by law. It is operated by an independent reporting service that allows you to speak up at any time. When you contact the hotline, you have the option of providing your name or making an anonymous report, where permitted by law.

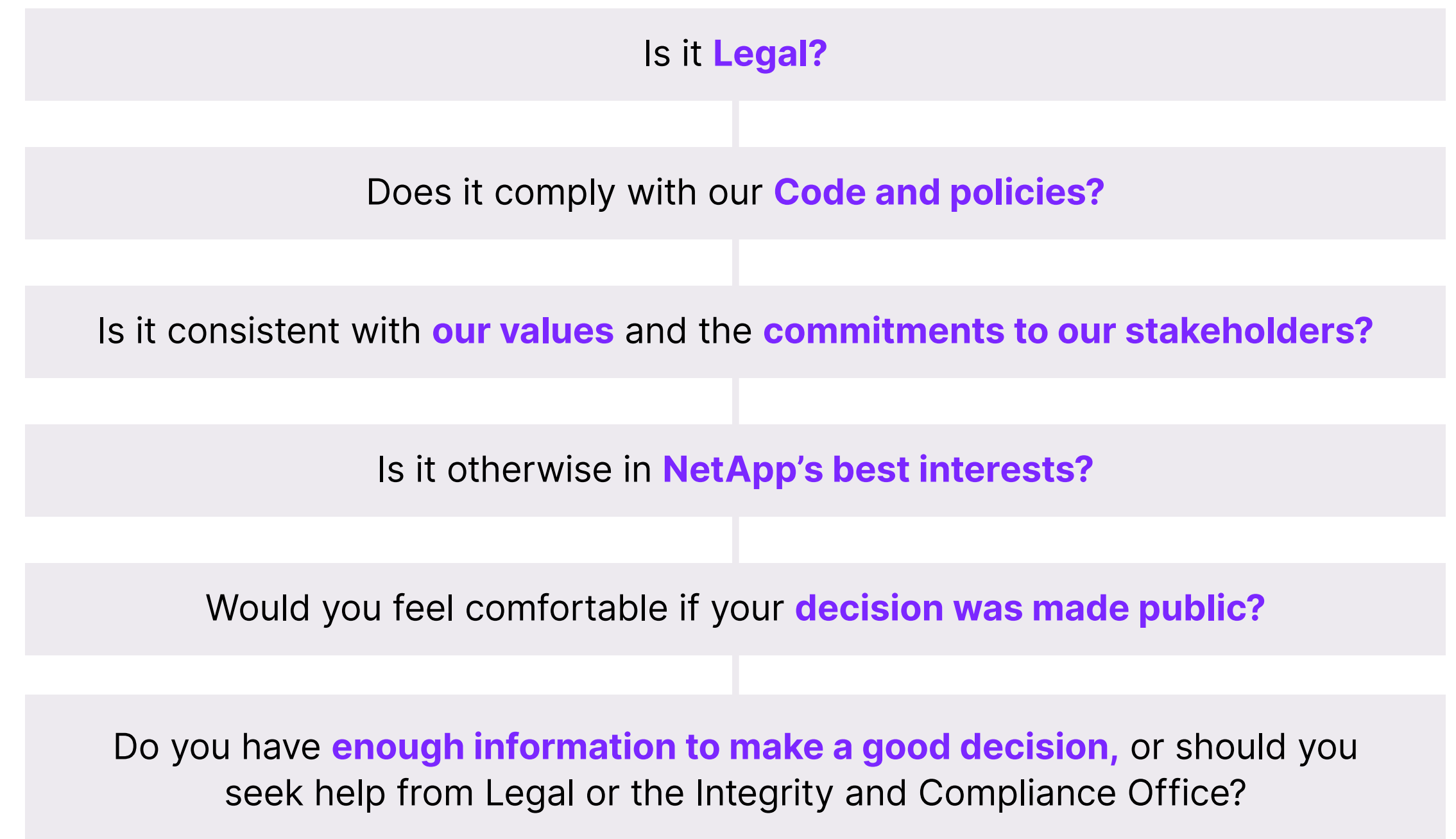
### Special rules for our hotline internationally

Some countries where NetApp does business may have specific laws related to whistleblowing. Also, NetApp may be obligated to inform the person who is the subject of a reported concern or violation that the report was filed, and that the person may exercise his or her right to receive information about the allegation and have an opportunity to respond.

### Ethics decision tree

Making good decisions isn't always easy. Our world is constantly changing and we must deal with competing interests, time pressures and other outside distractions. Our Code cannot cover every situation you might encounter but where the path isn't clear—our Code of Conduct guides us on the right course of action and helps us to make ethical decisions, in line with our values.

**If you are ever unsure of what to do, ask yourself these questions.**



**If the answer to any of these is no, do not do it.**  
If you are still unsure, ask for help.





### **Investigations**

Reported violations of the law, our Code, and our policies—and the facts and circumstances surrounding such reports—will be reviewed, investigated if appropriate, and treated confidentially to the extent possible under the law as determined by NetApp. More information can be found for our employees in our Speak Up policy available on the Integrity and Compliance Office site. When legally required or otherwise appropriate as determined by NetApp, NetApp may report compliance matters, facts, and circumstances to applicable government authorities and cooperate with any legal proceedings. Everyone who works at NetApp has a duty to cooperate fully with investigations and to promptly, completely, and truthfully comply with all requests for information, interviews, or documents to the extent permitted by local law.

Sometimes, an investigation will be conducted by people, agencies, or law firms outside of NetApp. You must not alter or destroy documents or records in response to an internal or external investigation or other legal request.

### **Waivers of our Code**

Requests for waivers must be submitted to the Integrity & Compliance Office in writing and approved in advance.

# OUR COMPANY

## We are committed to our company values.

We strive to achieve market leadership by living our values each day, building a strong culture, and fulfilling our commitments to our stakeholders.

### Following the law, our Code, and our policies

Following the law is at the heart of our Code. NetApp expects everyone who works at our company to follow the law—including U.S. laws that apply to NetApp globally. Our success in the global marketplace is tied directly to your knowledge of and compliance with the laws related to your job in the country or countries where you do business. Failure to follow these laws can result in lawsuits, civil and criminal penalties, fines, imprisonment, and other severe consequences for NetApp and for you.

We also expect everyone who works at NetApp to understand and follow our Code and our policies and to ask questions anytime you are unsure about the law, our Code, or our policies.

### Questions and additional information

Contact your manager, your HR business partner, the Legal Department, or the Integrity & Compliance Office with questions or concerns.



## Our company. Our values. Our Code.



Know the laws associated with your job in the country or countries where you do business.



Know and follow our Code and our policies wherever you do business.

### **Financial statements, regulatory filings, and business records**

Each of us has a responsibility to be accurate, honest, and complete in what we record and what we report in our financial statements, regulatory filings, and business records, including our contracts. It is a fundamental part of meeting our financial, legal, and business obligations. Disclosure of financial information in reports or documents submitted to regulatory authorities and investors must be full, fair, accurate, timely, and understandable. If you are involved in preparing disclosure documents, make sure that you are familiar with the requirements and never misrepresent or omit any material facts. Always comply with applicable legal requirements and generally accepted accounting principles as well as the internal and financial controls, policies, and procedures we have in place.

Follow our policies related to accurately documenting all partner, customer, supplier, vendor, contractor, and other contracts. All business relationships and terms should be properly and accurately documented using NetApp approved communication systems, such as NetApp contracts or email, and not unapproved messaging systems such as WhatsApp or WeChat. NetApp does not allow any “off-books” accounts, regardless of the purposes of the accounts. For further discussion of this topic, see the “Our Partners” section of this document.



Business records and communications can become public through litigation, investigations, or release in the media, so avoid exaggeration, colorful language, sarcasm or phrases or statements that could be misconstrued legal conclusions, and derogatory characterizations of NetApp, people, or other companies in NetApp communications including email, voicemail, recorded video meetings, instant messaging, and documents.

Comply with NetApp policies regarding the retention, storage, and disposal of information. Retain all company records, as described in our document retention requirements, and store them in approved storage locations. Records that have met their retention requirements and are not subject to a document preservation requirement or legal hold should be properly disposed of. The Legal Department or Integrity & Compliance Office preserve information relating to a specific topic when litigation is reasonably anticipated or for an internal investigation. You should never dispose of information that may be relevant to litigation or subject to a legal hold until you are authorized to do so by the Legal Department or the Integrity & Compliance Office.

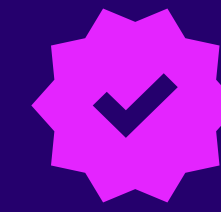
## THE NETAPP PERSPECTIVE:

**A public company is held to a higher standard of record keeping. Do your part to maintain accurate business records.**

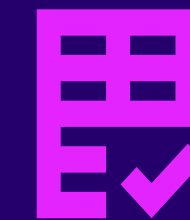
### Questions and additional information

Contact the Finance, Internal Audit, or Legal Department or the Integrity & Compliance Office with questions or concerns and report any misconduct, omission, inaccuracy, or falsification immediately. For additional information, see the Corporate Controller website.

## Our company. Our values. Our Code.



Make sure that the information you report in NetApp financial statements, regulatory filings, and business records, including contracts, is accurate, honest, and complete.



Remember, accurate recordkeeping is crucial to maintaining the successful operation of our business, the trust of our stakeholders, and compliance with the law and our policies.



Report immediately any suspected financial or business record misconduct or inaccuracy.

## THE NETAPP PERSPECTIVE:

# Corruption taints us all. Say something if you see it.

### Anti-bribery, anti-corruption

We are committed to winning business based on the merits of our products and not on unethical or illegal business practices. We have zero tolerance for bribery and corruption. Never give, offer, or accept, directly or through a third party, anything of value in exchange for obtaining (or retaining) business or an improper advantage.

### What could be defined as a bribe?

A bribe can take many forms, including a payment, a gift, a favor, a kickback, or an offer of entertainment or travel. Even a charitable or political contribution could be considered a bribe if offered on our behalf to influence a decision. Regardless of local practice or the practices of other companies, avoid even the appearance of something improper.

Understand and comply with the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act, as well as the anti-bribery and anti-corruption laws of the country or countries where you do business. The U.S. FCPA places strict limits on bribery of any non-U.S. government officials or employees of any non-U.S. state-owned entities.

Under the FCPA, a “government official” can broadly include not just elected officials but also employees of government-owned or controlled entities (like a ministry of health or ministry of education), political party officials, and even employees of public international organizations, such as the United Nations or the World Bank.

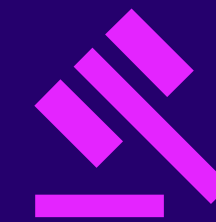


Never give anything of value to such individuals without receiving approval from the Legal Department or the Integrity & Compliance Office in advance. In most countries, anti-bribery laws also restrict bribery in a commercial context.

**NetApp prohibits its Employees and Third Parties from making facilitation payments on behalf of NetApp absent specific authorization by the NetApp Integrity & Compliance Office or the NetApp Legal Department, no matter how small the amount or how common or ordinary the payment may appear.**

Be aware that NetApp can be held responsible for bribes made on our behalf by third parties, including by our partners, customers, suppliers, vendors, and contractors. Exercise due diligence in the selection of business partners and avoid relationships with parties that have a history of corrupt practices and ensure third parties are consistently monitored. Ensure all payments including our discounts, rebates, commissions and Market Development Funds are never used as bribes.

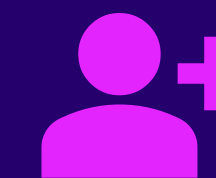
## Our company. Our values. Our Code.



Comply with anti-bribery and anti-corruption laws where you do business.



Do not give anything of value to a government official or state-owned entity employee without receiving approval in advance from the Legal Department or the Integrity & Compliance Office.



Exercise due diligence if you hire someone to work on our behalf.



Report suspected or actual acts of bribery or corruption to the Legal Department or the Integrity & Compliance Office.

### **Gifts, entertainment, and business courtesies**

The exchange of gifts, entertainment, and other business courtesies, such as travel, with partners, customers, suppliers, or vendors, is a common business practice and can promote goodwill. When gifts or entertainment are extravagant or frequent, however, they can compromise your objectivity or create the appearance of something improper. That is why NetApp has gifts, entertainment, and travel policies that define what is appropriate and what is not.

Remember, never give, offer, or accept a bribe. This can be anything of value given, directly or through a third party, in exchange for obtaining (or retaining) business or securing an improper advantage. All gifts, entertainment, and business courtesies must be appropriate for the business relationship and under local custom and law.

### **Giving gifts and other items**

You may give gifts, entertainment, or other business courtesies such as travel, to partners, customers, suppliers, vendors, or other business contacts according to our policies.

In general, you may give occasional gifts to commercial/private third parties that do not exceed US\$100 (or local currency equivalent) in value. You may also give occasional entertainment or other business courtesies to third parties that do not exceed US\$150 (or local currency equivalent) in value per person. The person or persons being entertained must have a potential or actual business relationship with NetApp.

NetApp has different limits and policies for providing gifts, entertainment, and other courtesies to government officials and state-owned entity employees—please go to the Integrity and Compliance office site or contact the Integrity and Compliance office by email—[ng-integrity@netapp.com](mailto:ng-integrity@netapp.com). Any exceptions must be approved in advance by your VP and the Integrity & Compliance Office.

### **Government officials and state-owned entity employees**

The rules for giving gifts, entertainment, and other business courtesies such as travel to government officials or state-owned entity employees are strict and we have different limits for each country. Do not give anything of value to government officials or state-owned entity employees, including gifts, entertainment, travel, or even a meal, without receiving approval in advance from the Legal Department, the U.S.

Public Sector (USPS) Legal Group, or the Integrity & Compliance Office. Never give anything of value for the purpose of improperly influencing an official decision or creating a reciprocal obligation.

### **Accepting gifts and other items**

In general, you may accept from third parties occasional gifts, entertainment, and other business courtesies such as travel that do not exceed US\$100 (or local currency equivalent) in value.

NetApp may have different limits for each country where we do business, which will be communicated separately. Any exceptions must be approved in advance by your VP and the Integrity & Compliance Office.

All gifts to employees that are expensed to NetApp must be in accordance with the Global Travel & Expense Reimbursement Policy & Procedures and the Global Expense Reimbursement Handbook.



## Our company. Our values. Our Code.



Know and comply with our policies as they relate to giving and accepting gifts, entertainment, and travel.



Be aware that NetApp may have different limits for each country, which will be communicated separately.



Obtain approval in advance from your VP and the Integrity & Compliance Office for any exceptions to our policies.

### **THE NETAPP PERSPECTIVE:**

**Never compromise your character. Gifting is a courtesy, not an opportunity for gain.**

#### **Travel and expenses**

All NetApp travel must be in accordance with the policies described in Global Travel & Expense Reimbursement Policy & Procedures.

#### **Accurate recordkeeping**

Our gift, entertainment, and travel policies require that you keep accurate records regarding your expenses in connection with your job. Any gift, entertainment, or business courtesy permitted under our policies must be transparent and recorded accurately in our corporate books and records and in your expense reports. When completing an expense report, always state to whom the gift, entertainment, or business courtesy was provided, whether a government official or state-owned entity employee was involved, the amount, and the purpose.

#### **Questions and additional information**

Contact the Legal Department or the Integrity & Compliance Office with questions or concerns. For additional information, see the Travel Portal and the Integrity & Compliance Office website.

**Follow our policies regarding recordkeeping and expense reports.**

Do not give anything of value to government officials or state-owned entity employees without receiving approval in advance from the Legal Department or the Integrity & Compliance Office.

**Prevention of money laundering**

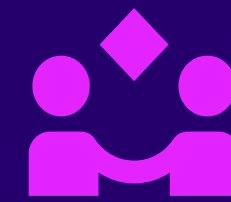
Money laundering is the process by which funds generated from criminal activity, such as drug trafficking, are moved through legitimate businesses in order to hide their criminal origin. NetApp employees, partners, service providers, customers, suppliers, vendors, and contractors must never knowingly facilitate money laundering and must take steps to prevent inadvertent use of NetApp's business activities for this purpose.

Any payment must originate from the invoiced party unless it has been approved by the Integrity & Compliance Office.

**Questions and additional information**

If you have questions or concerns relating to money laundering, contact the Integrity & Compliance Office.

## Our company. Our values. Our Code.



Be vigilant and exercise good judgment when dealing with customers and business partners.



Know who they are, what kind of business they are in, and the source of their funds. Immediately report any unusual or suspicious activities or transactions, such as attempted payment in cash or from an unusual financing source; arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer; requests to return cash collected to a place other than where it was received from; unusually complex deals that do not reflect a real business purpose; or attempts to evade recordkeeping or reporting requirements.

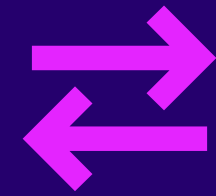


### Conflicts of interest

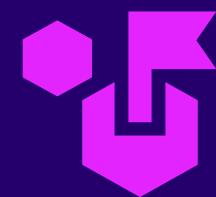
We expect that you will act and make decisions that are in the best interest of NetApp. Each of us has a responsibility to avoid activities that might affect—or appear to affect—our objectivity in making decisions for our company. Although it is impossible to list all the situations that could signal an actual or potential conflict of interest, there are certain areas where conflicts typically arise, such as:

- **Personal relationships.** Doing business with family members or friends, whether they work for NetApp or other companies with which we work, including third-party service providers, such as marketing, communications, food and beverage, consulting, storage, or processing vendors.
- **Outside employment.** Accepting outside employment that either interferes with the time, talent, or energy that you bring to NetApp; that has the potential for compromising NetApp proprietary, confidential information or intellectual property; or that may conflict with your responsibilities as a NetApp employee or that has the potential to reflect negatively on NetApp.
- **Board or advisory roles.** Serving on a board or in an advisory capacity where your service would conflict with your responsibilities as a NetApp employee.
- **Competitive activities.** Owning, working for, or doing consulting or other services for a business that is a NetApp competitor product or technology development. Developing a product or technology that could compete with NetApp's products or intellectual property.
- **Use of NetApp property.** Using NetApp's property, information, relationships, or position for personal gain.
- **Financial investments.** Investing in a company that is competitive with NetApp where the investment could create an actual or potential conflict of interest. Always use good judgment and avoid even the appearance of something improper. Transparency is the key to avoiding conflicts of interest. Disclose any actual or potential conflicts of interest to the Integrity & Compliance Office and receive approval before you engage in the activity.

## Our company. Our values. Our Code.



Ask yourself: Am I involved in any situation that could create—or appear to create—a conflict between my personal interests and the interests of NetApp?



Be familiar with the types of situations that may pose a conflict of interest.



Disclose any actual or potential conflicts of interest to the Integrity & Compliance Office and your manager using the Conflicts of Interest Disclosure Form and receive approval before you engage in the activity.

### **THE NETAPP PERSPECTIVE:**

**Every interaction should be transparent and ethical, advancing the customer's and NetApp's interests.**

#### **Questions and additional information**

Contact the Integrity & Compliance Office with questions or concerns. For additional information and the Conflicts of Interest Disclosure Form, see the Integrity & Compliance Office website.

### **Government contracting**

The sale of goods and services to customers owned in whole or in part by a government is heavily regulated and follows stricter rules than sales to commercial customers. The laws that apply to government contracting and to business communications with government officials, their prime contractors, and their agents are complex. If you contract with government customers, you have a duty to know and abide by all relevant statutory, regulatory, and contractual provisions and to avoid even the appearance of anything improper.

Promote an atmosphere of openness and transparency in your dealings. Be truthful and accurate in all reports, statements, certifications, bids, proposals, and claims. If you are involved in bidding on government contracts, respect the proposal and source selection processes, honor your obligation to protect confidential or controlled information, and comply with all security clearance requirements. Also comply with government inspections, investigations, or requests for information. If you receive an inquiry from a government official or agency, promptly contact the Legal Department or the Integrity & Compliance Office for assistance.



## THE NETAPP PERSPECTIVE:

### Government for the people means transparent ethical dealings with officials and representatives.

Any payments made to government agencies must be consistent with NetApp's policies and completely and accurately recorded in a timely manner and in reasonable detail. Remember, the rules for giving gifts to government officials or state owned entity employees are strict. Do not give anything of value, including gifts, entertainment, or even a meal, to government officials or state owned entity employees without receiving approval in advance from the Legal Department or the Integrity & Compliance Office.

Gifts must never be given for the purpose of improperly influencing an official decision. Never offer bribes, kickbacks, or preferential treatment to a government official in connection with a government contract.

#### Questions and additional information

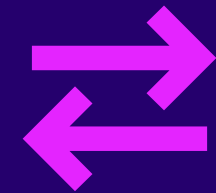
Contact the Legal Department or the Integrity & Compliance Office with questions or concerns.

## Our company. Our values. Our Code.

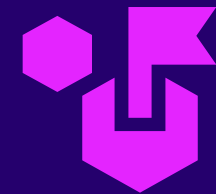


Be aware that the sale of goods and services to customers owned in whole or in part by a government is heavily regulated and follows stricter rules than sales to commercial customers. Understand and abide by the relevant statutory, regulatory, and contractual provisions and avoid even the appearance of anything improper. Ask for help if you are not sure what to do. Do not give anything of value to government officials or state owned entity employees without receiving approval in advance from the Legal Department or the Integrity & Compliance Office.

## Our company. Our values. Our Code.



Do your part to promote positive business relationships and fair business practices.



Know and comply with applicable antitrust and competition laws related to your job in the country or countries where you do business.

## THE NETAPP PERSPECTIVE:

**Fairness isn't just right, it's the law.**

### **Anti-trust and competition**

We believe in a thriving marketplace and free and open competition, and we expect every employee to promote positive business relationships and fair business practices. To comply with the letter and spirit of anti-trust and competition laws, do not communicate or enter into any kind of agreement or understanding—whether formal or informal, written or spoken—that relates to a competitive matter without first obtaining guidance and approval from the Legal Department.

Examples of anti-competitive business practices that could be prohibited under law include:

- Agreeing with a competitor or a NetApp partner (reseller, distributor, global systems integrator, service provider, or any other entity authorized to resell or distribute NetApp products) to raise, fix, or hold a price at which goods or services will be sold (price fixing).
- Agreeing in advance with a competitor or a NetApp partner as to who will submit the winning bid on a contract in a competitive bidding process (bid rigging).
- Agreeing with a competitor or a NetApp partner to divide markets or to sell only to customers in certain geographic areas (market division).
- Dictating or otherwise interfering with a NetApp partner's ability to set the price at which it offers NetApp products for sale (resale price maintenance).

### **Questions and additional information**

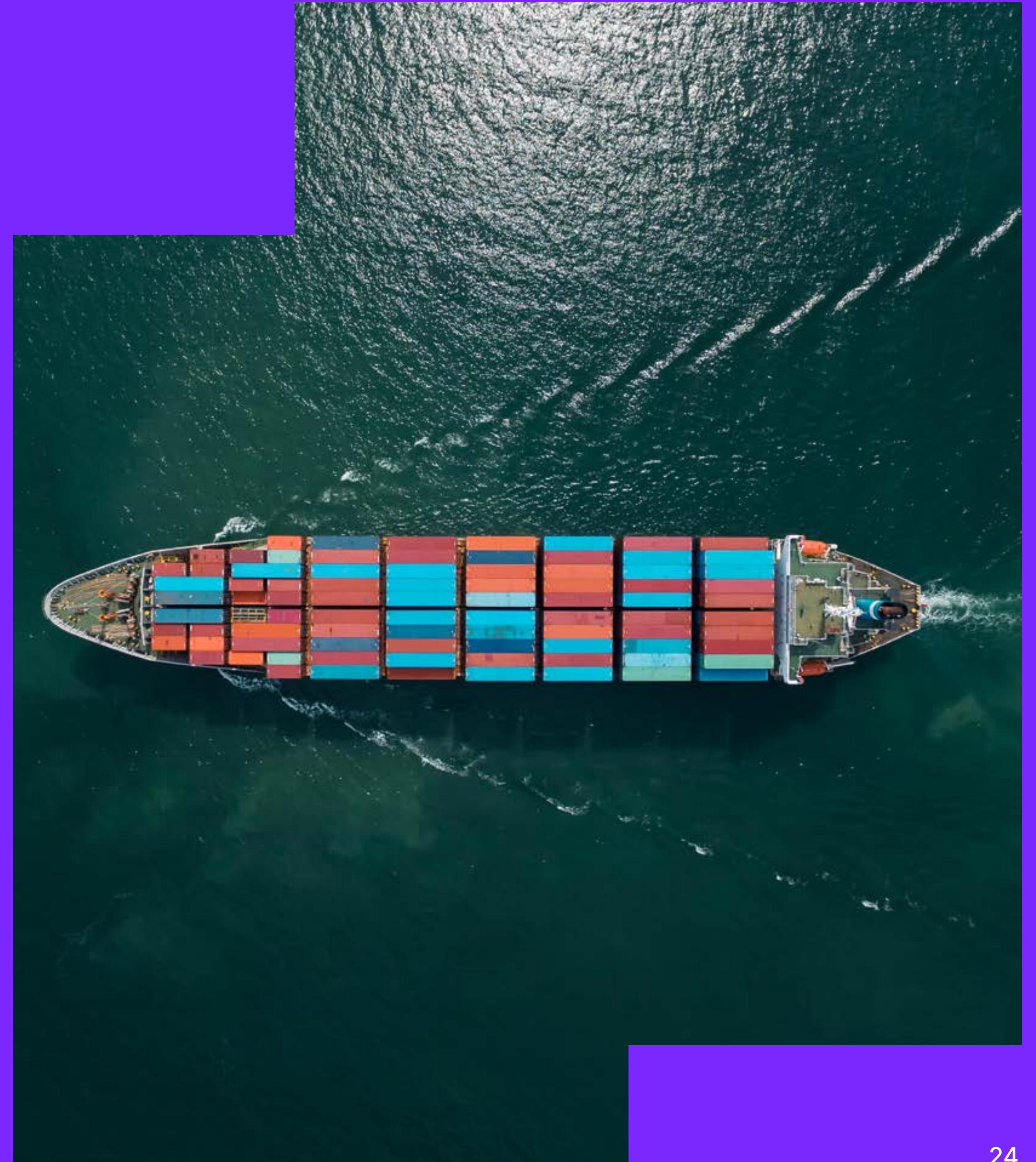
Contact the Legal Department or the Integrity & Compliance Office with questions or concerns.

### **Export controls, restricted countries, imports, and anti-boycott**

As a company that serves customers around the world, our products, technologies, and services are subject to a wide range of export controls, economic sanctions, customs regulations, and other trade compliance laws, including those of the United States and other countries. These regulations apply to all products, whether tangible or intangible, and whether shipped or released for revenue or nonrevenue purposes.

NetApp is committed to complying with the regulations governing products and technologies that move or are released across international borders and notes that our products may be regulated by trade laws of more than one country. U.S. export controls and economic sanctions laws are extraterritorial in nature and therefore apply broadly to our products, technologies, and services, including transactions related to these items that occur in countries outside the United States.

In addition, because our products are considered dual-use commodities (i.e. products and technology with both civil and military applications) they are also controlled by customs and export authorities around the globe. Export control regulations of the United States and other jurisdictions focus on the end use, end user, and end destination of products. Operationally, this means that our products are controlled for export to certain countries, entities, and persons as well as for certain end uses. Accordingly, in most cases, our products require government authorization in order to export.





## THE NETAPP PERSPECTIVE:

**We're a global company. Act in the best interests of NetApp within current laws.**

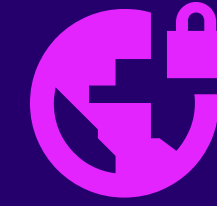
In compliance with U.S. and foreign regulations, NetApp prohibits exports to restricted parties, restricted entities, and restricted destinations without the appropriate government authorizations in place including Cuba, Iran, North Korea, Syria, and regions of Ukraine. Although it is easy to envision controls on tangible goods, it is important to know that export controls also apply to intangible transfers of technology via download or other types of releases of technology, including but not limited to visual inspection, oral exchange of information, emails, and transfers via the cloud. Information gathered by customs authorities is used to determine the admissibility of merchandise, trade statistics, and applicable rates of duty. To uphold compliance with these customs regulations, NetApp ensures accurate classification, country of origin, and valuation information as well as securing any necessary license or other authorization required for import.

Anti-boycott compliance bridges both U.S. export and U.S. Department of Treasury regulations. Anti-boycott regulations prohibit U.S. companies and their foreign subsidiaries or agents from participating in unsanctioned foreign boycotts, most notably the Arab League boycott of Israel. NetApp works cross functionally to identify and report any boycott-related requests.

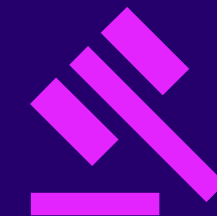
### Questions and additional information

Contact the Global Trade Compliance (GTC) team, the Legal Department, or the Integrity & Compliance Office with questions or concerns. For additional information, see the Global Trade Compliance website.

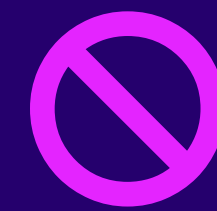
## Our company. Our values. Our Code.



Be aware that NetApp is subject to a wide range of export controls, economic sanctions, customs regulations, and other trade compliance laws, including those of the United States and other countries.



Understand that the export and import of NetApp's products, technologies, and services, whether for revenue or nonrevenue purposes, is highly regulated and violations can significantly impact our operations, result in civil and criminal penalties, and cause NetApp to lose its export privileges.



Never engage in conduct prohibited under U.S. anti-boycott laws.

## Protecting our confidential information

Our confidential information—including NetApp’s nonpublic business, financial, strategic, technical, and personal information—is among our company’s most valuable assets. This is information about NetApp, our products, or our customers, partners, suppliers, vendors, contractors, and fellow employees that you may have access to as part of your job. It can be written, spoken, or electronic, and may be any information that provides NetApp with a competitive advantage or that would be detrimental to NetApp if the information were disclosed.

### Confidential information includes:

- Information about our company, such as business strategies, marketing plans, proposed acquisitions, supplier and customer contracts, and customer lists.
- Information about our products, such as product research and development, technical specifications, hardware and software designs, firmware, manufacturing methods, patent applications, and product roadmaps.
- Nonpublic financial information, such as bookings and/or revenue data at any level, including product and area profit and loss statements, forecasts and projections, pricing strategies, budget information, and billing data.
- Personal information about our employees, such as their health, compensation, and performance information.
- Third party information, such as information about or from our partners, customers, suppliers, vendors, contractors, and other third parties that we have been entrusted to protect.

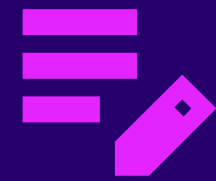
NetApp has a strong policy of protecting its confidential information and the confidential information of others with which it has been entrusted. All confidential information should be disclosed only to those persons who have a right and need to know the information and should be used only for the benefit of NetApp.

Confidential information should be treated with care and protected against unauthorized disclosure in accordance with NetApp’s policies and procedures. Companies or individuals outside of NetApp authorized to receive confidential information must sign a nondisclosure agreement before gaining access to our information. Whenever you are using confidential information, make sure that you limit the amount of information shared to only what is required, and make sure that the recipient understands any restrictions related to its use or dissemination.

Do not share confidential information with friends, family, relatives, the media, or any outside parties such as financial companies, research firms, or “expert networks,” and do not discuss confidential matters in public places where others could hear you.

Follow commitments that NetApp has made in any contract or nondisclosure agreement to any other company or individual. If you come to NetApp from another company, honor the promise you have made to protect that company’s confidential information. If you leave NetApp, your obligations do not end; you may not share NetApp proprietary and confidential information with your new employer or anyone else.

## Our company. Our values. Our Code.



Do not use or share the confidential information of your former employer or others without their written consent.



Do not disclose confidential information inside or outside of NetApp unless the recipient is authorized to receive it and needs it in order to do his or her job.



Enter into approved nondisclosure agreements before you share any proprietary and confidential information with anyone outside of NetApp who is authorized to receive it.



Take steps to protect confidential information by following NetApp's stated policies and procedures for handling confidential information.



Understand that your obligation to protect NetApp's confidential information applies both during your employment and even if you leave NetApp.



Protect our confidential information—it is one of our company's most valuable assets.

## THE NETAPP PERSPECTIVE:

**Our competitiveness depends on your discretion. Keep our secrets, please.**

**Protection of NetApp's confidential information is the responsibility of all employees.** Threat actors will attempt to fool employees through phishing emails and fake videos to attempt to gain access to critical information. Employees must be trained and vigilant to not click untrusted links and to verify the identity of other users before executing any business functions. NetApp identifying information, such as usernames and passwords, must never be shared. Always conduct NetApp business over NetApp approved communication channels. Report any suspicious activity to Global Security at [infosec@netapp.com](mailto:infosec@netapp.com).

### Questions and additional information

Contact the Legal Department or the Integrity & Compliance Office with questions or concerns.

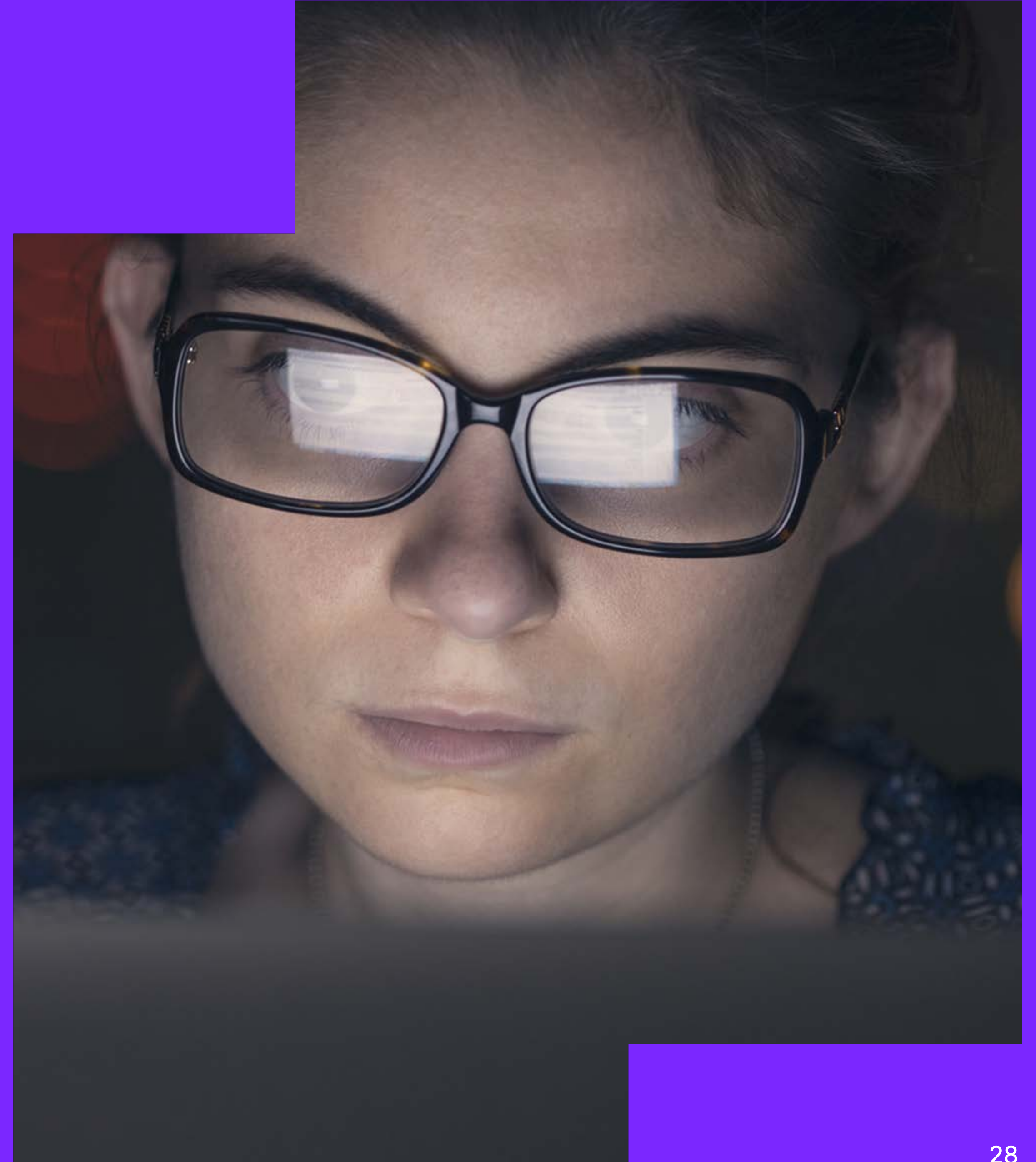
**When using AI tools, it is important that you follow current GenAI Ground Rules and Preliminary Usage Guidelines, and make sure that confidential or proprietary information is not entered into AI tools unless expressly allowed.** Incorrect use of GenAI outputs can impact NetApp's ability to ship products and may force NetApp to open source its source code. Following the GenAI Ground Rules will help you safely use GenAI while navigating the complex legal landscape surrounding its use.

### **Insider trading**

Your work at NetApp may expose you to material, nonpublic information about NetApp or companies with which we do business, making you an “insider.”

If you trade in securities while in possession of such information or disclose such information (“tipping”) to a person who trades, you could be subject to criminal and civil liability for insider trading. Information is “material” if a reasonable investor would consider it to be important in deciding to buy, sell, or hold stock. Information is “nonpublic” until it has been widely disseminated to the public market.

For example, NetApp’s quarterly financial results are considered material, and such results are considered nonpublic until one full trading day after the earnings release. Additional examples of material, nonpublic information include the gain or loss of a substantial customer or supplier; information about significant mergers or acquisitions; other significant transactions; changes in executive management; and significant changes in NetApp’s product offerings or technologies.



## THE NETAPP PERSPECTIVE:

**A hot tip will get you in hot water.  
Keep inside information inside.**

You may not trade in NetApp securities based on material, nonpublic information you have about NetApp, and you may not trade in the stock of companies with which we work if your job exposes you to material, nonpublic information about those companies.

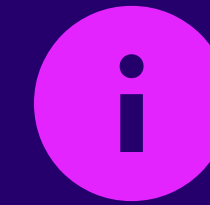
This policy also applies to anyone else living in your household and to anyone (whether or not living in your household) whose securities transactions are directed by or subject to your influence or control. Tipping material, nonpublic information is also a form of insider trading and is strictly prohibited.

Even the appearance of an improper transaction must be avoided. Keep in mind, insider trading is illegal.

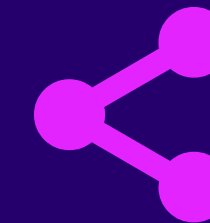
### Questions and additional information

Contact the Legal Department or the Integrity & Compliance Office with questions or concerns. To see the Insider Trading Policy, go to the Legal website or the Corporate and Securities website.

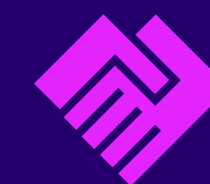
## Our company. Our values. Our Code.



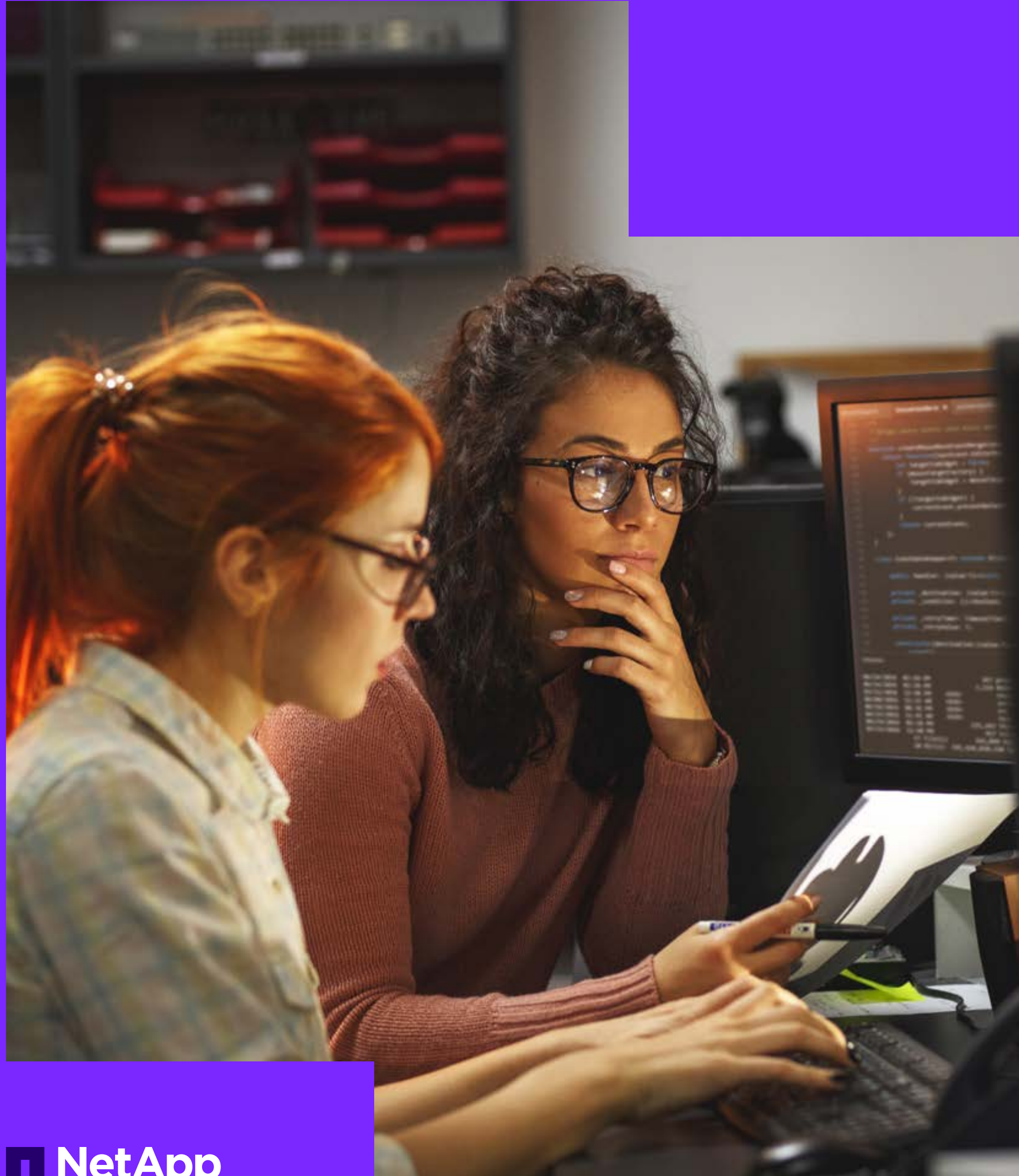
Know what kinds of information are considered material, nonpublic information and do your part to protect it.



Do not share material, nonpublic information with anyone.



Do not trade in NetApp securities or the securities of any other company (including our business partners or customers) if you possess material, nonpublic information. If you are not sure whether information is considered “material” or “nonpublic,” do not trade on it until you have consulted with the Legal Department or the Integrity & Compliance Office.



### **Data privacy, security, and governance**

Personal information is any piece of information that can be used, either directly or indirectly, to identify an individual, or that is related to an identified individual. It can be one data element, such as a name or account number, or a set of data elements strung together to identify a person, such as an employee ID, email address, and laptop serial number.

NetApp is committed to protecting the personal information of its customers, employees, and other individuals and has adopted policies designed to safeguard personal information from unauthorized use or disclosure.

Employees may collect, use, or access personal information only in accordance with NetApp policies and in compliance with applicable privacy and data protection laws. Protect personal information and other information in the country or countries where you do business. Prevent unauthorized access, use, or transfer of this information, and access it only as necessary for the performance of your job responsibilities.

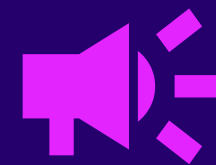
## Our company. Our values. Our Code.



Ask for help if you aren't sure whether data is protected and considered personal.



Protect all forms of personal data.



Speak up if you are given access to data that is not needed for your job. Immediately report data security breaches to the Legal Department or the Integrity & Compliance Office.

## THE NETAPP PERSPECTIVE:

**Data is our business and our customers' business. Protect it like it's yours.**

If you have access to personal information, you do not need, notify the information owner, the Legal Department, or the Integrity & Compliance Office so that your access rights can be terminated.

The proper governance of data, including proper transfer from country to country and properly securing it, is required to comply with the law and prevent data breaches. Unauthorized access to or use of data and data security breaches are serious violations of law, even when the data impacted is not personal information. NetApp may be required to notify the appropriate authorities, impacted people, or customers if a breach is suspected or has occurred. Notify the Legal Department or the Integrity & Compliance Office about any known or suspected unauthorized access to, or loss, disclosure, or alteration of data of any kind, including personal information or employee data.

### Questions and additional information

Data privacy laws can vary greatly by country or state. Contact the Legal Department or the Integrity & Compliance Office with questions or concerns.

# OUR PEOPLE

**We are committed to fostering a diverse and inclusive environment where all employees can thrive.**

We recognize that our employees thrive best when every individual is empowered to contribute their skills, capabilities, and perspectives. And when our employees thrive, our company can thrive.

We recognize the different talents, backgrounds, and perspectives of our global workforce. As such, we choose to build diversity, equity, inclusion, and belonging into the fabric of who we are—as a company, in how we work with others, and how we interact with the world.

**Our values based, people first culture guides all that we do.**

We attract and retain a diverse workforce of performance-oriented people who thrive by taking on challenging work in an inclusive environment, and who are recognized and rewarded for their achievements and contributions.





## Our people. Our values. Our Code.

### Working at NetApp

As the intelligent data infrastructure company, our values and business vision come to life via our employees, who are our greatest asset. We take pride in not only attracting and retaining the best talent in the industry, but also embracing a global diverse workforce of people who live and exemplify our values.

Employees who work at NetApp are expected to act responsibly, professionally, and according to our values and commitments to our stakeholders.

We foster an inclusive culture that promotes equal opportunities and treats everyone with dignity, fairness, and respect.

### Questions and additional information

If you see or suspect a violation of our policies, contact your manager, your HR business partner, the Legal Department, or the Integrity & Compliance Office.

You can also report your concerns via the NetApp Compliance Hotline.

NetApp has a policy of not retaliating against anyone who reports concerns in good faith.



Honor our commitments to building a model company.



Act responsibly and professionally and according to our values and our commitments to our stakeholders.



Know and comply with our policies.



## THE NETAPP PERSPECTIVE:

**Be kind and cast a wide net for ideas and talent in the workplace. Diversity is strength.**

### **Diversity, inclusion, and belonging**

Diversity, Equity, Inclusion & Belonging (DEIB) is a global, strategic imperative at NetApp and interwoven in our culture and company values, policies, and practices. We recognize that diversity leads to more innovation and better business outcomes.

We create a diverse, equitable, and inclusive community that values and celebrates our differences, promotes fairness and equity, and drives our collective success.

We empower our employees to foster inclusivity and build the culture of belonging aligned to our core values.

We are not just a company of products, but of people, all working together in the spirit of collaboration. We encourage collaboration and teamwork among individuals from diverse backgrounds and experiences.

### **Questions and additional information**

Contact your manager, your HR business partner, the Legal Department, or the Integrity & Compliance Office with questions or concerns. You can also report your concerns via the NetApp Compliance Hotline. NetApp has a policy of not retaliating against anyone who reports concerns or participates in an investigation in good faith.

If you see or suspect discrimination, or if you feel that you or another person has been discriminated against or treated unfairly, report it to your manager, your HR business partner, the Legal Department, the Integrity & Compliance Office, or the NetApp Compliance Hotline.

## Our people. Our values. Our Code.



If you see or suspect harassment, or if you feel that you or another person has been harassed, contact your manager, your HR business partner, the Legal Department, the Integrity & Compliance Office, or the NetApp Compliance Hotline.

### **THE NETAPP PERSPECTIVE:**

## **Don't be afraid to speak up, for yourself and for others.**

#### **A harassment-free workplace**

NetApp is committed to fostering a safe and inclusive environment for all employees. We believe that everyone deserves to work in an atmosphere free from harassment, discrimination, and any form of mistreatment. We have a zero-tolerance policy towards harassment, including, but not limited to sexual harassment, bullying, discrimination, and offensive behavior. Any form of harassment will not be tolerated. Your responsibility to promote a harassment-free work environment extends beyond the workplace to include company related meetings, events, situations, and practices including those held offsite.

#### **Questions and additional information**

Contact your manager, your HR business partner, the Legal Department, or the Integrity & Compliance Office with questions or concerns. You can also report any concerns via the NetApp Compliance Hotline. NetApp has a policy of not retaliating against anyone who reports concerns or participates in an investigation in good faith.

## **Safety and security**

We are committed to providing a safe, secure, and healthy workplace. We rely on you to follow all applicable workplace health and safety policies and procedures, attend any required training, and promptly report any unsafe conditions, accidents, or injuries that you experience or witness on the job.

Always observe good security practices.

Wear your NetApp identification badge whenever you are on NetApp premises and report any breach of security or suspicious behavior. Safeguard your passwords and any information or hardware that is assigned to you. Observe a clean-desk policy, secure information in locked cabinets, and lock your computer screen when you leave your work area.

We prohibit acts or threats of violence by or against our employees, contractors, or visitors at any time or place. Weapons and firearms of any kind are not permitted on NetApp property or at sponsored events, unless such rules are expressly prohibited by applicable state, federal, or local law.

If you feel unsafe or threatened, contact the Safety & Security team immediately for assistance.



## THE NETAPP PERSPECTIVE:

Comport yourself in a manner that is responsible and safe for you and your colleagues.

### Maintaining a drug-free and alcohol-free workplace

Alcohol, illegal drugs, and the abuse of controlled substances can adversely affect safety, productivity, attitude, reliability, and judgment. They have no place in the workplace. With the exception of lawful, moderate, and prudent alcohol consumption during legitimate business entertainment, NetApp employees are prohibited from being under the influence of alcohol while working, operating NetApp supplied equipment, or engaging in NetApp business. NetApp employees are prohibited from possessing, using, distributing, or being under the influence of illegal drugs or their metabolites. Even in places where medical or recreational marijuana use is lawful, marijuana possession, use, distribution, or being under the influence of marijuana while at work-related events remains prohibited under this policy. As a U.S. government contractor, NetApp cannot accommodate the medical use of marijuana where to do so conflicts with the law and/or our obligations to provide a drug-free workplace. Similarly, employees should not perform work when using any medication that has adverse effects on their ability to perform their job safely. Consult with your manager or Human Resources if you must use any medication that bears safety warnings that may impact your job.

### Questions and additional information

Contact your manager, your HR business partner, the Safety & Security team, or the Integrity & Compliance Office with questions or concerns. For additional information, see the Safety & Security website.

## Our people. Our values. Our Code.



Report any unsafe conditions, security breaches, threats, or violent acts.



Observe good security practices.

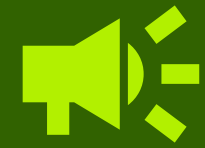


Behave in a professional and responsible manner; do not embarrass yourself or NetApp by your conduct.



NetApp is committed to a drug-free and alcohol-free workplace.

Our people. Our values. Our Code.



Protect NetApp—speak out against any acts of theft or fraud.

## THE NETAPP PERSPECTIVE:

**Crime never pays—and the truth is stronger than a lie.**

### **Theft and fraud**

We do not tolerate acts of theft or fraud.

Stealing money or property, failing to properly record time worked or paid time off, or attempting to misrepresent, cheat, or deceive (through words, conduct, or concealment) in order to obtain some benefit, financial or otherwise, is wrong.

Lying on an expense report, claiming overtime for hours not actually worked, not reporting time off, or being dishonest about meeting a sales target—all are prohibited acts.

### **Questions and additional information**

Contact your manager, your HR business partner, the Safety & Security team, or the Integrity & Compliance Office with questions or concerns.

### **Using NetApp resources**

Our assets are what give NetApp a competitive advantage in the marketplace. We trust you to respect them, use them to carry out company business, and protect them from damage, loss, misuse, and theft. NetApp assets include not only our technology, intellectual property, and information resources, but also our financial assets and the equipment and physical assets we use on the job. It is equally important that you respect the intellectual property rights of others and comply with all laws and contractual restrictions related to third-party intellectual property. Follow all intellectual property clearance processes or seek advice from the Legal Department before using proprietary information from outside the company. This includes open-source software. Any improper use of assets, whether NetApp's or a third party's, can damage our reputation and expose NetApp and you to legal liability. Use company assets to promote company business and protect them as if they were your own.

Technology resources, including hardware, software, email, voicemail, landline and mobile phones, intranet and internet access, and computer files and programs, are valuable company assets. We rely on you to use them appropriately and in accordance with the law and our policies. Use good judgment when accessing the internet from our systems—take care to never violate a law, harass other users, disclose confidential information, or interfere with network users, services, or equipment.

Never install unauthorized software, hardware, or storage devices on your NetApp or NetApp issued computer, mobile, and other devices, and do not access our network through unauthorized hardware, software, devices, or other means.

In accordance with the law, all communications, information, documents, intellectual property, and anything else you create or receive in the course of your employment are owned by NetApp, and you should have no expectation that these and your use of NetApp's network, applications, or assets, including such use on NetApp issued devices or your own personal devices that you use for performing your work, are private and confidential.

In accordance with the law, NetApp may, without notice, access, use, store, monitor, search, seize, review, transfer, and disclose communications, information, documents, intellectual property, and anything else that you create or receive in the course of your employment, including through NetApp's network, applications, or assets and NetApp issued devices and your own personal devices that you use for performing your work. NetApp may also respond to all valid court, law enforcement, governmental, and litigation requests, subpoenas, orders, and warrants; and maintain, monitor, and audit NetApp's network, applications, and assets and NetApp issued devices.

## THE NETAPP PERSPECTIVE:

It's a data-driven, connected world.  
Protect our IP and competitiveness  
through security and vigilance.

NetApp employees and alternate workforce members must only use NetApp assets for business purposes and in accordance with NetApp's policies and standards. Users are responsible for creating strong passwords and are required to securely store devices when not in use. A lost or stolen device must be promptly reported to [infosec@netapp.com](mailto:infosec@netapp.com) to protect NetApp information. Users must only have access to the information and systems that are required for them to do their job. Access to information must be strictly controlled to prevent unauthorized access or disclosure. Strong authentication must be used for all systems and devices required to do NetApp business. Credentials, like passwords, should never be shared and must be protected from unauthorized access through secure storage practices.

### Questions and additional information

Contact your manager, your HR business partner, or the Integrity & Compliance Office with questions or concerns.

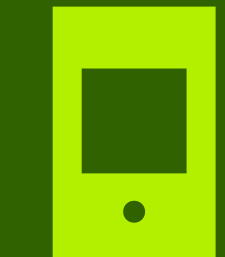
## Our people. Our values. Our Code.



Be a good steward of NetApp's assets.



Treat them with care and guard against waste and abuse.



Safeguard your NetApp resources, like your computer and mobile phone, and exercise good judgment regarding their use.



## Our people. Our values. Our Code.



Do not speak on behalf of NetApp unless you are authorized to do so.



To avoid confusion and present a unified message to NetApp's stakeholders, and in line with corporate policy, all inquiries by the media and other external parties are to be directed to [ng-uspr@netapp.com](mailto:ng-uspr@netapp.com). This policy covers all forms of responses to the media, including "off the record" and anonymous statements.

## THE NETAPP PERSPECTIVE:

**When in doubt: "No comment.  
Let me get back to you."**

### **Speaking on behalf of NetApp**

Careful communication is crucial for NetApp. Take care when communicating about NetApp. Our reputation, our brand, and our people can be harmed when information about the company is inconsistent, inaccurate, or incomplete. Only authorized individuals at NetApp should communicate externally to the media, our investors, financial analysts, and the government. Refer all inquiries from the media, research firms, or the public generally to our Communications team or Investor Relations team. Refer all legal or government inquiries to the Legal Department.

If you are publishing white papers, technical reports, or marketing presentations, follow our marketing guidelines and policies. If you have questions about whether certain information can be used or disclosed publicly, contact the Legal Department before offering legal advice or opinion.

### **Questions and additional information**

Contact the Communications team, the Investor Relations team, the Legal Department, or the Integrity & Compliance Office with questions or concerns.

## Using social media

We respect and encourage your use of social media as a means for exchanging ideas and building relationships. NetApp Nation is a great tool to use to amplify approved, NetApp priority content. As employees of NetApp, we are each a reflection of the brand. When posting to your personal social media accounts, it is the responsibility of each employee to use social media in a way that is consistent with our NetApp policies.

### Never post nonpublic company information on social media:

- Never use social media to post or display any material, nonpublic information about NetApp. This includes information in violation of NetApp's Insider Trading Policy, NetApp proprietary or confidential information, or any other NetApp information that should not be disclosed publicly.
- Always respect your obligation as a NetApp employee to protect NetApp proprietary and confidential information and the proprietary and confidential information of NetApp customers, partners, and companies with which we do business (use care when using location sharing).
- Always follow copyright, fair use, and financial disclosure laws.
- Ensure you adhere to financial earnings quiet period rules and guidelines.

### Foster inclusivity and maintain respect in what you post

- Apply rules of the workplace to your social media activity—if you would not say it, write it, or share it at the office, do not say it, write it, or share it online.
- Do not use social media to post or display comments about co-workers or managers that are vulgar, obscene, threatening, intimidating, harassing, or in violation of NetApp's policies against discrimination or otherwise.
- Do not post information about NetApp or people who work at NetApp, including personal data, on any social media unless you are authorized to do so. You are responsible for your published content and may be subject to legal liability and disciplinary action.
- Do not post obscene, discriminatory, or offensive language or images to your personal social media accounts. Remember, YOU are a reflection of NetApp's brand. Post with good judgement and responsibility.

## THE NETAPP PERSPECTIVE:

### Be social but be respectful and let NetApp officials speak for NetApp.

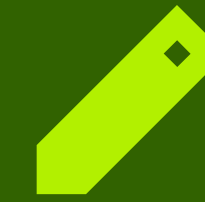
#### Personal verses NetApp proprietary owned social accounts:

- Understand the differences between personal and company social media accounts.
- Personal accounts are owned by the individual and include personal information and visuals, but not assets from the NetApp Brand Site, including corporate logos, icons, photographs, and other assets. Again, [NetApp Nation](#) is a great tool for sharing NetApp approved, priority content to your personal social media pages.
- Company social media accounts are owned by NetApp, contain NetApp branding, and are created for a strategic purpose.
- All company social media accounts, as well as its contracts, are property of the company, and login credentials for all company social media accounts must be shared with the Social Media team.

#### Questions and additional information

Contact your manager, the Voice to Market team, the Legal Department, or the Integrity & Compliance Office with questions or concerns.

## Our people. Our values. Our Code.



Be responsible with your use of social media and do not post information about NetApp, co-workers, or managers, or any personal data, unless you are authorized to do so.



Apply the rules of the workplace to your social media activity—if you would not say it, write it, or share it at the office, do not say it, write it, or share it online.



Comply with relevant policies, including NetApp's Insider Trading Policy and NetApp's Social Media Policy.

# OUR PARTNERS

**We build and nourish business relationships to develop and deliver innovative, superior solutions for our customers.**

## **Ethical and legal partnerships**

We understand the value of having excellent business partnerships with our partners, service providers, customers, suppliers, vendors, and contractors, and we work to build these relationships based on integrity and mutual trust. We conduct our business consistent with our values, the laws, our Code, our policies, and our agreements.

We rely on you to act in the best interests of NetApp with respect to our business partnerships and to apply fair, legally compliant business practices. We also expect our partners, service providers, customers, suppliers, vendors, and contractors to operate ethically, in compliance with the law, and in a manner that is consistent with the standards of our Code and our policies. Our partners' failure to do so can lead to serious issues for NetApp. All representations made by our employees and third parties acting on our behalf must be current and accurate.

## **Questions and additional information**

Contact your manager, the Legal Department, or the Integrity & Compliance Office with questions or concerns.



## Our partners. Our values. Our Code.



Do your part to build our business partnerships based on integrity and mutual trust. Act in the best interests of NetApp with respect to our business partnerships. Remember, for all of our business partnerships, you also have a responsibility to follow the law, our Code, and our policies.

## THE NETAPP PERSPECTIVE:

Everything you do should be open and above board.

### **Sales contracts, policies, and processes**

When it comes to ethical sales practices, compliance with the law is always the starting point. You have a responsibility to understand and comply with the laws that are relevant to your job in the country or countries where you do business. These laws include those related to accurate financial statements, regulatory filings and business records, anti-bribery and anti-corruption, gifts, entertainment and business courtesies, government contracting, anti-trust and competition, and export controls, as discussed in the “Our Company” section of this document.

In addition to the law, there are NetApp sales policies and processes with which you must comply when entering into any sales agreement on behalf of NetApp. For example, our Worldwide Rules of Engagement Policy: Working with Partners outlines the required actions and behaviors for working with NetApp’s partners to ensure that we treat them fairly and consistently, while complying with legal requirements. Similarly, our Global Bookings Policy ensures that we are aligned with our practices and comply with applicable regulatory requirements.

## THE NETAPP PERSPECTIVE:

There is always pressure to make a sale.  
Don't let pressure compromise your ethics.

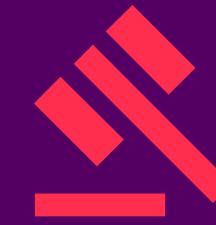
### This policy requires that:

- You completely and accurately document the entire offer and price for products and services, and they are accepted by the customer, in accordance with policy. This means that we have clear evidence of the complete arrangement and that there are no side agreements, whether oral or written, and no “quid pro quo” arrangements.
- All elements of the arrangement, such as shipping and payment terms, and all contingencies, are explicitly indicated in the forms of documentation required by the policy.
- The company with which we are dealing is considered creditworthy and collection of what we are owed is probable.
- The business partners must be vetted and approved through NetApp's due diligence process; we avoid relationships with parties that have a history of corrupt practices. Certain sales practices are prohibited because they violate our commitment to conducting business honestly and ethically. For example, we do not allow accounts that are not properly and accurately recorded in our financial records (“off-books” accounts), concessions, side agreements or letters, alteration of sales documents, and future roadmap commitments.

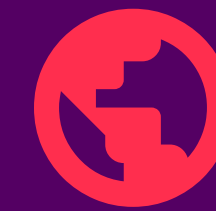
### Questions and additional information

Contact your manager, the Finance Department, the Legal Department, or the Integrity & Compliance Office with questions or concerns. For additional information, see the Finance website.

## Our partners. Our values. Our Code.



Be sure that you comply with the law wherever you do business and that the sales and business practices you employ are honest and ethical.



Know and comply with our sales policies and processes, including our Global Bookings Policy or Rules of Engagement Policy.



If you are a certifier through the sales certification process, document any exceptions you know about fully and accurately.



All business relationships must be properly documented; avoid “off-books” accounts.

## Our partners. Our values. Our Code.



If you are responsible for selecting or hiring third parties, follow our procurement policies, use objective criteria in making your selection (and don't let personal relationships or gain influence your decision), and monitor them on a continuous basis.



Communicate to all individuals conducting business on our behalf the importance of acting in a manner consistent with the law, our Code, and our policies.



If you work with a third party, make sure that our contracts clearly address responsibilities and risks and that the invoices they submit to us are honest, accurate, and complete.

## THE NETAPP PERSPECTIVE:

**Our extended network should be held to ethical purchasing standards, too.**

### **Procurement from suppliers, vendors, and contractors**

We treat our suppliers, vendors, and contractors with integrity and professionalism, and in our dealings with them we observe all applicable procurement standards. We select these third parties on the basis of objective criteria such as quality, price, service, experience, capability, and reliability, and we monitor their performance to ensure a high level of accountability and transparency. We hold third parties to the same high standards to which we hold ourselves. We expect that anyone who conducts business on our behalf will operate ethically, in compliance with the law, and in a manner that is consistent with the standards of our Code and our policies.

Be aware that NetApp can be held responsible for the actions of the third parties with which we partner. If your job involves selecting or working with a third party, help them understand the standards of business conduct we expect and report any conduct by a third party that appears to be inconsistent with these standards to the Legal Department or the Integrity & Compliance Office.

### **Questions and additional information**

Contact the Global Procurement team, the Legal Department, or the Integrity & Compliance Office with questions or concerns.

## THE NETAPP PERSPECTIVE:

Fair business practices should extend far outside our organization. Keep a level playing field.

### Supply chain relationships

We source components and assemblies for our products from suppliers in many different countries around the world. Each country has its own laws and regulations governing business dealings, purchases, duties, taxes, and transportation of products and goods. We are committed to operational excellence and compliance with applicable laws and regulations in our global supply chain, which include labor practices, integrity of materials, quality control, environmental compliance, export control and other trade laws, and safe handling and delivery. We hold our suppliers to the same high standards to which we hold ourselves.

We expect that anyone who conducts business on our behalf will operate ethically, in compliance with the law, and in a manner that is consistent with the standards of our Code and our policies, including our Conflict Minerals policy. We expect our suppliers to comply with our Supplier Code of Conduct which refers to ensuring fair wages, safe working conditions, reasonable working hours, and the prohibition of forced labor and child labor, while also respecting workers' rights to freely associate and bargain collectively.

We promote strategic relationships with our suppliers, discuss mutual business opportunities, and are willing to introduce our sales representatives to our suppliers and partners. We do not entertain "quid pro quo" arrangements or alter our business with suppliers, vendors, or contractors if they use solutions from our competitors.

### Questions and additional information

Contact the Global Procurement team, the Legal Department, or the Integrity & Compliance Office with questions or concerns.

## Our partners. Our values. Our Code.



Comply with applicable laws and regulations at every layer of the NetApp supply chain.



Seek help if you have questions or concerns about third parties involved in our supply chain.



## Our partners. Our values. Our Code.



Gather competitive information through ethical and legal means.



If you receive confidential information that you are not authorized to view, or if you suspect that someone is violating our policies regarding the gathering of competitive information, contact the Legal Department or the Integrity & Compliance Office.

## THE NETAPP PERSPECTIVE:

**We love a fierce competition, but it should be fair and legal.**

### **Gathering information about competitors**

Although it is standard practice in any industry to gather information about competing companies and their partners, customers, suppliers, and vendors, we have a responsibility to do so legally and ethically. Use good judgment and exercise caution in collecting and handling information about competitors. Never acquire information through improper means or enlist someone else to do so on your behalf. Do not seek information about competitors' bid pricing for transactions where NetApp is competing for business. Gathering information through market research, product evaluation, and review of publicly available information is acceptable. Acquiring it through improper means is not. Do not obtain a competitor's confidential information from its current or former employees or from any partners, customers, suppliers, or vendors with which they do business. If you receive any competitor information that you believe to be confidential or obtained through inappropriate means, contact the Legal Department or the Integrity & Compliance Office.

### **Questions and additional information**

Contact the Legal Department or the Integrity & Compliance Office with questions or concerns.

# OUR NEIGHBORS

**We foster positive relationships in the communities where we work and with our global neighbors.**

## **Environment, social, and governance management**

NetApp is committed to contributing to the success of our partners and customers, to delivering value to our shareholders, and to positively impacting the communities where we work and live. We firmly believe that we can accomplish these objectives concurrently with our commitment to effective environment, social, and governance (ESG) management.



## THE NETAPP PERSPECTIVE:

NetApp builds a sustainable future through its ESG efforts.

**As part of this commitment to create a lasting business for the future, we aim to:**

- Maintain strong governance structures to ensure that we conduct business in alignment with the highest standards.
- Prioritize environmental sustainability as a duty that we owe to society today and to future generations.
- Hold our suppliers and business partners to the highest ethical, social, and environmental standards.
- Stay committed to diversity, inclusion, and belonging and to maintaining our strong global reputation.
- Extend our culture of caring and service to communities around the globe. NetApp's ESG goals and accomplishments are described in our annual ESG report. All of these efforts enable NetApp to remain a good corporate citizen and create a model company in the communities where we live and work.

### Questions and additional information

Contact your manager, your HR business partner, the Legal Department, or the Integrity & Compliance Office with questions or concerns.

## Our neighbors. Our values. Our Code.

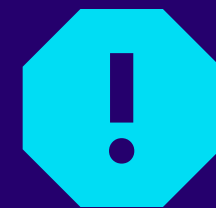


Support NetApp's commitment to being a good corporate citizen.

## Our neighbors. Our values. Our Code.



Respect the human rights of people in the communities where we operate.



Report any human rights abuse in our operations or in those of our business partners.

## THE NETAPP PERSPECTIVE:

Care for each other and our communities by preventing exploitation and abuse.

### Human rights

Our obligation to people extends to those outside of our corporate walls. We support the principles established under the United Nations Universal Declaration of Human Rights and prohibit the employment of underage children, forced labor, and human trafficking, as well as any form of physical punishment or abuse.

We expect suppliers throughout our global supply chain to share our commitment to the same high standards. We produce a modern slavery and human trafficking statement each fiscal year that outlines the steps we take to promote human rights and transparency in our supply chains.

### Questions and additional information

Contact your manager, your HR business partner, the Legal Department, or the Integrity & Compliance Office with questions or concerns.

### **Charitable and political activities**

Our core values include caring for each other and our communities. We encourage and empower you to volunteer and/or give to eligible nonprofits via the following social impact initiatives, which are all open to full-time employees:

- Volunteer Time Off (VTO) – Up to 40 hours of paid volunteer time off per employee, per fiscal year.
- Volunteer Grants – Track your volunteer hours on [NetApp.Benevity.org](https://NetApp.Benevity.org) to earn \$15 for every volunteer hour logged, up to a \$2,000 combined cap with Matching Gifts per fiscal year.
- Teambuilding Volunteer Grants – When you volunteer as a team of five employees or more, you can earn a \$50 grant for each participating employee, up to \$5,000 per event.
- Board Volunteer Grants – When you serve on the board of a nonprofit organization, you can apply for a \$1,000 Board Volunteer Grant each fiscal year.
- Matching Gifts – NetApp will double your personal donations to eligible nonprofits, dollar for dollar, up to a combined \$2,000 cap with Volunteer Grants per employee, per fiscal year. Request your matching gifts at [NetApp.Benevity.org](https://NetApp.Benevity.org).

**Eligible nonprofits are registered 501(c)(3) organizations or equivalent described under section 501(c)(3) of the Internal Revenue Code.**



## THE NETAPP PERSPECTIVE:

Care for each other and our communities through personal service and financial support.

### Ineligible organizations, regardless of tax status, include:

- Any organization that discriminates on the basis of race, color, religion, gender, national origin, ancestry, age, disability, medical condition, genetic information, veteran status, marital status, pregnancy, gender expression, gender identity, sexual orientation, or any other characteristic protected by federal, state or local law, regulation, or ordinance will be ineligible.
- Political and/or lobbying 501(c)(3) organizations.

**Unless you receive approval in advance, do not use or donate NetApp funds or assets (including facilities, equipment, or trademarks), seek reimbursement of a donation, or suggest that NetApp has supported or endorsed a charitable or political cause, issue, or candidate.**

### Questions and additional information

Contact your manager, your HR business partner, or the Integrity & Compliance Office with questions or concerns. For additional information, see the NetApp Serves website.

## Our neighbors. Our values. Our Code.



See the NetApp Serves website for ideas about how you can volunteer using the Volunteer Time Off program.



Receive approval in advance to use NetApp funds or assets.

# RESOURCES

Resource	Contact Information
<b>Integrity &amp; Compliance Office</b>	<b>Email:</b> ng-integrity@netapp.com <b>Email:</b> ng-privacy@netapp.com <b>Website:</b> <a href="https://netapp.sharepoint.com/sites/LegalCentral/SitePages/Integrity-and-Compliance-Office.aspx">https://netapp.sharepoint.com/sites/LegalCentral/SitePages/Integrity-and-Compliance-Office.aspx</a> <b>Website:</b> <a href="https://netapp.sharepoint.com/sites/LegalCentral/SitePages/Data-Governance.aspx">https://netapp.sharepoint.com/sites/LegalCentral/SitePages/Data-Governance.aspx</a> <b>Mail:</b> NetApp, Inc. Attention: Integrity & Compliance Office 3060 Olsen Dr. San Jose, CA 95128
<b>NetApp Compliance Hotline</b>	You can report concerns for all countries via the Internet or over the phone by following instructions found here: <a href="https://secure.ethicspoint.com/domain/media/en/gui/62854/index.html">https://secure.ethicspoint.com/domain/media/en/gui/62854/index.html</a>
<b>Human Resources</b>	<b>Submit an AskHR ticket:</b> <a href="https://netapphris.service-now.com/askhr">https://netapphris.service-now.com/askhr</a> <b>Website:</b> <a href="http://hr.netapp.com/home/">http://hr.netapp.com/home/</a>
<b>Legal Department</b>	<b>Email:</b> ng-legal@netapp.com <b>Website:</b> <a href="https://netapp.sharepoint.com/sites/LegalCentral">https://netapp.sharepoint.com/sites/LegalCentral</a>
<b>Audit</b>	<b>Email:</b> ng-internal-audit-compliance@netapp.com <b>Mail:</b> NetApp Board of Directors Audit Committee c/o Corporate Secretary 3060 Olsen Dr. San Jose, CA 95128
<b>Safety &amp; Security</b> <b>Workplace Experience</b>	<b>Email:</b> sas24@netapp.com <b>Website:</b> <a href="http://sas.netapp.com/">http://sas.netapp.com/</a>
<b>Global Trade Compliance</b>	<b>Email:</b> gtc@netapp.com <b>Website:</b> <a href="https://netapp.sharepoint.com/sites/GlobalOperations/SitePages/Global-Trade-Compliance.aspx">https://netapp.sharepoint.com/sites/GlobalOperations/SitePages/Global-Trade-Compliance.aspx</a>
<b>Global Procurement</b>	<b>Website:</b> <a href="https://netapp.sharepoint.com/sites/Procurement/SitePages/Home.aspx">https://netapp.sharepoint.com/sites/Procurement/SitePages/Home.aspx</a>

# LEARN MORE

→ Learn more at [www.netapp.com](http://www.netapp.com)

## About NetApp

NetApp is the intelligent data infrastructure company, combining unified data storage, integrated data services, and CloudOps solutions to turn a world of disruption into opportunity for every customer. NetApp creates silo-free infrastructure, harnessing observability and AI to enable the industry's best data management. As the only enterprise-grade storage service natively embedded in the world's biggest clouds, our data storage delivers seamless flexibility. In addition, our data services create a data advantage through superior cyber resilience, governance, and application agility. Our CloudOps solutions provide continuous optimization of performance and efficiency through observability and AI. No matter the data type, workload, or environment, with NetApp you can transform your data infrastructure to realize your business possibilities. [www.netapp.com](http://www.netapp.com)



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