



1.0 PURPOSE

The Enterprise Conflict of Interest Policy (the “Policy”) is intended to define situations that may constitute a conflict of interest and address the procedure for disclosing any real, potential or apparent conflict. It is every employee’s duty, as explained in the Enterprise Code of Conduct, to protect our organization against any damage that conflict of interest may cause.

2.0 SCOPE

This Policy applies to all employees, executives, officers and directors of F5 Inc., its subsidiaries and affiliates worldwide (“F5”), fulltime contingent workers and related third parties. The requirements of this Policy apply regardless of the local customs and practices of a foreign country.

3.0 POLICY STATEMENT

A conflict of interest occurs when your personal interests interfere (real), may interfere (potential), or has the appearance (apparent) of interfering, in any way with the interests of the company. While the definition may sound simple, conflicts of interest manifest in myriad ways, not all of which are obvious. In our business, personal and professional relationships are often deeply interconnected. It becomes a problem if your personal relationships or interests make it difficult to perform your job objectively and effectively.

Conflict of Interest: What to Watch For

For illustrative purposes, the following situations may constitute a Conflict of Interest depending on certain circumstances:

- Parallel employment or business activity. Performing a parallel activity or job in another company or engaging in outside business activity while the employee is working for F5, may create a conflict of interest situation. This parallel activity or job may be allowed with prior authorization from the F5 manager in charge, as long as this does not interfere in any way with the interests of F5.
- Board Participation. Having a direct/indirect participation, undertaking or representation on the Board of a company that is a supplier, consultant, competitor, subsidiary, customer or related non-profit organization of F5.
- Hiring F5 business partners for private purposes. Hiring any F5 supplier, consultant, competitor, customer, or related non-profit organization for private purposes.
- Related Third Parties. The establishment or maintenance of business or family relationships with or ownership in any F5 supplier, vendor, independent contractor, consultant, competitor, subsidiary,



customer, or related non-profit organization outside of an employee's work with F5, who can directly or indirectly influence said business relationship.

- The giving and receipt of gifts, travel, entertainment or anything of value, with the intention to benefit or unduly influence a F5 employee or related third party.
- Improperly disclosing or personally using confidential information relating to F5.

Conflict of Interest: When It Happens

In order to protect yourself as a F5' related third party and F5's organization, all our third parties are required to immediately disclose any situation that may constitute a conflict of interest by emailing the Business Integrity Office. The disclosed information will be analyzed to determine whether there is a conflict of interest or not and communicate any necessary mitigating measures.

4.0 DEFINITIONS

Fulltime contingent worker. An individual hired by a third-party company to perform specific duties or projects for F5 on a fulltime basis during a set period. This definition does not include independent contractors or vendors who contract directly with F5.

Conflict of Interest. Situations where the unbiasedness of employees in their conduct, judgment and professional actions while working in F5 are influenced (real) may be influenced (potential) or appear to be influenced (apparent) by family, relatives, friends, romantic, commercial, equity and financial relations (Related Parties).

Related Third Parties. Any person who has a relationship with the employee related to:

-Family by blood, marriage or social-affective (dating/romantic) which include in general but not limited: spouse, partner, girl/boyfriend, children, parents, siblings, cousins, uncles, niece, nephews, parents in law, son/daughter in law and siblings in law (Relatives).

-Parallel employment relationships with managers, colleagues, collaborators in other company.

-Business partnerships, direct/indirect participation, undertaking or representation in the Board of a company.

-Commercial, employment or family relationships with F5 Suppliers, vendors, customers, service providers, contingent workers, independent contractors, subsidiaries, competitors, business partners, etc.

-Government officials or public entities relations.

Government official. Any person who works for government agencies, at either the Federal, State or Municipal level, direct or indirect, national or international, in public administration, in addition to the entities which equate to them, such as public companies, joint stock companies and private companies that have government concession to provide public services to the population.



5.0 RESPONSIBILITIES

F5's related third parties. Any F5's business partner, reseller, distributor, vendor, customer, competitor, non-profit that is involved in a conflict of interest situation with a F5' employee or other F5's related third party, must disclose the situation immediately by [notifying the Business Integrity Office](#) in accordance with the F5 Partner Code of Conduct (Third Party Code of Conduct). The Business Integrity Office will assess the disclosure to determine an appropriate resolution.

6.0 ENFORCEMENT

Failure to follow this Policy may result in disciplinary actions, up to and including the termination of the business relationship with F5.

7.0 EXCEPTIONS

Exceptions to this Policy are not permitted.

8.0 DOCUMENT MANAGEMENT

This Policy is to be reviewed at least once every three years.

9.0 RELATED POLICIES & PROCESSES

F5 Third Party Code of Conduct (F5 Partner Code of Conduct)
Business Integrity Hotline Radar Site