



## **1.0 PURPOSE**

To promote an open-door culture to report suspected misconduct without fear of retaliation, and to prevent and remediate any violations of law.

## **2.0 SCOPE**

This Whistleblower & Non-Retaliation Policy (the “Policy”) applies to all F5 Employees and Third Parties as defined below. This Policy is applicable to our entire Company worldwide. All of us are subject to this Policy. We are expected to become familiar with and comply with this Policy, both in letter and spirit. In addition, we have a responsibility to participate in training, and to communicate the values underlying this Policy in our interactions with fellow F5 Employees and Third Parties.

## **3.0 POLICY STATEMENT**

### **Reporting Misconduct**

In our industry, we rely on security and trust. We’ve built our ethical standards on compliance with our Code of Conduct and both the spirit and the letter of the law. All F5 Employees and Third Parties should comply with our Code of Conduct and all local, state, and federal laws in the countries in which we operate.

Any F5 Employee or Third Party who becomes aware of misconduct or suspected misconduct is strongly encouraged to report it through one of the Company Resources listed below. F5 Employees and Third Parties should report even a reasonable suspicion of misconduct if it is made in Good Faith. Firsthand or full knowledge of the facts is not required to make a report in Good Faith.

The Company will not, however, tolerate malicious or intentionally false reports.

When making a report (either orally or in writing), please provide as much detail as possible under the circumstances, such as names, specific actions or omissions related to the alleged misconduct, dates of the alleged misconduct, and supporting documents.

### **How to Make a Report to a Company Resource**

Whenever you have any concerns or questions relating to the F5 Code of Conduct or any applicable laws you are always encouraged to discuss your concerns or questions with your F5 managers, any F5 leader or your point of contact with F5.

If however your concern or question involves an observation of Misconduct or is matter which requires investigation you should make a report to one of the following Company Resources:

- Human Resources Business Partners
- Company’s General Counsel
- Company’s VP of Business Integrity



- Company's Compliance Managers
- Business Integrity Hotline:
  - Online at [f5.ethicspoint.com](https://f5.ethicspoint.com)
  - By phone by calling (855) 409-0974. For a list of phone numbers outside the U.S., go to [f5.ethicspoint.com](https://f5.ethicspoint.com)

If you wish to do so, you may report known or suspected violations anonymously, if allowed by local laws. However, providing your name may expedite the time it takes F5 to thoroughly investigate and respond to your concern. Either way, the information that you provide will be treated as confidential (including the confidentiality of the identity of the reporting person and any Third Party mentioned in the report), and F5 will treat the information as confidential unless it must be disclosed further to a necessary and proportionate obligation imposed by local laws. Where the EU Whistleblower Directive applies, in such cases, the reporting person will be informed before their identity is disclosed unless such information would jeopardize the related investigations or judicial proceedings.

Any report made to a Company Resource will be acknowledged within a period of seven days and a response will be provided to the whistleblower within reasonable period of time, which shall not exceed three months unless the nature and complexity of the report are such that six months are required.

Nothing in this Policy shall prevent any person from making a written or oral report to an appropriate and competent external authority as allowed by local laws.

Due to certain requirements of data protection laws in Europe and other locations, the Company may be obligated to inform the subject of a reported violation that the report was filed and how he or she may exercise his or her right to access and correct the information regarding the allegation. However, in most jurisdictions, this right to know or access information should not entitle the subject of the allegation to information identifying the person who reported the allegation, or any Third Party mentioned in the report.

#### **Non-Retaliation**

The Company strictly prohibits retaliation, threats of retaliation, attempts of retaliation or other adverse action taken against any Employee or Third Party who either (1) reports Misconduct or suspected Misconduct in Good Faith, or (2) cooperates in Good Faith with an investigation (3) is obstructed from making a Report in the first place. Retaliation itself violates the F5 Code of Conduct and is cause for disciplinary action, up to and including termination of employment or service (subject to local law).

An Employee or Third Party who believes he or she has been retaliated against for speaking up, making a Report, or cooperating in an investigation should immediately report the incident to one of the Company Resources.

#### **4.0 DEFINITIONS**

For the purposes of this policy, the following terms used in this policy shall have the meanings described as follows:



**Company or F5:** F5, Inc. and its worldwide subsidiaries and affiliates.

**Company Resource:** Only the following persons, group of persons or resource can investigate allegations of Misconduct:

- Company's Human Resources Business Partners
- Company's General Counsel
- Company's VP of Business Integrity
- Company's Compliance Managers

**Compliance Manager:** A Compliance Manager reporting to the VP of Business Integrity.

**Employee:** Any current, former and prospective F5 director, officer, employee or intern, regardless of location or nationality.

**Good Faith:** The person making the report must make the report in good faith and have reasonable grounds for believing that the content of the disclosure is true at the time of making the report.

**Human Resources Business Partners:** Senior Human Resources ('HR') Professional who typically provide the following support to assigned business groups: process improvement, recruiting, policy and procedure applications, talent management, performance management, employee relations, compensation.

**Misconduct:** Examples include, but are not limited to, any violations relating to:

- Corporate reporting and disclosure
- Accounting and auditing controls and procedures
- Insider trading, fraud to shareholders or other breach of Securities Law
- Conflicts of interest
- Any violation of the F5 Code of Conduct, F5 Partner Code of Conduct (Third Party Code of Conduct), Company policy or law or regulation
- Any criminal offence
- Any health and safety endangerment
- Any damage to the environment
- Public procurement, financial services, money laundering and corporate taxation



- Consumer protection or privacy
- Any deliberate concealment of any of the matters set out above
- Any retaliation, threat of retaliation, attempts of retaliation or other adverse action for reporting concerns in Good Faith or cooperating with an internal investigation

**Report:** To give an oral or written account to one of the Company Resources of Misconduct that an F5 Employee or Third Party has become aware of or suspects in Good Faith.

**Third Parties:** Third parties acting on behalf of F5 such as contractors and subcontractors and any persons working under their supervision, agents, resellers, distributors, joint venture partners, suppliers, vendors and other representatives.

## 5.0 RESPONSIBILITIES

### F5 employee's responsibilities and Conduct

All F5 employees are responsible for reinforcing the F5 Code of Conduct and all Company policies. All employees must also be receptive to F5 third party's concerns and foster an environment where such third parties can raise questions without fear of retaliation.

In order to ensure that investigations are conducted fairly and independently, employees who become aware of potential misconduct should refer the matter to the Company Resource for investigation. Only Company Resources can investigate allegations of Misconduct.

### F5 Third Parties Responsibilities and Conduct

F5 third parties are expected to cooperate and provide complete, accurate, and truthful information in connection with any investigation (subject to any rights they may have under applicable local laws).

## 6.0 ENFORCEMENT

If an investigation undertaken pursuant to this Policy reveals that an F5 Employee or Third Party acted inconsistently with F5's Code of Conduct, other policies, or the law, the Employee or Third Party will be disciplined appropriately, up to and including termination of employment or the business relationship with F5, and—where warranted—potential legal action. In those cases, the Company will follow local law and disciplinary procedures as well as applicable employment contracts and collective agreements. In addition, if an Employee violates the law, F5 will cooperate with the appropriate authorities to the extent required by law.

To the extent that any provision of this Policy is contrary to applicable law, the provisions of law supersede the Policy, which will be implemented in compliance with such law.



## **7.0 EXCEPTIONS**

While all of us at F5 are expected to know and follow this Policy, some exceptions may exist. For example, if specific conduct is permitted under this Policy, but is prohibited by local law, you must comply with local law. The identity of the person making the report may be disclosed only where there is a necessary and proportionate obligation imposed by European Union or national law in the context of investigations by national authorities or judicial proceedings. If such a disclosure is warranted, appropriate safeguards shall be put in place and reporting persons shall be informed before their identity is disclosed unless such information would jeopardize the related investigations or judicial proceedings.

## **8.0 DOCUMENT MANAGEMENT**

This document is subject to management processes that control Enterprise-wide policy document development, revision, management approval, communication, publication, acknowledgement, and review.

This policy shall be reviewed at least once every three years.

## **9.0 RELATED POLICIES & PROCESSES**

F5 Enterprise Code of Conduct