



Code of Conduct

Empowered  
by Integrity



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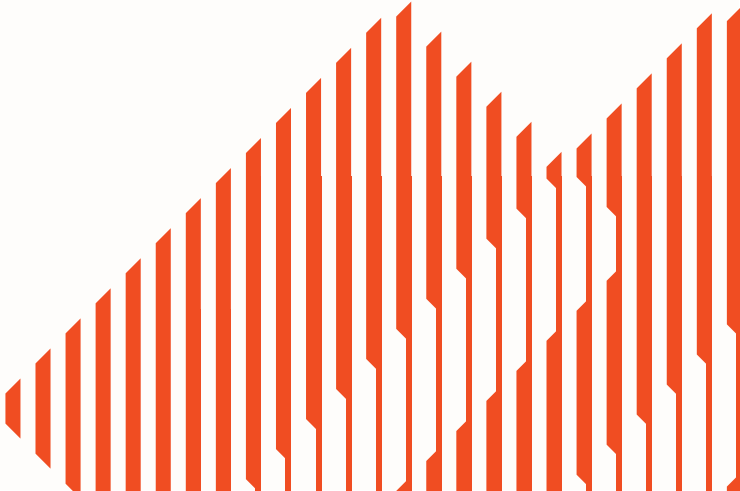
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# CEO Message



As our world evolves at an unprecedented pace, Palo Alto Networks continues to grow, innovate, and protect the global digital way of life. Amidst these changes, our Company Values remain the foundation of every business decision and interaction. We are **Empowered by Integrity** and committed to conducting our business ethically and honestly — helping create a world where each day is safer and more secure than the one before. We hold ourselves to the highest standards of ethical conduct and expect the same from our partners and suppliers. Our relationships are built on trust and respect and never compromised by illegal or unethical business practices.

At Palo Alto Networks, we must always be mindful of how our actions reflect on our reputation — and when we make decisions **Empowered by Integrity**, we show the world why we are the cybersecurity partner of choice.

Our Global Code of Business Conduct & Ethics outlines the behavior expected of all employees, reaffirms our Values, and asserts our commitment to acting with integrity in all that we do. The right decision may not always be readily apparent. Our Code, along with our Company policies, will help guide your ethical decision-making at Palo Alto Networks.

I trust each of you to uphold our Code and associated policies and to help ensure that our business partners do the same. Speak up if you encounter any behavior that doesn't meet our ethical standards by reporting it to our ethics helpline, anonymously if you'd like, or contact the Global Ethics Team. We prohibit retaliation against anyone who reports a potential violation in good faith.

Together we are **Empowered by Integrity** to create a safer, more secure world.

Thank you.

A handwritten signature in black ink, appearing to read 'Nikesh Arora'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nikesh Arora

# Our Mission, Vision, and Values

At Palo Alto Networks, our mission is to be the cybersecurity partner of choice, protecting our digital way of life. We work together to create a world where each day is safer and more secure than the one before. While the world around us changes every single day, one thing remains constant: The success of Palo Alto Networks is determined by our commitment to conduct our business ethically and with integrity.

## At Palo Alto Networks, we value:



### Disruption

We take risks fearlessly, solve real problems with new ideas, and challenge entrenched beliefs and look to the future.



### Execution

We're committed to quality and strive tirelessly for simplicity and usability.



### Collaboration

We rely on each other, seek to empower, and open ourselves to accountability.



### Integrity

We inspire trust, respect our customers, partners, and shareholders, and take pride in the work we do – because we do it the right way.



### Inclusion

We believe diversity strengthens our ideas and our business, and we strive to reflect the diversity of our customers in the diversity of our Company.

Our values define who we are at Palo Alto Networks, and our customers and partners trust us because of our commitment to our values. We are all **Empowered by Integrity**, which means that we all are responsible for holding ourselves to the highest standards of ethical conduct.

# Why Do We Have a Code and How Should We Use It?

This Code highlights our commitment to be **Empowered by Integrity** by setting forth our expectations for how we conduct our business anywhere in the world and our obligations under the law. Our Code serves as a framework for how we do things at Palo Alto Networks. The Code is a high-level overview of the most important things that you should keep in mind during your work here. And, if you need additional guidance on a topic, our Company policies referenced throughout the Code will provide additional detail. While this Code cannot address every possible situation that may arise, always remember that we expect you to act with the highest degree of integrity and to avoid taking any actions that may undermine the trust in and reputation of Palo Alto Networks.

We should all use this Code as a resource for how to conduct our business in line with our Palo Alto Networks mission, vision, and values.

**As you review the Code, you will see the following learning aids to help guide you in each topic area:**



### “Ask Yourself...”

provides questions for you to consider to gauge if a situation feels right.



### “Executing Integrity”

provides additional clarifying examples in a topic area and further expands how you can live our values in the workplace.



### “Secured by Our Values”

ties each section back to Palo Alto Networks’ values and highlights the “big picture” of each topic.



### “Terms to Know”

defines terms or provides additional details about a topic.



### “Look Out For...”

highlights important risks or gray areas for you to watch out for in certain topics.



### “Related Resources”

references and links to related policies and resources that you can refer to for more information on a topic.

# Who Must Follow the Code?

Our Code applies to all of us at Palo Alto Networks, Inc. and its subsidiaries, including all employees, officers, and members of our board of directors. Failure to comply with our Code including the completion of any associated mandatory training may result in disciplinary action, up to and including termination.

We also expect all the organizations and individuals that we partner with and those who do business on our behalf to act in a manner consistent with our values and our commitment to integrity.



# Additional Responsibilities for Managers

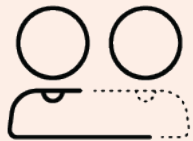
Palo Alto Networks managers are **Empowered by Integrity** to lead our teams and work proactively to influence ethical behavior. With leadership comes additional expectations and responsibilities, including:



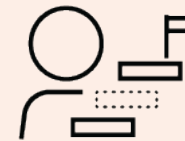
**Being a role model** and leading with actions that are in line with our Code and Company values



**Emphasizing the importance of our Code and training** to employees as ways to facilitate further education and continuous improvement, and making sure that employees complete mandatory training



**Setting a positive example** by discussing our Code with employees and explaining how it applies to our work every day



**Creating an ethical work environment** where employees feel safe to ask questions and share concerns without fearing retaliation

# Your Voice Matters: Speaking Up

## How Do I Speak Up?

At Palo Alto Networks, being **Empowered by Integrity** means feeling comfortable speaking up with concerns that you have about ethical misconduct or violations or potential violations of our Code, policies, or the law. We know that speaking up is not easy. But we can only address the ethical issues that are brought to our attention.

If you have questions or concerns about ethical conduct, please contact:

- Your manager or another trusted manager
- [The Employee Relations Team](#)
- [The Global Ethics Team](#)
- [Our Chief Compliance Officer](#)

You can also share your concerns with us through our third-party EthicsHelpline, which has an option to remain anonymous, if you prefer:

- Online: at [www.paloaltonetworks.ethicspoint.com](http://www.paloaltonetworks.ethicspoint.com)
- By Phone: For employees in the United States, call 1-855-266-7042. For employees outside of the United States, you can select the appropriate phone number for your country listed at [www.paloaltonetworks.ethicspoint.com](http://www.paloaltonetworks.ethicspoint.com).





# Your Voice Matters: Speaking Up (continued)

## What Happens When I Speak Up?

When you speak up, we will listen. We will review and appropriately address all reports. You can find detailed information about our investigative process by referencing our [Frequently Asked Questions](#).

Our Code requires you to fully cooperate with all Company investigations, audits, and management inquiries. Providing false or misleading information or intentionally omitting information is a violation of this Code and may lead to disciplinary consequences, up to and including termination.

Speaking up helps to protect Palo Alto Networks, our employees, shareholders, customers, and business partners. We expect you to speak up about your good faith concerns, including, among others, corruption and fraud, cyber security and information security, and any conduct or behavior that violates this Code and may harm our reputation for doing business with ethics and integrity. Speaking up enables us to address your concerns, resolve issues as fast as practicable, and operate safely and lawfully.

## The Investigation Process at Palo Alto Networks

From reporting a concern to completion of the process.



The full Investigation Process can be viewed [here](#).

# Your Voice Matters: Speaking Up (continued)



## **Our Commitment to No Retaliation**

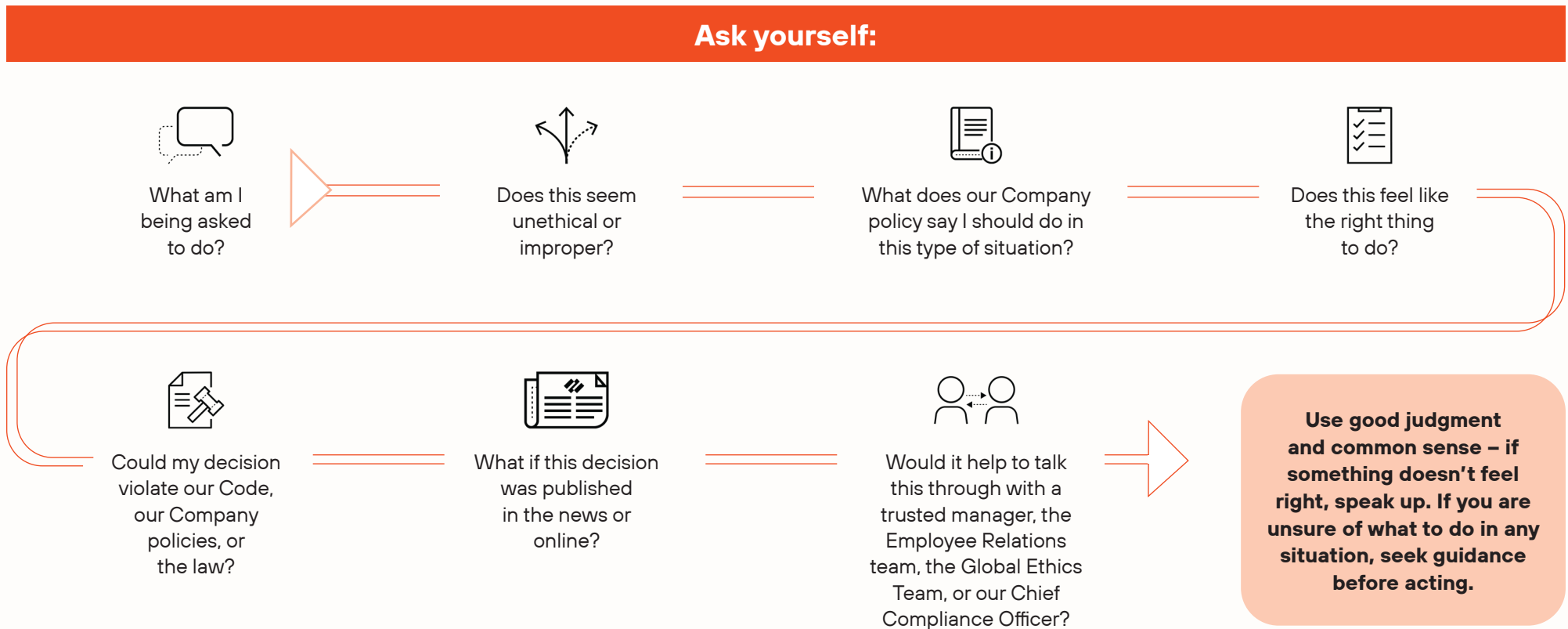
We know that speaking up or raising concerns takes courage — and we take the concerns you share very seriously.

Palo Alto Networks does not tolerate any form of retaliation. We're committed to supporting anyone who speaks up in good faith about a potential violation or potential misconduct and will not tolerate retaliation. Retaliation not only violates our Code, but it may also violate the law. If you feel that you are being treated differently because you raised a good faith concern about a possible violation of this Code or related Company policies, procedures, or guidelines, we urge you to report it immediately. The sooner you speak up about your concerns, the sooner we can address the issue.

# Ethical Decision Model

When we take responsibility and follow our Code and Company policies, we are **Empowered by Integrity**. We all are responsible for making decisions that reflect our Company values each day.

Always “Ask First, Act Later” if you are confronted with an ethical issue. It can be helpful to ask yourself a few questions to help determine how to make an ethical decision in the workplace. Here are a few steps to keep in mind:



# Mutual Respect

Everyone deserves to be treated with respect and dignity at work. We all thrive and work better as a team when we feel welcomed and supported, which is why Palo Alto Networks is committed to maintaining a workplace free of harassment, discrimination, and bullying of any kind – from our employees or from anyone who represents or works with us.

## How We Empower Integrity:

- Understand how to recognize harassment and timely report any behavior that violates this Code and our Respect in the Workplace policies and Employee Handbook.
- Make employment-related decisions based on an individual's qualifications and experience – not on characteristics such as race, religion, gender, gender identity, disability, age, or other protected characteristics.
- Do not use Company resources or external platforms associated with your role at PANW to share personal views that do not align with the Company's values of Inclusion and Integrity. Keep work discussions professional and respect diverse views and opinions.
- Speak up and report harassment, even if it is not directed at you.
- Be aware that managers have additional responsibilities to act if they have concerns or have knowledge about harassment.



## Terms to Know

**Harassment** is behavior based on a protected category that creates a hostile work environment. In the case of sexual harassment, this includes unwelcome sexual advances, requests for sexual favors, or other conduct of a sexual nature that negatively affects the work environment.

**Discrimination** is basing an employment decision on a protected category.

**Bullying** is hostile or offensive behavior that is egregious and has no legitimate business justification.

**Protected categories** include sex, race, national origin, age, disability, religion, sexual orientation, and many other categories protected by Company policy or applicable law.

For full definitions of these terms, please refer to the applicable Respect in the Workplace policy.

# Mutual Respect (continued)



## Secured by Our Values

We care about our employees and strive to foster a workplace that reflects our Company's value of Inclusion. We hold each other accountable to the highest standards of mutual respect because when we treat each other the way we wish to be treated, we all win.

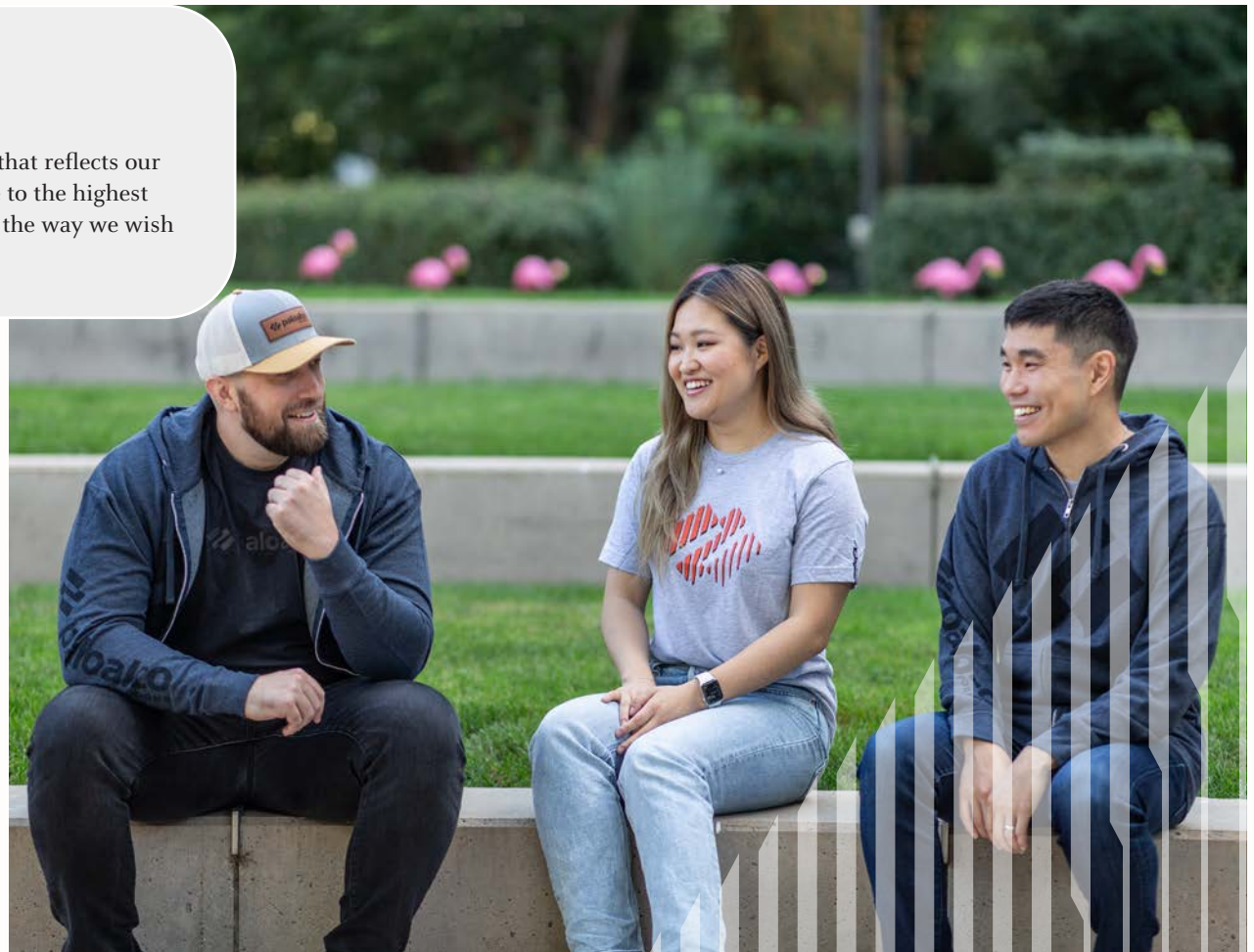


### RELATED RESOURCES:

[Respect in the Workplace Policy](#)

[Social Media Policy and Guidelines](#)

[Social Media Best Practices for Employees](#)



# Inclusion and Diversity

Each of us plays a role in creating a work environment where everyone can feel like they are seen, heard, and valued each day. We know that different perspectives, abilities, backgrounds, and experiences drive the success of Palo Alto Networks. Our Company is committed to equal employment opportunity, respect, and inclusion.

## How We Empower Integrity:

- Act inclusively towards everyone, and never exclude others from normal workplace conversations or interactions.
- Celebrate the diversity that makes our team stronger, respecting everyone's cultures, backgrounds, talents, experiences, pronouns, and other individual characteristics.



## Executing Integrity: Being Inclusive

Here are some additional ways you can be inclusive in the workplace:

- Treat people the way they want to be treated – not the way that you want to be treated.
- Seek opinions and input from everyone on your team when resolving issues or dilemmas – including from someone who may have an opinion that differs from your own.
- Use gender-neutral pronouns when sending communications or giving a presentation.



## Secured by Our Values

Inclusion is one of our core values, and we believe that our diversity strengthens our ideas and our business. Our employees reflect the diversity of the world around us, which leads to enhanced innovation in our products and services.

# Environment, Health, and Safety (EHS)

Palo Alto Networks is committed to maintaining a healthy and safe work environment. We do not tolerate violence and threatening behavior in the workplace. Palo Alto Networks prohibits use of illegal drugs, intoxicants, or controlled substances by anyone who is conducting Company business or is located on Company premises. We are all responsible for complying with the health and safety laws and regulations that apply to our workplace and our Company's policies – because we all deserve to feel safe at work.

## How We Empower Integrity:

- Never engage in violent, threatening, or intimidating behavior – and immediately report such improper behavior by anyone around you.
- Do not come to work – or conduct business on behalf of the Company – if you are impaired by any substance, including alcohol or drugs.
- If you are at an event, conference, or social function where alcohol is permitted, act responsibly and never in a way that could put your safety or others at risk.
- Speak up if you notice any unsafe working conditions or any suspicious activity that could be dangerous to you or anyone else.



## Executing Integrity: Alcohol at Company Events

Alcohol, illegal drugs, intoxicants, or controlled substances may impair your ability to work safely and efficiently. We maintain a drug and alcohol-free workplace and prohibit the use of these substances to the extent that they affect, or have the potential to affect, our workplace.

However, there may be times where Palo Alto Networks may provide or permit alcoholic beverages at work-related events. In these cases, remember to:

- Drink responsibly and in moderation.
- Limit your own consumption and always remain responsible and professional.
- Understand that visible intoxication at a Company event is not acceptable.
- Be of lawful drinking age.
- Obey applicable vehicle laws and never drive under the influence of alcohol or if impaired by drugs.

# Environment, Health, and Safety (EHS) (continued)

## EHS Principles

The following are essential elements of the EHS principles to maintaining a safe, healthy, and environmentally responsible workplace:



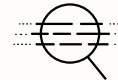
**Commitment to Safety:** We prioritize the health and safety of our employees, contractors, and visitors. Our goal is to foster a culture of safety where incidents are minimized through continuous improvement and proactive risk management is integral to all operations.



**Employee Training and Engagement:** EHS education and training is required for targeted employees. We encourage active participation in safety programs and initiatives, ensuring everyone understands their role in maintaining a safe workplace.



**Regulatory Compliance:** We comply with all relevant local, national, and international EHS laws, regulations, and standards. Continuous monitoring and adaptation to regulatory changes ensure we remain compliant and ahead of industry requirements.



**Incident Reporting and Investigation:** We maintain a transparent incident reporting system where employees are encouraged to report any EHS concerns without fear of retaliation. All incidents are thoroughly investigated to identify root causes and implement corrective actions. Reporting systems are:



**Risk Management:** We proactively identify, assess, and mitigate risks to prevent accidents and incidents. This includes safety audits, hazard assessments, and implementing robust safety protocols.

- Email: [ehshelp@paloaltonetworks.com](mailto:ehshelp@paloaltonetworks.com)
- Phone at +1-800-669-4000
- Safety and Security Incident Report Ticket



**Environmental Stewardship:** We are committed to minimizing our environmental impact through sustainable practices. This involves reducing waste, conserving energy, and promoting eco-friendly initiatives throughout our operations.



**Accountability and Leadership:** Leadership at all levels is accountable for EHS performance. Managers and supervisors are responsible for enforcing safety standards and leading by example to promote a culture of safety and responsibility.



# Environment, Health, and Safety (EHS) (continued)



## Look Out For... Unsafe Working Conditions

While we never expect violence to happen at our Company, we must be prepared to respond to safety concerns if they arise. We want to keep everyone at Palo Alto Networks safe, and we're counting on you to report the following health and safety issues:

- Workplace injuries and illnesses
- Unsafe working conditions and concerns
- Accidents or near misses that don't involve injuries
- Concerns of suspicious activity or workplace violence



### RELATED RESOURCES:

[Palo Alto Networks  
Employee Handbooks](#)

[Palo Alto Networks  
Workplace Violence Prevention  
and Intervention Program  
Guidelines](#)



## Secured by Our Values

A safe and healthy workplace makes our Company stronger, and protecting one another is part of everyone's responsibility. We expect our business partners, vendors, and suppliers to provide and maintain a safe work environment and integrate sound health and safety management practices into their businesses. We're counting on you to raise concerns if you ever see or experience behavior that makes you feel unsafe at work, from a coworker or any other individual.



# Books and Records

Our shareholders, customers, and the public depend on us to provide accurate financial information and to keep and maintain accurate and complete books and records so that they can make informed decisions. We must always be transparent and present information about our Company – including our financial statements – completely, accurately, timely, and in accordance with the law in reports and documents that the Company files with government agencies or releases to the general public. We have controls and procedures in place to assist us in meeting our financial reporting requirements, including timely notifying senior management of material information, and we take compliance with these requirements very seriously.

We never accept falsification of Company documents, inaccurate submissions of expenses, undocumented side agreements, or maintenance of any off-book accounts. We create business records as part of our daily work, and we are all responsible for managing our business records in accordance with our Company policies and the laws and regulations applicable to our business. All business records, whether revenue forecasts, business agreements, or simple requests for reimbursement of travel expenses, must be accurate and complete.

## How We Empower Integrity:

- Report all transactions, payments, and expenses in a timely, honest, accurate, and consistent manner.
- Never create – or ask someone else to create – misleading or false entries in any financial record, or to bypass an internal control.
- Be cooperative and transparent with internal and external auditors, members of the Legal Department, managers, and your peers.
- Follow appropriate accounting principles and other accounting standards when preparing financial statements or information that may support such statements or disclosures.
- Report any errors or concerns about financial entries or inaccurate or false records as soon as possible.

# Books and Records (continued)



## Look Out For... Fraud

Fraud happens when someone tries to misstate or conceal information to personally benefit from or attain an unjust benefit for someone. Fraud is never allowed – even if someone thinks it might help the Company. Fraud can show up in many ways – here are a few examples to keep an eye out for:

- Accounting fraud (for example, making a personal purchase with Company funds, or making fake accounting entries to conceal diverted funds)
- Payroll schemes (for example, inaccurately logging or reporting attendance or falsifying information about responsibilities, lying on a timesheet, or unauthorized pay raises)
- Vendor fraud (for example, kickbacks paid in exchange for an unfair or improper procurement advantage)
- Expense padding (for example, submitting inaccurate claims for fake expense claims)

We hope that fraud will never happen at Palo Alto Networks, but we need to be able to recognize fraud and help stop it if it does occur. If you have concerns about fraudulent financial entries, omissions, or something about a transaction or expense report that just doesn't seem right, report it to the Global Ethics Team right away.



## Secured by Our Values

Accuracy of our books and records and transparency in our financial reporting builds trust, carries over to our overall reputation for integrity, and underpins our business success. As a leading cybersecurity partner of choice, our reputation is everything. It shows the world that they can put their trust in us – which is vital to the growth of our business.



### RELATED RESOURCES:

[Global Expense Authorization Policy](#)

[Travel and Expense Policy](#)

[Corporate Purchasing Card Policy](#)

# Anti-Bribery & Corruption

There is no place for bribery and corruption at Palo Alto Networks – anywhere or anytime – whether we are working with government officials or corporate business partners. Palo Alto Networks is steadfast in its commitment to comply with all applicable global anti-corruption laws, and we expect everyone who works on behalf of our Company (including third parties) to share our commitment to conducting business ethically and with integrity. Palo Alto Networks likewise prohibits facilitation payments, even when lawful under local law.

## How We Empower Integrity:

- Never give, offer, or accept anything of value in an attempt to improperly influence a favorable business decision or government action.
- Never indirectly do anything that is directly prohibited by this Code.
- Be sure to accurately, truthfully, and timely document all payments and transactions – and never attempt to hide or conceal a payment.
- Keep in mind that our Company can be held accountable for the actions of third parties who work on our behalf – so oversee third parties carefully and immediately escalate any red flags of corruption to the Global Ethics Team.
- Know how to identify or get help identifying government officials and public sector entities and be sure to comply with all applicable requirements relating to government business and interactions.



## Look Out For... Bribes and Kickbacks

A **bribe** is offering, soliciting, or giving directly or indirectly (via a third party) anything of value to improperly influence or induce an action or omission in order to obtain or retain business or secure an improper benefit.

Of course, while most bribes are in the form of money – anything of value can come in many forms, including:

- Providing extravagant gifts, hospitality, or other business courtesies
- Offers to make charitable donations or sponsorships
- Political contributions, if given to influence action
- Job or internship offers

A **kickback** is when a reward is offered for a favor. Like bribes, kickbacks don't have to involve cash. Kickbacks can include things like gifts, favors, referrals, or other incentives that may be important to the other party. Simply put, we never offer, solicit, give, or accept kickbacks.

# Anti-Bribery & Corruption (continued)

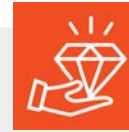


## Look Out For... Bribes and Kickbacks continued

While anti-corruption laws apply broadly, they are especially strict about offering or giving anything improper to a government official. The term “government official” can include a wide range of people beyond elected officials or those with government functions, including:

- Any employee, director, or officer of a foreign or domestic government or any department, agency, or instrumentality of a government, including members of the military and law enforcement
- A state-owned or controlled entity, including, in many countries, telecom, energy, banking, health care, media, utilities, and educational institution employees
- Public international organizations, such as the United Nations, the International Monetary Fund, or the World Bank
- Any person acting in an official capacity for or on behalf of such governmental bodies or public organizations, including entities hired to review and accept bids for a government agency
- Foreign or domestic political parties, candidates for political office, and members of royal families
- A Politically Exposed Person

Even the spouses, family members, and close friends of the examples above can be considered “government officials” when it comes to anti-bribery laws.



## Secured by Our Values

At Palo Alto Networks, we stand against bribery and corruption, and we expect everyone who works on our behalf to do the same. We do not compromise our commitment to open, transparent, and lawful business, and we take pride in our integrity and doing our work the right way – every time.



### RELATED RESOURCES:

[Global Anti-Corruption Policy](#)

[Business Courtesies Policy](#)

[Commercial Sector Courtesies Guide](#)

[Public Sector Guidebook](#)

[Public Sector Courtesies Guide](#)

# Business Courtesies

Building goodwill and fostering positive business relationships are key parts of our Company's success and sometimes involve an appropriate exchange of business courtesies. We must always use good judgment and common sense when giving, offering, accepting, or exchanging business courtesies. There may be a time and place for giving and receiving certain gifts and hospitality – but these exchanges must never influence our ability to make impartial decisions.



## Ask Yourself...

When evaluating whether a business courtesy aligns with this Code and our policies, ask yourself:

- Is there a legitimate business purpose behind this exchange?
- Will this gift or invitation seem improper, overly lavish, or in poor taste?
- Does the recipient's policy allow them to accept this courtesy?
- Is this a cash gift or a cash equivalent gift card (such as Visa or AMEX)?
- Does this exchange reflect poorly on Palo Alto Networks?

## How We Empower Integrity:

- Never offer or give business courtesies to gain an unfair business advantage or favorable treatment.
- Remember, exchanges of business courtesies should be infrequent and appropriate.
- Always obtain pre-approval when inviting spouses, significant others, friends, or any other guests of government officials or when exceeding the threshold values in our Business Courtesies Policy.
- Don't offer, give, solicit, or accept business courtesies that create an actual or perceived conflict of interest, such as offers during active late stages of a request for proposal (RFP) process or during or immediately preceding a recipient closing non-routine business.
- Be aware of specific rules that apply when working with government officials.
- Don't give or accept cash or cash equivalents (such as cash gift cards).
- Understand that all business courtesies must comply with our policies and the law – meaning they should never improperly influence objective business decisions.
- Do not exchange any gifts or hospitality that could be considered illegal or inappropriate, or that could reflect negatively on Palo Alto Networks.

# Business Courtesies (continued)



## Secured by Our Values

Our integrity is not for sale. We show the world that we live up to our values by establishing and nurturing business relationships on the basis of trust.

If you have any questions about whether it is appropriate to give or receive a business courtesy, need help with identifying public sector recipients, require pre-approval, or want to ensure an exchange of courtesies does not violate any policies, laws, or regulations, contact the Global Ethics Team for guidance.



### RELATED RESOURCES:

[Anti-Corruption Policy](#)

[Business Courtesies Policy](#)

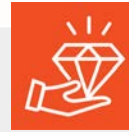


# Public Sector Compliance

Palo Alto Networks is a proud provider of products and services to governments around the world. Government procurement laws, rules, and regulations are often complex and can vary widely between jurisdictions. When we are involved in supporting and facilitating public sector business, we must understand and comply with applicable laws, regulations, and government contract requirements. We always take every reasonable measure to protect all information against unauthorized disclosure.

## How We Empower Integrity:

- Understand that our work in the public sector requires us to always make accurate statements, certifications, and representations about our business.
- Confirm pricing, proposals, performance, and information submitted in support of a government contract are current, accurate, complete, and free from false or misleading statements.
- Never improperly use nonpublic information relating to public sector transactions, including competitor information such as sealed bids, cost and pricing, or other proprietary information.
- Avoid organizational conflicts of interest, always properly and timely disclosing any relevant conflicts of interest.
- Be aware of limitations in recruiting and hiring. Do not discuss employment or business opportunities that personally benefit a public sector employee involved in business with Palo Alto Networks.



## Secured by Our Values

When we work with honesty and integrity, we can earn and maintain the trust of our government partners.



# Trade Compliance

At Palo Alto Networks, we're committed to complying with all applicable trade regulations, including, among others, embargoes, export controls, import controls, sanctions, and boycott laws. Global trade regulations often go beyond mere sale and resale of products and encompass shipping, support, testing, carrying test prototypes across borders, hiring nationals of certain countries to work on certain intellectual property, and providing access to software or code, even temporarily.

Many locations where we do business – particularly the United States – have strict trade controls against countries which limit where and with whom we can do business. We respect the rights of governments to regulate how goods, information, and services flow across national borders and expect the same from our business partners, customers, vendors, and suppliers. Non-compliance can lead to serious consequences, including civil and criminal charges and penalties, suspension of trade licenses and export privileges, and harm to our reputation.

## How We Empower Integrity:

- Know the trade controls applicable to your job and understand how to comply with them.
- Never conduct business with parties that are subject to applicable sanctions or trade restrictions.
- Direct any questions you have about trade laws and regulations to our Trade Compliance Team ([trade@paloaltonetworks.com](mailto:trade@paloaltonetworks.com)).
- Immediately escalate any concerns about potential violations of applicable laws and regulations by Company staff, business partners, customers, vendors, or suppliers to the Global Ethics Team ([ethics@paloaltonetworks.com](mailto:ethics@paloaltonetworks.com)).



## Look Out For... Export Controls

Trade compliance can be a tricky topic. An export encompasses the physical (our hardware) and non-physical (our software, source code, and technology). In general, an export is a shipment from the United States to a foreign country; a shipment from one foreign country to another foreign country; and an in-country transfer.

Sometimes, it may be difficult to recognize what could be considered an export. For example, in some cases, an oral presentation containing technical data made to foreign nationals in the United States may be considered an export subject to control. Be sure to contact our Trade Compliance Team for guidance anytime you are uncertain or have a concern.

# Trade Compliance (continued)



## Secured by Our Values

Conducting our business with integrity means that we understand the requirements for where and how we can operate. It's crucial that we uphold our commitment to operating in compliance with all applicable trade laws and regulations and take reasonable steps to ensure our customers, business partners, vendors, and suppliers do the same and help uphold our values.

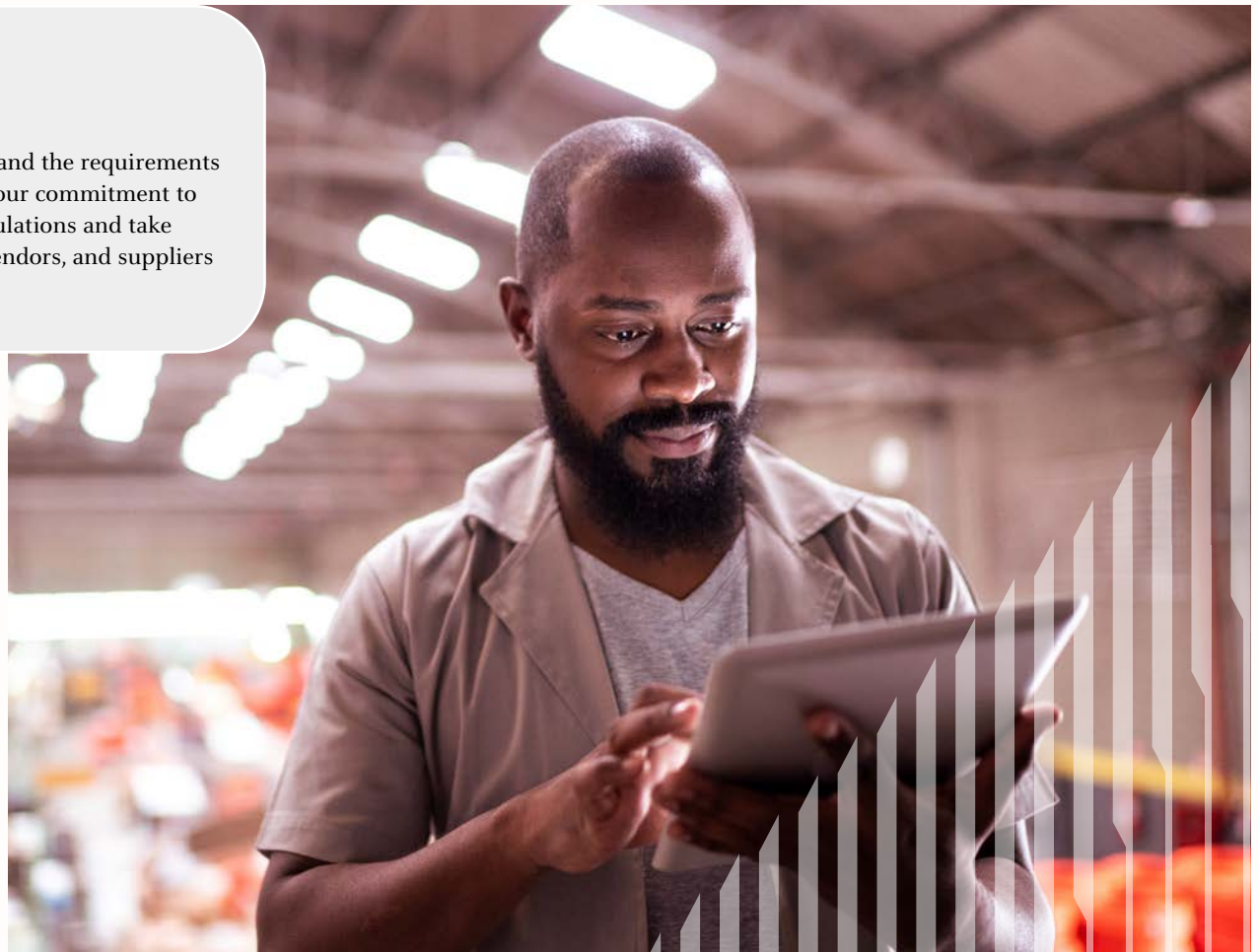


### RELATED RESOURCES:

[Trade Compliance & Logistics](#)

[CEO Export Policy Statement](#)

[Trade Compliance Letter to Partners](#)



# Insider Trading

Insider trading occurs when someone who has material nonpublic or inside information about our Company or other companies buys or sells securities or enables others to do so, benefitting from inside information they have that the market does not.

Not only is insider trading unfair – it is also illegal. We must follow all relevant laws and regulations prohibiting insider trading and recognize that it is unlawful to buy or sell securities based on inside information. It is also against the law and our Company policy to “tip” or share information with anyone who may trade on that information.

## How We Empower Integrity:

- Never buy or sell securities based on material nonpublic information. (This includes information about Palo Alto Networks and any third parties with whom we do business.)
- Know how to recognize material nonpublic information and do not share it with others outside the Company or with Company employees not authorized to receive this information.
- Understand that “tipping,” or providing material nonpublic information to others to facilitate trading securities, is illegal.



## Terms to Know: What is material nonpublic information?

Material nonpublic information is information that, if made public, could affect a company’s stock price. Examples of material nonpublic information include, but are not limited to:

- Unpublished financial data such as earnings
- Changes in executive management
- Marketing strategies or product developments
- Mergers, acquisitions, tender offers, or entry into joint ventures
- Potential mergers, acquisitions, or divestitures
- Gain or loss of a key client

# Insider Trading (continued)



## Secured by Our Values

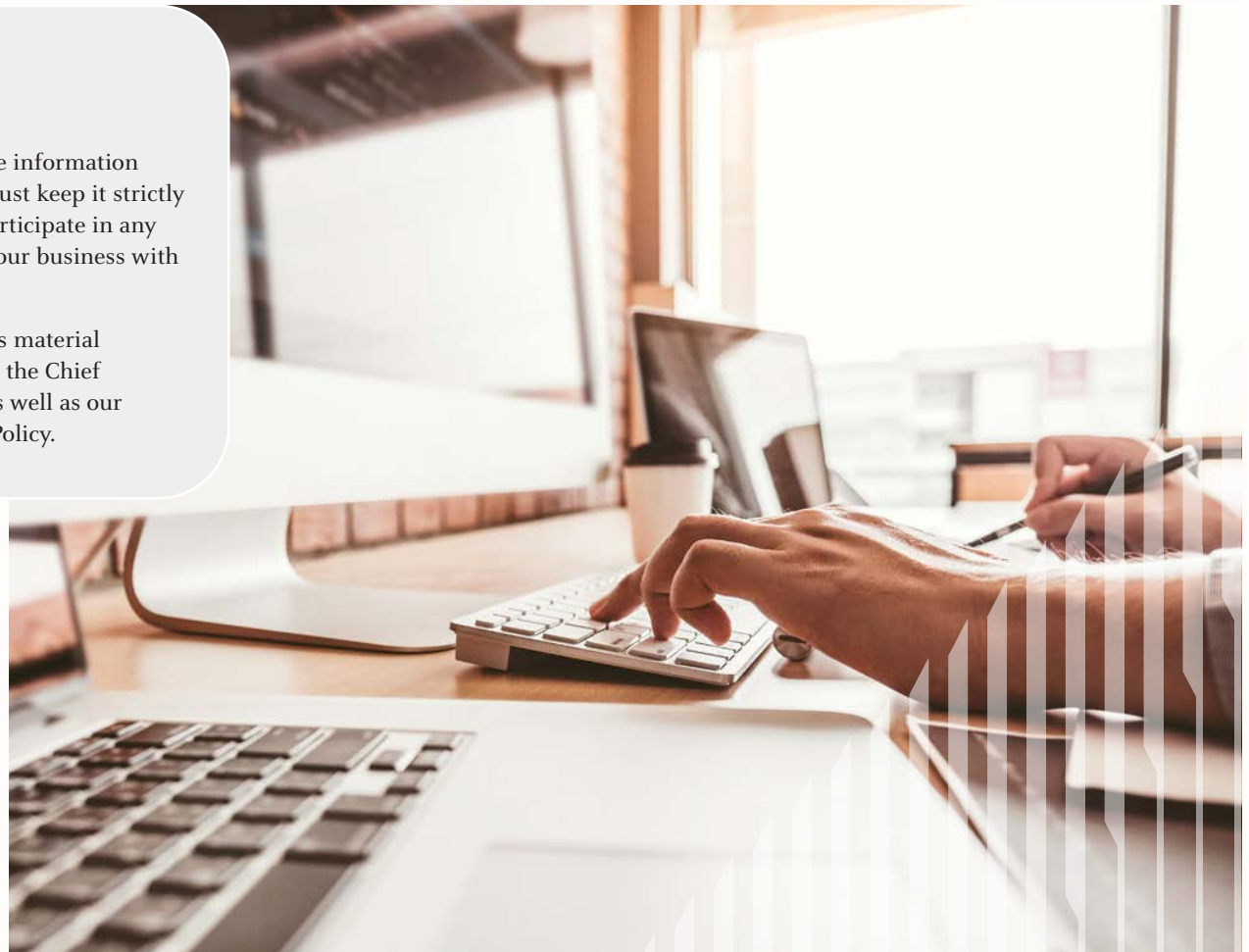
We inspire trust, and we live up to it. You may encounter inside information through your work at Palo Alto Networks, and if you do, you must keep it strictly confidential and avoid participating in or enabling others to participate in any trading based on material nonpublic information. Conducting our business with integrity means keeping our inside information, inside.

If you have any questions about whether something qualifies as material nonpublic information, please contact the Legal Department or the Chief Compliance Officer. Further details regarding insider trading as well as our trading blackout periods are contained in our Insider Trading Policy.



### RELATED RESOURCES:

[Insider Trading Policy](#)

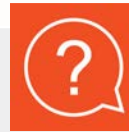


# Conflicts of Interest

Conflicts of interest can happen when our own personal interests conflict with, or even appear to conflict with, our responsibility to act in the best interest of Palo Alto Networks. Conflicts of interest can prevent us from making objective business decisions, which can keep us from doing our jobs objectively. We need to avoid conflicts of interest – and timely and appropriately disclose and manage conflicts when they do arise – so that we can perform our jobs effectively and maintain our reputation of integrity.

## How We Empower Integrity:

- Understand how to recognize a personal conflict of interest that could compromise your responsibilities to Palo Alto Networks or impact your ability to perform your work impartially.
- Never use your position at Palo Alto Networks to attempt to obtain improper personal benefits.
- Don't accept gifts or hospitality that may influence, or appear to influence, business decisions.
- Keep in mind that sometimes the interests of immediate family members or individuals with whom you have close personal relationships can also create conflicts of interest.
- Disclose any potential conflicts of interest to the Global Ethics Team as soon as possible.



## Ask Yourself...

Evaluating potential conflicts of interest is not always easy. When faced with a potential conflict, ask yourself:

- Could this relationship or activity compromise – or even appear to compromise – my ability to work fairly and objectively at Palo Alto Networks?
- Could this relationship or activity compromise – or even appear to compromise – my job responsibilities?
- Could this activity harm Palo Alto Networks or customer relationships, or result in the use or disclosure of confidential and/or proprietary information?
- Could this activity or relationship create the appearance of impropriety or misuse of my position for personal gain or benefit (whether to me, a close family member, or another organization with which I'm personally or financially connected)?

If you answered “yes” to any of these questions, the activity or relationship may present a potential conflict that must be disclosed to the Global Ethics Team.

# Conflicts of Interest (continued)



## Executing Integrity: Examples of Conflicts of Interest

While it is impossible to identify every potential conflict of interest, here are some examples of different types of personal relationships and activities that can create potential conflicts of interest and must be disclosed:

- **Outside Employment:** Participating in outside work or activities must not interfere with your responsibility to work fairly and effectively for Palo Alto Networks.
- **Service on Outside Boards and Committees:** If you plan to sit on the board of directors for an outside organization, you must receive proper approval from our Company first.
- **Close Relationships:** You may not be in a direct supervisory relationship with, or take part in the hiring or selection process involving, a relative, romantic partner, or close friend. Directing business to or engaging with entities that are owned or managed by related parties or close friends will also create a conflict of interest.
- **Financial Investments:** You may not hold an undisclosed financial investment in an entity that is a competitor, supplier, customer, or business partner of Palo Alto Networks if such an investment could be an actual or perceived conflict of interest.
- **Corporate Opportunities:** Do not take, or direct a third party to take, advantage of opportunities that could benefit Palo Alto Networks if you become aware of them through your position here, or through your use of our Company's property or information. Further, do not engage in activities that compete with the Company directly or indirectly during your employment with the Company, unless otherwise provided in a written agreement with the Company.
- **Personal Political Activities, Public Office, and Political Appointments:** You may engage in personal political activities as long as it is separate from your role at the Company, and you do not use Company time, facilities, and resources. If you are considering running for public office or a political appointment in any federal, state, or local government, you must disclose and request written approval at least 30 days before declaring candidacy or accepting an offer for a political appointment.

# Conflicts of Interest (continued)



## Secured by Our Values

When we're transparent in disclosing conflicts and potential conflicts, we live out our value of Integrity. Disclosing conflicts of interest does not mean we can never pursue opportunities outside of our work at Palo Alto Networks. Although we always want to avoid actual and potential conflicts of interest, oftentimes, we can work together to evaluate and resolve potential conflicts.

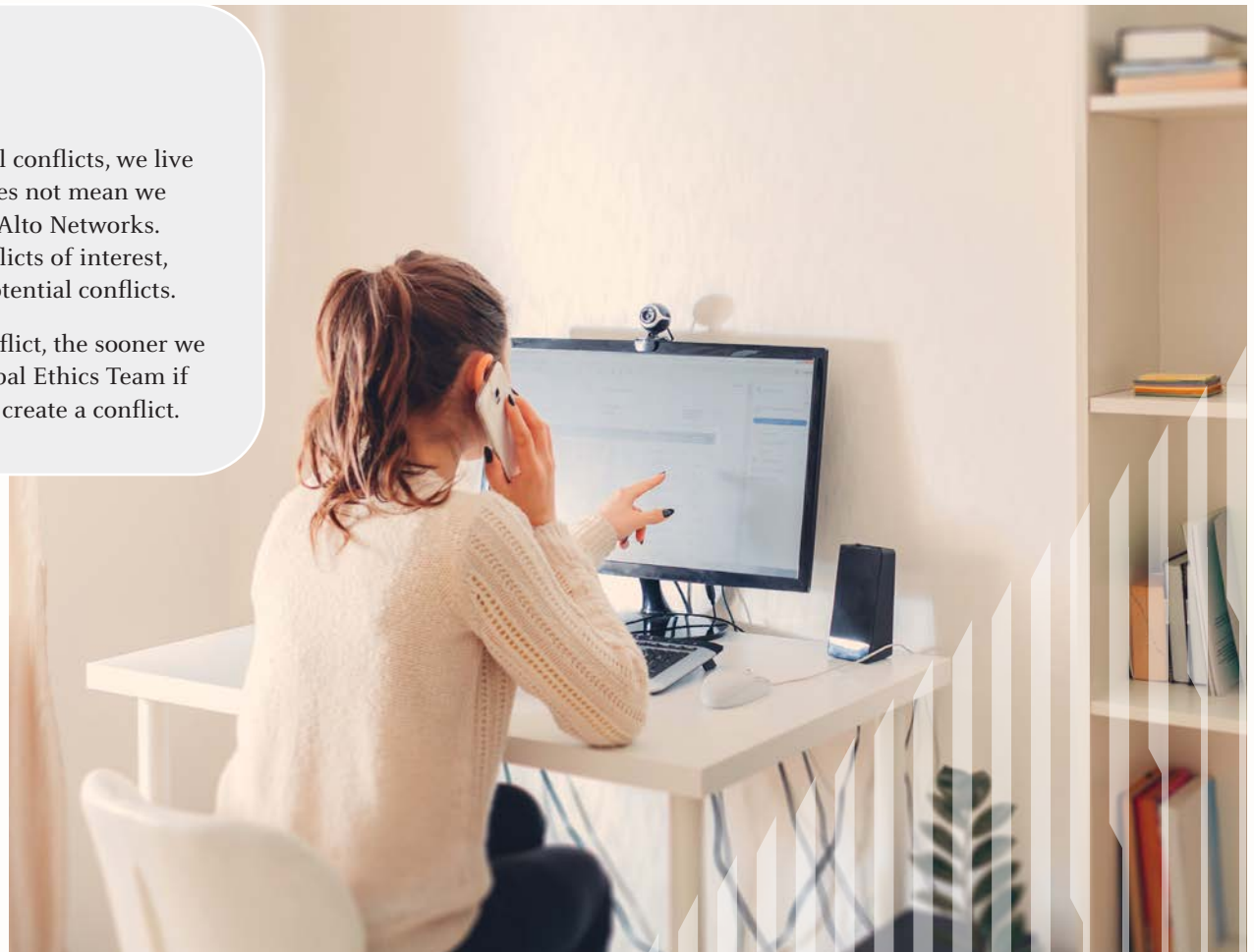
The sooner we are made aware of a conflict or potential conflict, the sooner we can work together to resolve it. Seek guidance from the Global Ethics Team if you have questions about if a relationship or interest might create a conflict.



### RELATED RESOURCES:

[Conflicts of Interest Policy](#)

[Conflict of Interest Disclosure Form](#)



# Safeguarding Confidential and Personal Information

In the course of our work, we will have access to confidential Palo Alto Networks information, and we may even have access to the confidential information of our business partners, customers, vendors, suppliers, or other third parties with whom we work. We are all responsible for recognizing and safeguarding confidential information, which includes protecting it from unauthorized use or disclosure.

We may have access to personal data. It's important to always take the necessary steps to protect personal information and never use it unlawfully or inappropriately. Each of us is responsible for safeguarding this information by strictly adhering to data protection and privacy laws. Additionally, all employees must comply with the Palo Alto Networks Global Privacy Policy.

## How We Empower Integrity:

- Understand how to identify confidential and personal information.
- Treat all confidential and personal information with care and follow all Palo Alto Networks information system policies and procedures.
- Only discuss and share confidential information inside of Palo Alto Networks with those who have a need to know it. This is not intended to interfere with, restrain, or prevent any employee communications regarding wages, hours, or other terms and conditions of employment.
- Never share confidential information with anyone outside of Palo Alto Networks without a legitimate business justification and appropriate internal approvals and non-disclosure agreements.
- Be careful not to discuss confidential information in public places.
- Collect and use private information only for the reason for which it was originally collected.
- Do not record (audio or visual) meetings or communications without the knowledge and consent of all participants, even in locations where secret recording is not strictly prohibited by law or Company policy.



## Terms to Know

### What is confidential information?

Confidential information is information about Palo Alto Networks or one of our business partners that has not yet been made available to the public. Confidential information includes nonpublic information that helps us keep our competitive advantage, including:

- Strategic plans about Palo Alto Networks
- Marketing plans
- Senior management changes
- Budget and operating information

### What is personal information?

Personal information includes any information that alone, or in combination with other information, can be used to identify an individual. Personal information does not have to identify someone by name – a person's address, birthday, email address, phone number, or even photograph can be considered personal information.

If there is a need to transmit confidential or personal information, you should confirm the need to know with the data owner and that the appropriate data protections are in place before transmitting. The handling of this information must be in line with our Company Information Classification and Handling Standard.

If you are looking for more information on how to handle Company information, consult the Global Privacy Policy.



# Safeguarding Confidential and Personal Information (continued)



## Secured by Our Values

We show respect to our customers, partners, employees, and shareholders by keeping confidential and personal information secure. By safeguarding the confidential and sensitive information that relates to our Company, we protect our competitive advantage and maintain our reputation as a trustworthy partner.



### RELATED RESOURCES:

[Acceptable Use Policy](#)

[Privacy Notices](#)

[Information and Classification Standards](#)

[Privacy Statement](#)



# Using Our Technology in the Workplace

We depend on technology in our workplace to help us perform our jobs effectively – so it’s critical that we use these tools in accordance with our Company policies. We all must use technology safely and responsibly, including the use of our physical Company equipment (such as our computers, phones, or other electronic devices), as well as the use of our Company software.

## How We Empower Integrity:

- Use Company equipment and systems appropriately and primarily for business purposes.
- Understand that Palo Alto Networks owns our systems and has the right to monitor and may access any information that we send, create, or maintain on those systems.
- Never use our IT network, systems, or devices to send or access anything inappropriate or illegal.
- Remember that Company equipment is the property of Palo Alto Networks. (This means that all equipment must be returned when your relationship with the Company ends.)
- Only install software that has been licensed and approved by Palo Alto Networks.
- Be aware of phishing or other attempts to gain unauthorized access to our systems and data.
- Follow IT security guidelines, including but not limited to the creation, format, and scheduled changes of passwords.



## Executing Integrity: How We Keep Our Information Systems Safe

Our information systems keep our Company running smoothly, and we must work together to protect them. There are many different things you can do to keep our information systems safe, including:

- Protecting devices by updating your passwords in line with our Company Password Standard
- Using password or personal identity number protection on all mobile devices (such as laptop computers or phones) that are vulnerable to theft
- Locking computers when not in use to avoid unauthorized access
- Never downloading unauthorized files or software onto Palo Alto Networks’ systems or devices
- Never opening any links or attachments that could be phishing or attempting to gain unauthorized access to our systems and data
- Understanding that Palo Alto Networks owns and monitors its systems, and that the Company maintains the right to monitor systems and data to protect them
- Reporting any possible security breach or loss of equipment to the IT Department as soon as possible
- Notifying the Information Security and Global Ethics teams if you notice trends in your work environment which indicate a potential or actual insider risk or threat

# Using Our Technology in the Workplace (continued)



## Secured by Our Values

When we work together, we win together. We value Collaboration at Palo Alto Networks, and each one of us plays a role in protecting our Company assets and data by using our Company technology responsibly.

Please contact the following with questions, concerns, and reports about technology in the workplace:

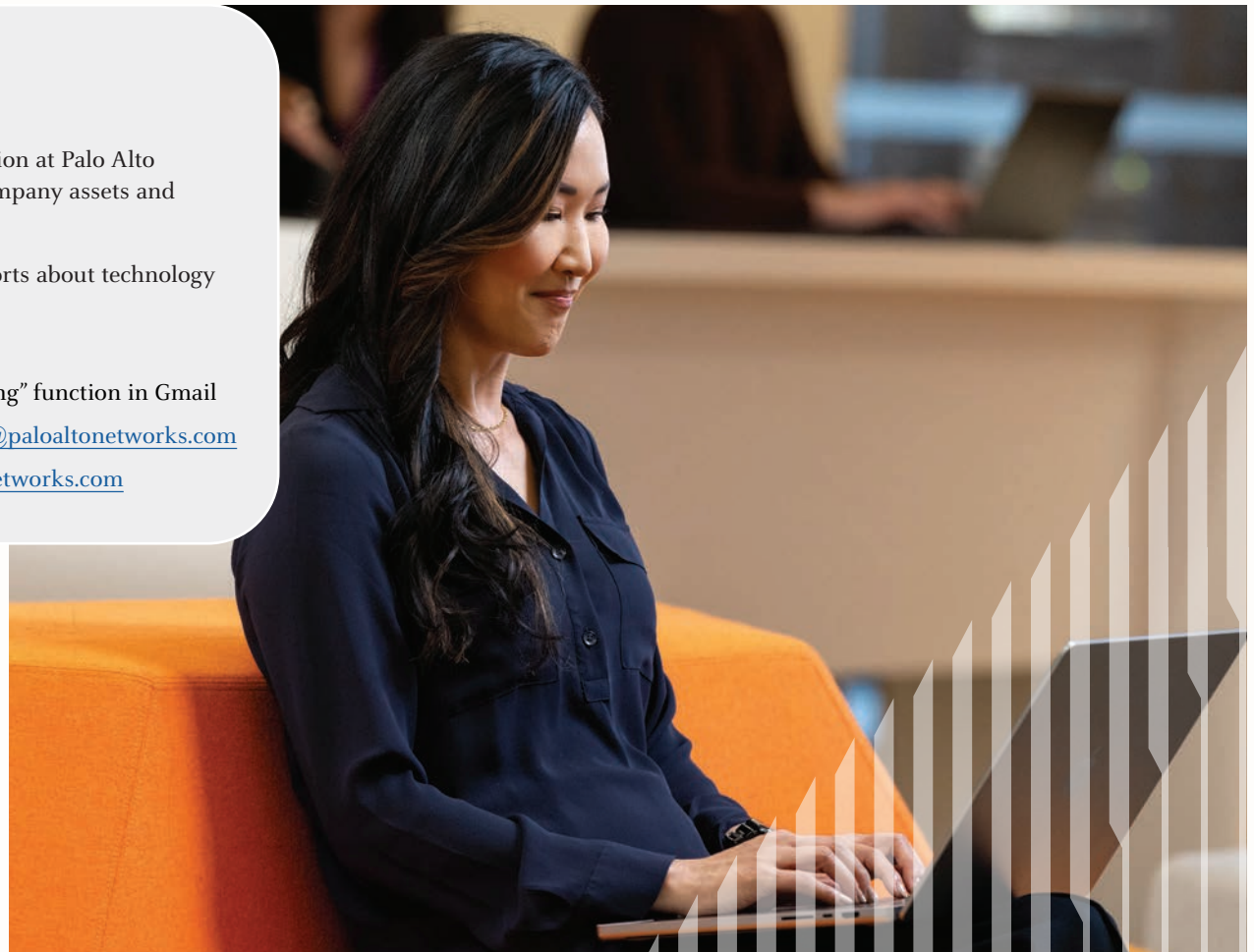
- **For General Inquires:** [infosec@paloaltonetworks.com](mailto:infosec@paloaltonetworks.com)
- **For suspected phishing emails:** use the “Report phishing” function in Gmail
- **For security incidents (imminent or occurred):** [csirt@paloaltonetworks.com](mailto:csirt@paloaltonetworks.com)
- **For Company product vulnerability:** [psirt@paloaltonetworks.com](mailto:psirt@paloaltonetworks.com)



### RELATED RESOURCES:

[Acceptable Use Policy](#)

[Password Standard](#)



# Protection and Proper Use of Company Assets

At Palo Alto Networks, we all benefit when we use our Company assets efficiently. There are many different kinds of assets that belong to Palo Alto Networks, including our financial, physical, and intellectual property assets. Theft, carelessness, and waste all have a direct effect on the success and profitability of our business, and we are all responsible for protecting and using our assets with a heightened duty of care than we apply to our own personal assets.

## How We Empower Integrity:

- Use Company assets for only business purposes, including email. While limited personal use of the internet is permissible, ensure it does not interfere with your job responsibilities.
- Protect any devices that contain data or information about our Company or that connect to our systems.
- Safeguard our intellectual property and report any concerns about unethical or unauthorized use of our intellectual property, other assets, or improper use of intellectual property of others.
- Always avoid waste and use good judgment when incurring expenses on behalf of Palo Alto Networks.
- Follow our Company procurement procedures, and only engage in transactions and expenditures with proper authorization.



## Terms to Know

### What is a Company asset?

Our assets include anything that belongs to Palo Alto Networks, including:

- Our financial assets, including unpublished financial data and reports
- Our physical assets, supplies, and other physical property, including our equipment and facilities
- Our intellectual property, including our copyrights, patents, trademarks, and trade secrets
- Our confidential or proprietary information, including our ideas, concepts, inventions, business and marketing plans, engineering and manufacturing ideas, and designs
- Our technology, including our computer equipment and information systems

# Protection and Proper Use of Company Assets (continued)



## Executing Integrity: Protecting Against Cyber Threats

Palo Alto Networks is constantly working to make a world where each day is safer and more secure than the one before by responsibly using our technology. Palo Alto Networks is the world's cybersecurity leader, working diligently to protect our customers against cyber threats. Because we are on the front lines of protecting others, we are also a target of malicious threat actors. Hacking and cybercrime are threats to our Company assets, so it's crucial that we all take every reasonable precaution to keep our systems and tools secure:

- Follow all Company policies and procedures designed to protect our systems from unauthorized access.
- Use strong passwords, and never share your usernames or passwords.
- Be alert to phishing, smishing, whaling, spoofing, and all other cyber scams or other attempts to uncover sensitive personal or other Company information.
- Do not open suspicious links in emails.
- Never install unauthorized software, applications, hardware, or storage devices on your Company devices – including open-source software and third-party applications.
- Do not input any Company information into unapproved third-party AI tools.



## Ask Yourself... Using Artificial Intelligence (AI)

In your role, you may encounter AI tools that might seem like they could assist you in your work – but it's important to consider the potential risks to our Company assets and network before doing so. Before using any AI tool, ensure it adheres to all relevant policies, standards, and required reviews and approvals. All use should adhere to our Principles for Safe and Responsible Development, Deployment, and Use of AI. Ask yourself: Is it -

- **Secure:** Palo Alto Networks uses secure development principles and best practices throughout the design, development, and deployment of AI systems, designed to protect the confidentiality, integrity, and availability of the underlying AI model and its associated data.
- **Safe and Robust:** Palo Alto Networks uses and develops AI systems in a safe manner, with careful consideration of the intended and unintended uses or impacts.
- **Valid and Accurate:** Palo Alto Networks evaluates AI system development and deployments, assessing whether they are fit for purpose and produce accurate responses that track with the model's intended objective.
- **Free of Bias:** Palo Alto Networks implements best practices in its design and use of AI systems and the data used to train or validate performance of AI models, with the objective that they do not produce discriminatory results.
- **Transparent and Explainable:** Palo Alto Networks discloses how AI is incorporated into a particular system, and how the AI contributes to the system's output, in a way that allows users of the system to understand the system's output and use it in the proper context.
- **Protective of Privacy:** Palo Alto Networks designs AI systems using privacy best practices to protect personal information that may be processed or used within a particular AI deployment, and to satisfy applicable regulatory requirements.

# Protection and Proper Use of Company Assets (continued)



## Secured by Our Values

Our financial assets, information assets, and physical assets enable all of us to further Palo Alto Networks' mission and vision. When we use our Company assets responsibly, we each contribute to the collective success of our business.



### RELATED RESOURCES:

[Policy for Responsible Use of Artificial Intelligence](#)

[Acceptable Use Policy](#)

[Information Security Policy](#)

[Information Classification and Handling Standard](#)

[Travel and Expense Policy](#)

[Global Expense Transaction Authorization Policy](#)

[AI Security Standard](#)

[Password Standard](#)



# Careful Communications

Our communications have a direct impact on the way that the world perceives us. We're committed to providing clear and consistent messaging to our shareholders, customers, business partners, vendors, suppliers, and the general public. To make sure that our communications are consistent and accurate, Palo Alto Networks has certain designated individuals who are authorized to speak on the Company's behalf.

## How We Empower Integrity:

- Only speak to the public on behalf of Palo Alto Networks once you obtain proper manager and other approvals and/or reviews in accordance with the External Communications Policy.
- Refer all press inquiries to the Corporate Communications Department, who will make sure that each inquiry is directed to the appropriate resource.



## Executing Integrity: Using Social Media

Social media is a powerful tool that can be used to promote our business and engage with our communities. However, social media can also impact our Company's reputation and expose us to other potential risks. We're all responsible for using common sense and good judgment whenever we post online.

- Be clear that your posts represent your own personal views – not the views of Palo Alto Networks.
- Never post or discuss confidential or proprietary information about our Company or any of the third parties with whom we work.
- Don't prematurely post online about business-related activities (for example, posting a congratulatory message about a strategic partnership on LinkedIn before it has been publicly announced by the Company).

# Careful Communications (continued)



## Secured by Our Values

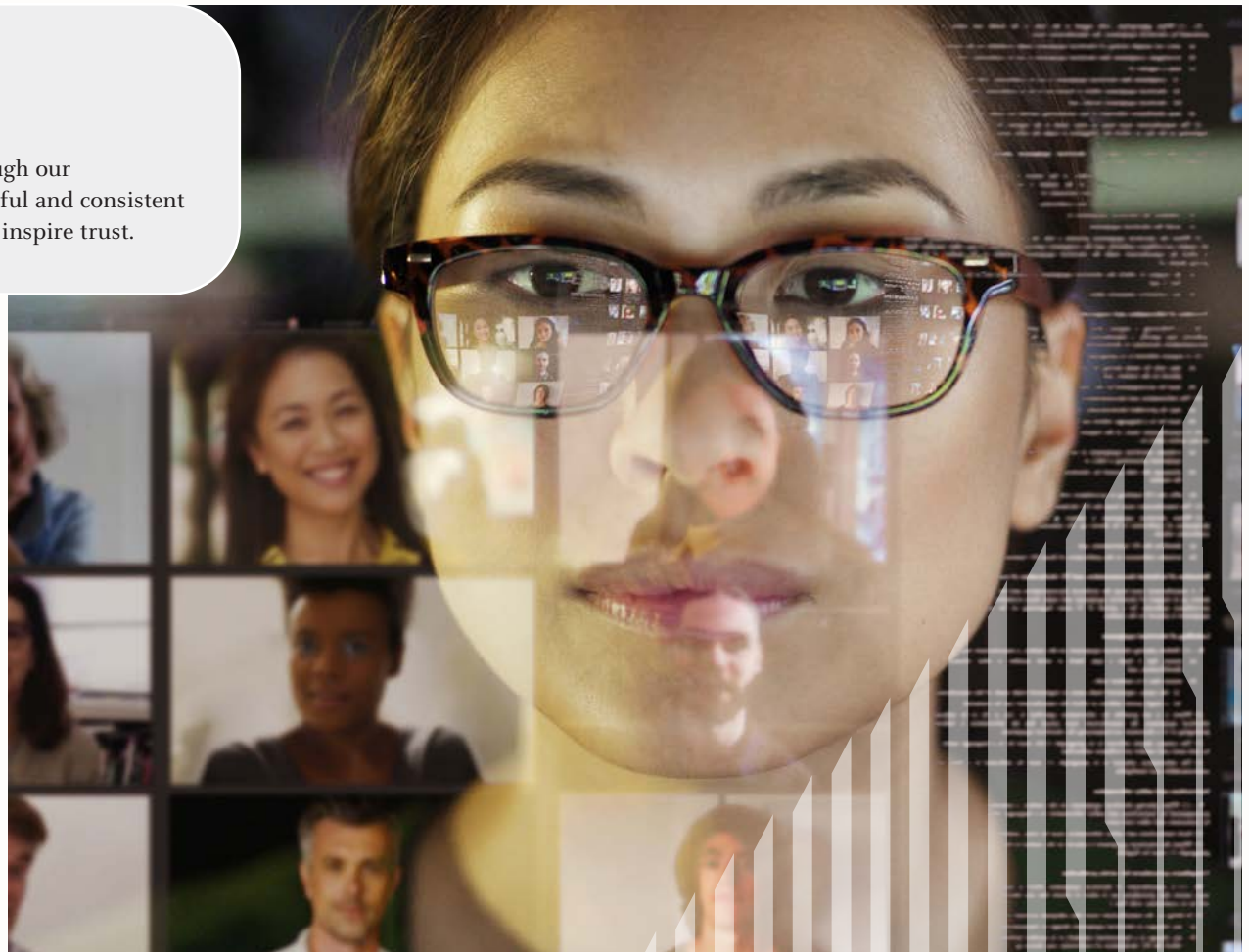
We convey the mission and vision of Palo Alto Networks through our communications to the rest of the world. When we share truthful and consistent information, we establish ourselves as a company that aims to inspire trust.



### RELATED RESOURCES:

[External Communications Policy](#)

[Social Media Policy and Guidelines](#)





# Supplier, Customer, and Other Third-Party Relationships

At Palo Alto Networks, holding ourselves to the highest standards means working with third parties and suppliers that share our same commitment to operating ethically and with integrity and in accordance with our Global Supplier Code of Business Conduct and Ethics. During our procurement process, we carefully select the third parties that we do business with and maintain honesty and objectivity when doing so.

## How We Empower Integrity:

- Work with suppliers and third parties that share our commitment to Palo Alto Networks' mission, vision, and values.
- Understand that we may be responsible for the third parties that work on our behalf.
- Review potential third parties objectively and impartially throughout the procurement process, and comply with all applicable due diligence requirements when onboarding vendors.
- Conduct appropriate due diligence on third parties that interact or could interact with government or government officials on our behalf.



## Terms to Know

### Who is a Third-Party Representative?

A third-party representative is any individual or entity who acts on behalf of Palo Alto Networks, which may include:

- Consultants
- Brokers
- Intermediaries
- Lobbyists
- Contractors
- Distributors
- Resellers
- Joint Venture partners
- Vendors
- Suppliers

# Supplier, Customer, and Other Third-Party Relationships (continued)



## Secured by Our Values

We set the standard for ethical conduct and are responsible for communicating this to everyone who works on behalf of Palo Alto Networks. When our relationships with third parties are built on trust, it allows us to continue our success as a business.



### RELATED RESOURCES:

[Business Partner Code of Conduct](#)

[Global Supplier Code of Business Conduct and Ethics](#)

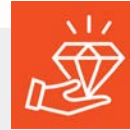


# Antitrust and Fair Competition

At Palo Alto Networks, we know that winning business the right way means playing fair. We compete on our merits alone – and never through unethical or illegal business practices. We respect and comply with global antitrust and competition laws and regulations that promote a fair and free marketplace.

## How We Empower Integrity:

- Don't share or discuss competitively sensitive information with competitors – even informally. (This can include information on pricing, bids, outputs, wages, and proprietary knowledge obtained from previous employment.)
- Never make unfair or dishonest claims about our competitors.
- Do not enter into formal or informal agreements with competitors to restrict competition.
- Never engage in bid rigging, fixing resale prices, or other anticompetitive behavior.
- Never take unfair advantage through manipulation, concealment, misrepresentation, or any other unfair dealing practice.



## Secured by Our Values

We take great pride in working toward making the world a safer place. By avoiding actions that could restrict fair competition and complying with applicable competition laws, we know that our success is backed by integrity.

# Antitrust and Fair Competition (continued)



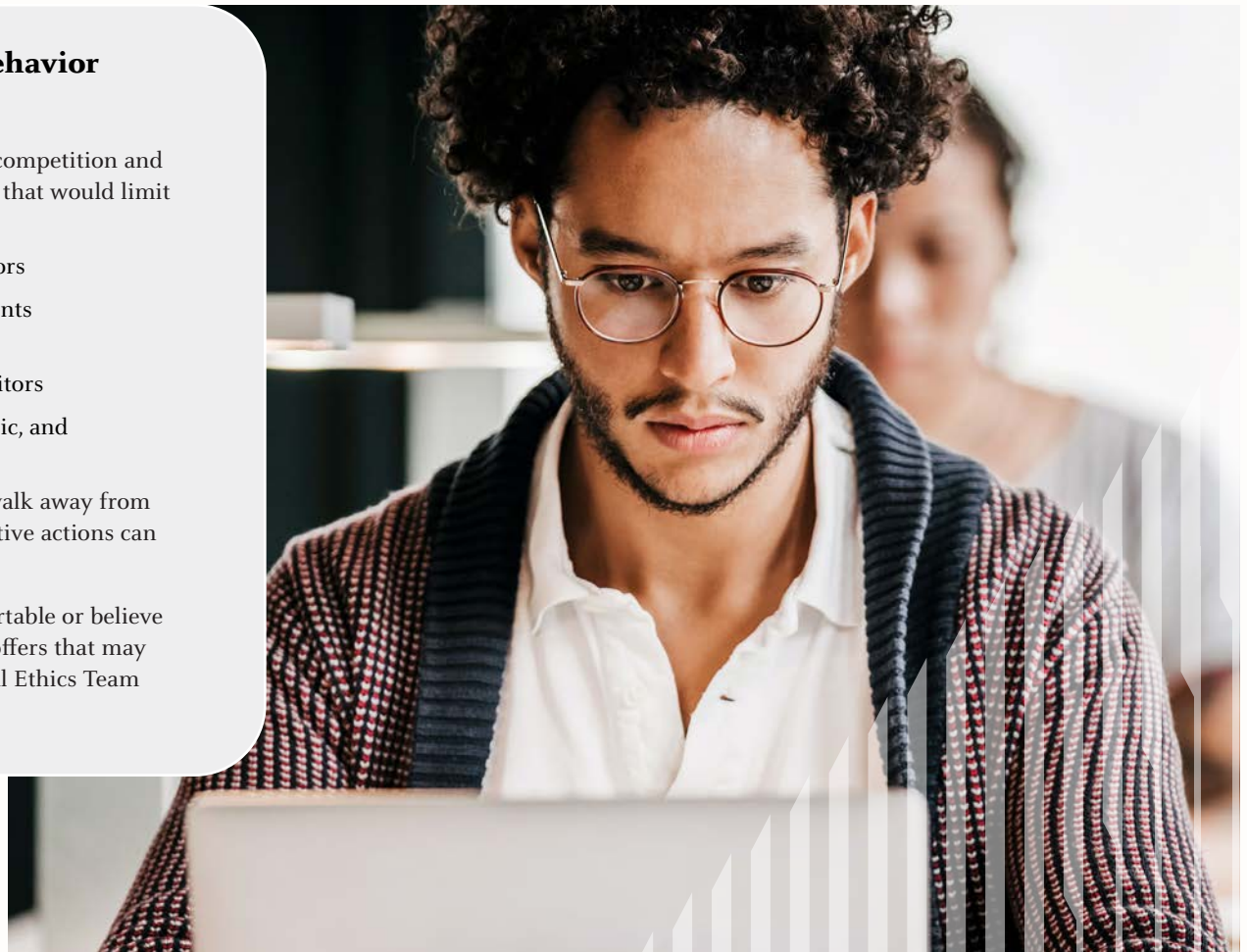
## Look Out For... Anticompetitive Behavior

There's no place for agreements with competitors that restrict competition and harm consumers. Some examples of anticompetitive behaviors that would limit competition include:

- Fixing prices or other terms in agreements with competitors
- Dividing up markets by territory or customers in agreements with competitors
- Coordinating bidding activity in agreements with competitors
- Inappropriate sharing of competitively sensitive, nonpublic, and proprietary information

It's important to recognize anticompetitive behavior – and to walk away from discussions that cross the line. Even unintentional anticompetitive actions can have harmful consequences.

If you find yourself in a situation that makes you feel uncomfortable or believe that a business partner or competitor has made statements or offers that may be anticompetitive or misinterpreted as such, contact the Global Ethics Team right away.



# Money Laundering

We're committed to doing business ethically and with integrity, and we know that the people and companies with whom we work can affect our reputation. We only conduct business with organizations involved in legitimate business activities, with funds derived from legitimate sources. We comply with the anti-money laundering, anti-corruption, and anti-terrorist financing laws and regulations that apply to our business.

## How We Empower Integrity:

- Be alert for any signs of potential money laundering, terrorist financing, or other illegal activities and immediately report them.
- Understand with whom you are doing business and the legitimacy of their business activities and practices.



## Secured by Our Values

Working with legitimate business partners builds trust that carries over to our overall reputation. And our reputation is everything. It shows the world that they can put their trust in us – which is vital to the growth of our business.



## Terms to know

### What is Money Laundering?

Money laundering is the criminal practice of concealing the source of illegal funds. Sometimes, criminals will use legitimate companies to facilitate this illegal activity. Palo Alto Networks is committed to conducting our business only with reputable third parties and engaging only in legitimate business activities. When we follow proper due diligence procedures, we are able to prevent any potential money laundering from happening in our business.

To help detect and prevent any illegal involvement in money laundering, we need to be aware of the warning signs that could signal illegal activity, including:

- Unusually large transactions
- Requests for payments to be made to a country where there is no apparent connection between the country and the third party
- Requests for payments to multiple bank accounts without reasonable explanation
- Lack of transparency in the documentation supporting the transaction

# Environmental Stewardship

We support the communities where we live, work, and operate by making business decisions that always consider the well-being of those around us. We comply with all environmental and labor laws that apply to our business.

## How We Empower Integrity:

- Advance our sustainable operations by accelerating carbon- and waste-free growth through energy efficiency, decarbonization, renewable energy, and meeting science-based targets.
- Create a sustainable value chain by engaging our customers and suppliers to drive to zero carbon, zero waste, 100% renewable energy and 100% circularity in our cybersecurity products.
- Promote our sustainable ecosystem by driving leading public commitments, policy advocacy, and partnerships to elevate our thought leadership position.



## Executing Integrity: Supplier Responsible Mineral Sourcing

We are committed to responsible mineral sourcing by obtaining materials for our products from companies that share our values with regard to human rights, ethics, and social and environmental responsibility. Because our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting, and refining of Conflict Minerals, we expect all suppliers to maintain policies, procedures, and due diligence measures that enable us to achieve this goal.

We expect our suppliers to honor this commitment by complying with our Global Supplier Code of Business Conduct, the Responsible Business Alliance Code of Conduct, and all applicable employment, environmental, health and safety, and ethics practices required by law.



## Secured by Our Values

To achieve our corporate vision of a safe and secure world and protect our digital way of life, we must also do our part to keep the planet and our communities healthy and thriving.

# Human Rights

At Palo Alto Networks, we believe that human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled, and we are committed to respecting these rights. We respect the rights and dignity of all human beings and require that our business partners share this same level of integrity.

## How We Empower Integrity:

- Commit to supporting the human rights of everyone around us.
- Respect fair labor laws, including wage and hour laws and prohibitions against forced, trafficked, or child labor.
- Understand that Palo Alto Networks strictly prohibits the use of forced labor, human trafficking, and child labor in any part of our business or supply chain.



## Secured by Our Values

Palo Alto Networks is committed to protecting the rights and dignity of all people and expects that our suppliers will do the same. We honor this commitment when we work with partners who share this same level of integrity and support for human rights around the world.



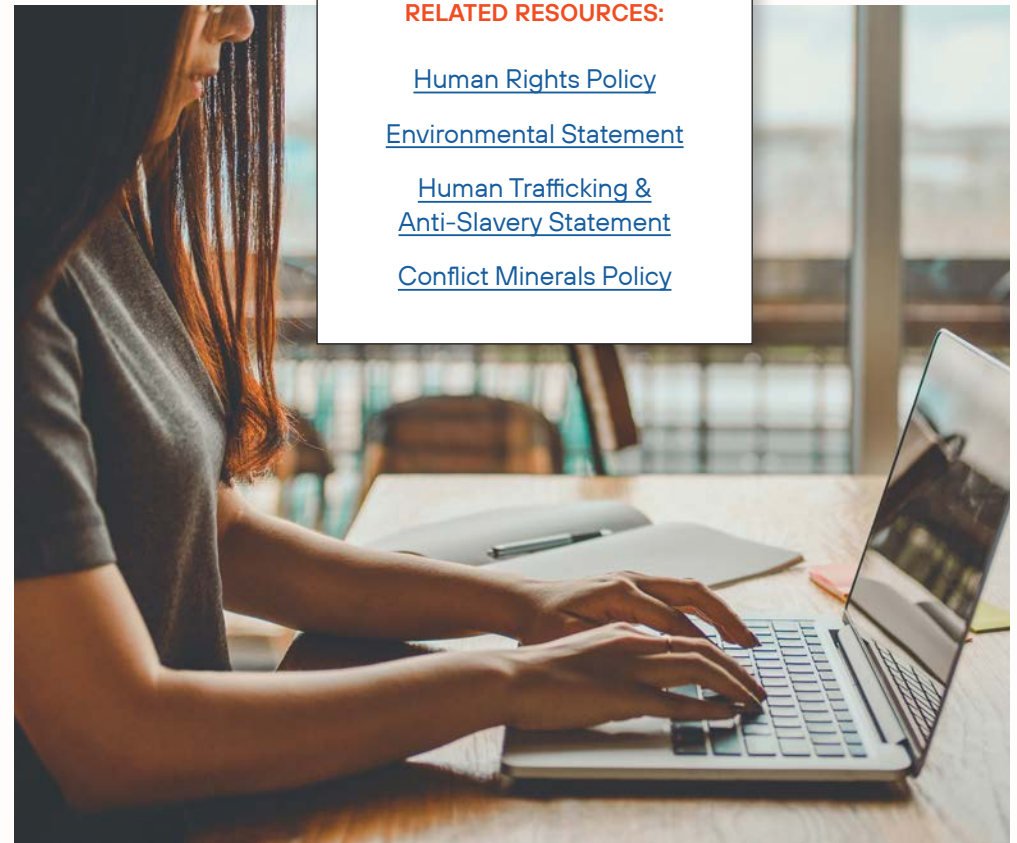
### RELATED RESOURCES:

[Human Rights Policy](#)

[Environmental Statement](#)

[Human Trafficking & Anti-Slavery Statement](#)

[Conflict Minerals Policy](#)



# Sponsorships, Political and Charitable Contributions

At Palo Alto Networks, we encourage you to support charitable organizations through Company-provided charitable giving programs (matching gifts, dollars for doers, etc.). As a company, we do not support political parties or candidates for public office, nor do we reimburse employees for political contributions.

All charitable donations on behalf of Palo Alto Networks must be made directly to nonprofit charitable organizations, and any exceptions must be approved in accordance with the Corporate Nonprofit Sponsorship and Charitable Donation Policy.

## How We Empower Integrity:

- Keep your personal political activities separate from the work you do for Palo Alto Networks.
- Be clear that your beliefs are your own and not those of the Company.
- Do not use Company time, facilities, or any other resources to support unapproved personal political or charitable interests.



## Secured by Our Values

Our Company will never offer or provide charitable donations or sponsor any events or activities with the intent of corruptly influencing any Palo Alto Networks business relationships, including obtaining or retaining business or securing any improper business advantage. This allows us to inspire trust among our community and stakeholders.



### RELATED RESOURCES:

[Corporate Nonprofit Sponsorship and Charitable Donation Policy](#)

[Corporate Responsibility](#)



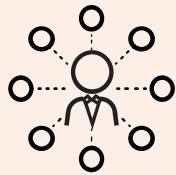
# Conclusion

Being **Empowered by Integrity** means that we can count on one another to follow our Code, live our values, and work towards making each day safer and more secure than the one before. Our Company-wide commitment to acting with integrity each day is what allows us to succeed.



## Remember, if you have questions or concerns about ethical conduct, please contact:

- Your supervisor or any member of local management
- [The Employee Relations Team](#)
- [The Global Ethics Team](#)
- [The Chief Compliance Officer](#)



## Contact our Ethics Helpline, which provides for an anonymous reporting option, online or by phone:

- Online: at [www.paloaltonetworks.ethicspoint.com](http://www.paloaltonetworks.ethicspoint.com)
- By Phone: For employees in the United States, call 1-855-266-7042. For employees outside of the United States, you may call the phone number listed at [www.paloaltonetworks.ethicspoint.com](http://www.paloaltonetworks.ethicspoint.com)