



OUR CODE OF CONDUCT

Living Our Values



A Message from George Kurian

From our inception, NetApp has been committed to building a model company. We strive to achieve market leadership by “Living Our Values” and fulfilling our commitments to our stakeholders: our customers, our shareholders, our employees, our partners, and our neighbors.

Working with integrity is the way we have been getting things done for more than 25 years. It is the foundation that supports our continued success.

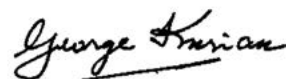
The NetApp Code of Conduct is a guide that helps us put our values into practice every day. It helps us meet our obligations to our stakeholders, and comply with the law and our own policies. By living our values every day, we will continue to foster an environment of mutual trust and respect, and continue to build on our global reputation for integrity.

Building a model company takes deep commitment across all levels of the organization. I count on you to know and follow our

Code. There may be situations where the right course of action is not obvious. I rely on you to ask questions anytime you are navigating an ethical or legal dilemma and to share your concerns anytime you see or suspect a violation of our Code. There are people and resources to help you like your Manager, your HR Business Partner, Legal, and our Integrity & Compliance Office.

NetApp has earned a reputation as one of the best places to work in the world. This is a strong differentiator for us, and it is up to all of us to protect that reputation.

Thank you for living our values and committing to act with the highest standards of integrity.



George Kurian
Chief Executive Officer

Contents

Our Values

Our Stakeholders

Our Code

- Why We Have a Code
- Our Code Applies to Us All
- What it Means for You
- Managers’ Additional Responsibilities
- Where to Go for Help
- Your Responsibility to Report Concerns
- No Retaliation Policy
- NetApp Compliance Hotline
- Investigations
- Waivers of our Code
- Ethics Decision Tree

Our Company

- Following the Law, our Code, and our Policies
- Financial Statements, Regulatory Filings, and Business Records
- Anti-bribery, Anti-corruption
- Gifts, Entertainment, and Business Courtesies
- Conflicts of Interest
- Government Contracting
- Antitrust and Competition
- Export Controls, Restricted Countries, Imports, and Anti-boycott
- Protection of Confidential Information
- Insider Trading
- Data Privacy and Security

4	Our People	26
5	Working at NetApp	27
6	Diversity and Anti-discrimination	28
7	A Harassment-free Workplace	29
7	Safety and Security	30
7	Theft and Fraud	31
8	Use of NetApp Resources	32
8	Speaking on Behalf of NetApp	33
8	Use of Social Media	34
8	Our Partners	35
9	Ethical and Legal Partnerships	36
9	Sales Contracts, Policies, and Processes	37
9	Procurement from Suppliers, Vendors, and Contractors	38
10	Supply Chain Relationships	39
11	Gathering Information about Competitors	40
12	Our Neighbors	41
13	Corporate Social Responsibility	42
14	Human Rights	43
15	Charitable and Political Activities	44
18	Respecting the Environment	45
19	Resources and Contact Information	46
20		
21		
22		
24		
25		

Living Our Values

Get Things Done!

Trust and Integrity

Our interactions are based on candor, honesty, and respect for individual contributions. We are committed to earning the trust and confidence of our teammates and to always acting for the absolute good of the whole.

Leadership

We lead by articulating and demonstrating our shared vision, values, and goals. We transform individual effort into high-performance teams that are prepared for expanding roles and challenges.

Simplicity

We embrace Einstein's principle that everything should be as simple as possible but no simpler. We maintain simplicity in our internal processes and structures with objectives that are succinct, quantitative, and time bound.

Adaptability

We embrace change to create competitive advantage. We remain agile, flexible, and nimble to thrive in an evolving business environment.

Teamwork

We achieve synergy through the skills and ideas of all participants. Through collaboration, we strive for win/win solutions to issues and problems. Personal success is realized through team achievements.

Go Beyond

We set extraordinary expectations and goals, and we believe in the job of achieving significant results. We embrace creativity, risk taking, and continuous improvement, enabling us to make and meet aggressive commitments.



Commitments to Our Stakeholders

Our Customers

Drive customers' success and earn their loyalty through products, services, and relationships that deliver new capabilities and unparalleled value.

Our Shareholders

Provide shareholders with exceptional value through predictable performance and significant growth in revenues and profits.

Our Employees

Attract and retain performance-oriented employees, who thrive by taking on challenging work in a supportive 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

Personal integrity, practiced on a daily basis, is the unshakeable foundation for corporate integrity. The values we share define who we are as a company and what we can expect from each other.

Why We Have a Code

For us, it has never been simply about what we do, but also who we are and how we do it. We strive to “Create a Model Company” through “Living Our Values” and our “Commitments to our Stakeholders.” 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 is 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 that our partners, service providers, customers, suppliers, vendors, and contractors will work ethically and legally and consistent with the standards in our Code and our policies. Our Code does not create any rights to continued employment and is not an employment contract.

We take our commitment to our values and to operating in an ethical and legal manner seriously. Anyone who violates our values, the law, our Code, or policies may be subject to disciplinary action, up to and including termination from employment with or without notice, in accordance with applicable law.

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

Demonstrate your commitment to our values, the law, our Code, and our policies through your words and actions and by setting clear expectations for your employees. Let them know they can come to you with questions and concerns without fear of retaliation from anyone. It is important that you understand your special obligation to report behavior that you know, or should know, is inconsistent with the way we do business.

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. However, there are other resources to help you, such as your Manager, your HR Business Partner, and Legal. See the Resources and Contact Information chart at the end of our Code 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 your issue or concern is not being addressed appropriately, contact the next level of management, your HR Business Partner, Legal, 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

NetApp has an open door policy which encourages employees to report any concern they feel should be addressed to their manager, Human Resources, 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 an option operated by an independent reporting service that allows you to speak up anytime. 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

Please note that certain countries in the Americas, EMEA, and APAC where NetApp does business may not allow certain concerns to be reported at all or to be reported anonymously via the hotline. 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 access and respond to the information regarding the allegation.

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 and as determined by NetApp. 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. 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

Under very specific circumstances, NetApp may waive a provision of our Code. Requests for waivers must be submitted to the Integrity & Compliance Office in writing and approved in advance.



Ethics Decision Tree

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





Our Company

We are committed to building a model company. We strive to achieve market leadership by living our values, 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 that 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 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, Legal, 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.
- Ask questions anytime you are unsure about the law, our Code, or our policies.



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 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 documenting accurately all partner, customer, supplier, vendor, contractor, and other contracts. All business relationships should be properly and accurately documented. NetApp does not allow any “off-books” accounts regardless of the purposes of the accounts. Further discussion of this topic is included in the Our Partners section of our Code, and in NetApp’s Business Partner Code of Conduct. Business records and communications can become public through litigation, investigations, or release in the media, so avoid exaggeration, colorful language, legal conclusions, and derogatory characterizations of NetApp, people, or other companies in NetApp communications including email, voicemail, 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. Never dispose of information that may be relevant to litigation or subject to a legal hold until you are authorized to do so by Legal or the Integrity & Compliance Office.

Questions and Additional Information

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

Our Company. Our Values. Our Code.

- Make sure information you report in NetApp financial statements, regulatory filings, and business records, including contracts, is accurate, honest, and complete.
- Remember, accurate recordkeeping is critical 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 or financial or business record misconduct or inaccuracy.





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.

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

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.

Questions and Additional Information

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

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 Legal 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 Legal 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 third parties that do not exceed \$100 U.S. (or local currency equivalent) in value. You may also give occasional entertainment or other business courtesies to third parties, which do not exceed \$150 U.S. (or local currency equivalent) in value per person. The person(s) being entertained must have a potential or actual business relationship with NetApp.

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 or 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. 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 Legal, the USPS Legal Group, or the Integrity & Compliance Office. Never give anything of value for the purpose of improperly influencing an official decision.



Accepting Gifts and Other Items

In general, you may accept from third parties occasional gifts, entertainment, and other business courtesies such as travel, which do not exceed \$100 U.S. (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 or the Integrity & Compliance Office.

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

Travel and Expenses

All NetApp travel must be in accordance with the following policies: Global Travel & Expense Policy, Global Travel Handbook, and the Expense Reimbursement Handbook.

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 Legal or the Integrity & Compliance Office with questions or concerns. For additional information, see the Finance website and the Integrity & Compliance Office website.

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 or the Integrity & Compliance Office for any exceptions to our policies.
- Do not give anything of value to government officials or state-owned entity employees without receiving approval in advance from Legal or the Integrity & Compliance Office.
- Follow our policies regarding recordkeeping and expense reports.



Preventing 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.

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 or 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, unusually complex deals that do not reflect a real business purpose, or attempts to evade record keeping 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. While it is impossible to list all of 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, has the potential for compromising NetApp proprietary, confidential information or intellectual property.
- **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 to 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.

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.

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.

Government Contracting

The sale of goods and services to customers owned in whole or in part by a government is heavily regulated and follows more strict rules than sales to commercial customers. The laws that apply to government contracting and to business communications with government officials, their prime contractors, or 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 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 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 Legal or the Integrity & Compliance Office for assistance. 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 Legal 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 Legal 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 more strict 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 Legal or the Integrity & Compliance Office.

Antitrust and Competition

We believe in a thriving marketplace, free and open competition, and expect every employee to promote positive business relationships and fair business practices. To comply with the letter and spirit of antitrust 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 Legal. 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 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 Legal or the Integrity & Compliance Office with questions or concerns.



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.

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 control, economic sanctions, import, customs, and other trade compliance laws, including those of the U.S. and other countries.

U.S. export control and economic sanction laws apply broadly to our products, technologies, and services, including transactions related to these items that occur in countries outside the U.S. Because our products typically contain U.S. technology, they are generally subject to U.S. laws.

Under U.S. export laws, our products are controlled for export to certain countries, entities, and persons and for certain end uses. In many cases, our products require government authorization in order to export. The U.S. has substantial export controls and economic sanctions against certain countries, such as Cuba, Iran, North Korea, Sudan, and Syria. Such restricted countries and end users change from time-to-time. We do not do business related to restricted countries or end users. NetApp products and technologies that move across international borders may be regulated by the export control, economic sanctions, import, customs, and other trade laws of more than one country.

Export control laws apply not only to shipments of our products and technologies, but also where they are hand-carried during traveling, or otherwise transferred such as through downloads. Even controlled technology, such as NetApp source code, which is exposed to certain foreign persons in the U.S., may be “deemed” an export.

Questions and Additional Information

Contact the Global Trade Compliance (GTC) team, Legal, 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 control, economic sanction, import, customs, and other trade compliance laws, including those of the U.S. and other countries.
- Understand that export of NetApp’s products, technologies, and services 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.

Protection of Confidential Information

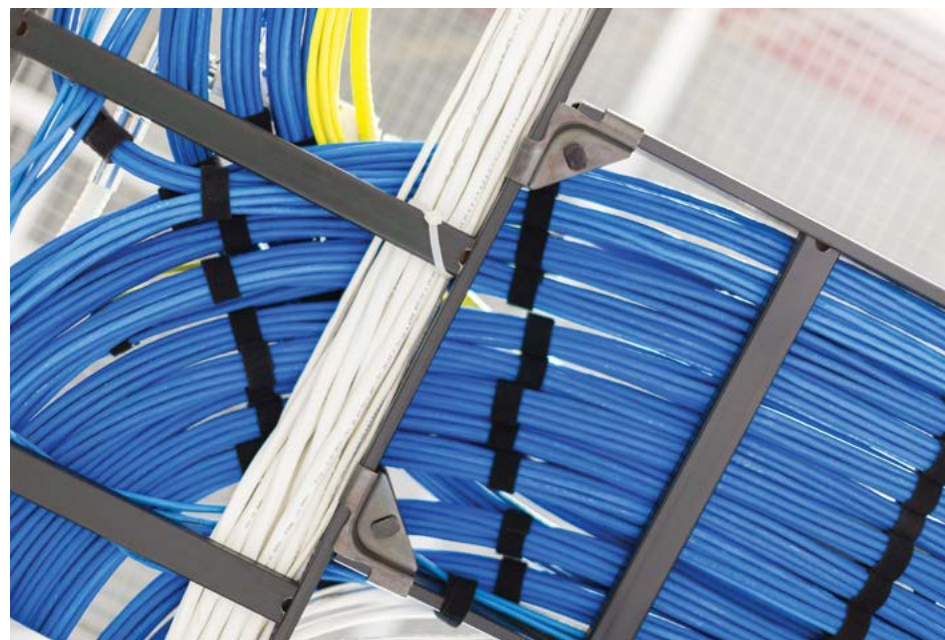
Our confidential information—including NetApp’s non-public business, financial, strategic, technical, and personal information—is among our company’s most valuable assets. This is information about NetApp, our products, or our customers, partners, suppliers, vendors, contractors, and fellow employees that you may be exposed 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 was 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 forecasts and projections, pricing strategies, and budget information
- Personal information about our employees—such as their health, salary, and performance information
- Third party information—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 you limit the amount of information shared to only what is required and make sure 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.

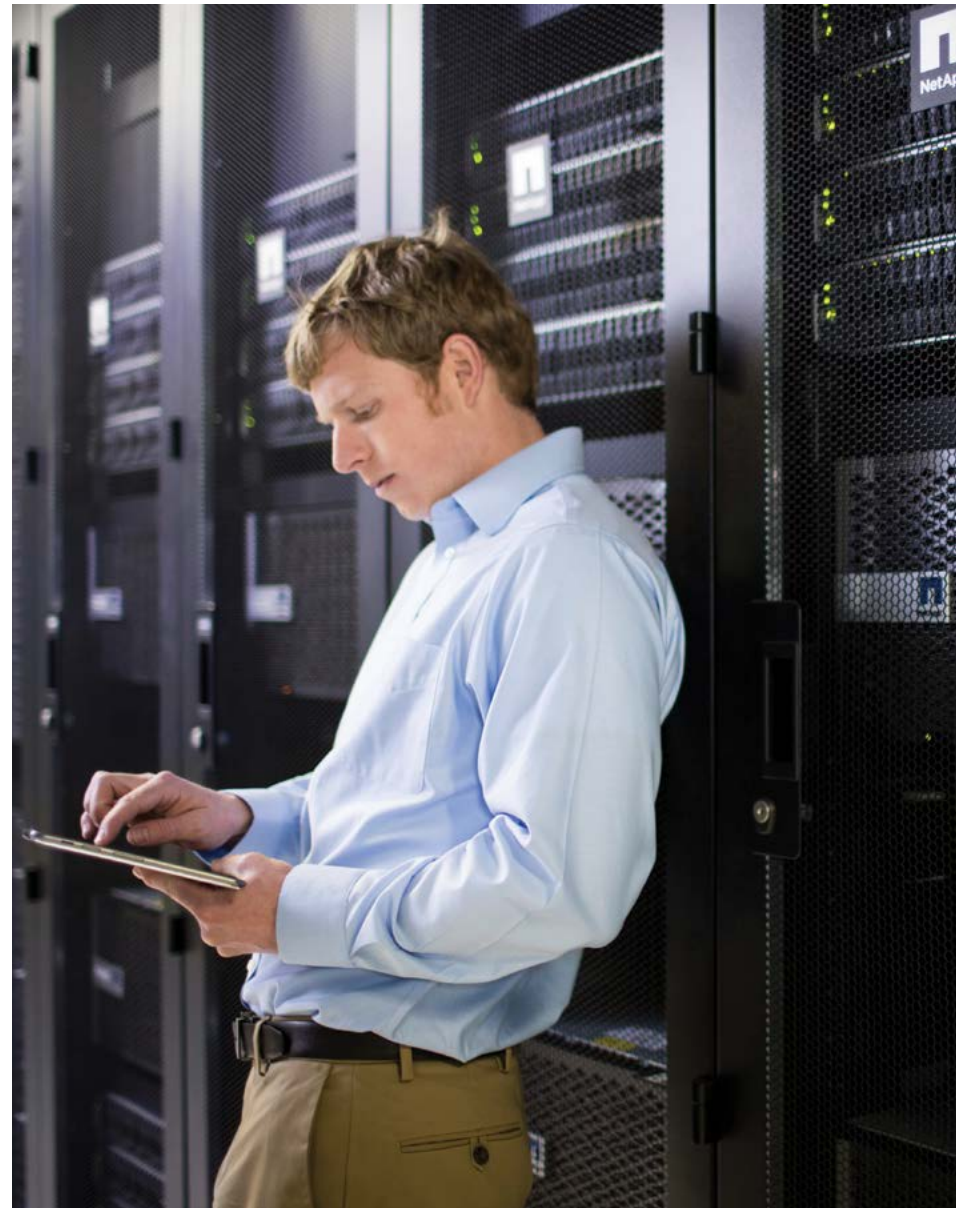


Questions and Additional Information

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

Our Company. Our Values. Our Code.

- Protect our confidential information—it is among our company's most valuable assets.
- 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 authorized to receive it.
- Take adequate precautions to protect confidential information by following NetApp's stated policies and procedures for handling confidential information.
- Do not use or share the confidential information of your former employer or others without their written consent.
- Understand that your obligation to protect NetApp's confidential information applies both during your employment and even if you leave NetApp.



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 whether or not 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 to be material and such results are considered to be nonpublic until one full trading day after the earnings release. Additional examples of material, nonpublic information include: estimates of future earnings, the gain or loss of a substantial customer or supplier, information about mergers or acquisitions, changes in executive management, significant transactions, and new projects contemplated.

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 non-public 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 Legal or the Integrity & Compliance Office with questions or concerns. To see the complete Insider Trading Policy, go to the Finance 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 unsure if information is considered “material” or “nonpublic,” do not trade on it until you have consulted with Legal or the Integrity & Compliance Office.

Data Privacy and Security

Personal information is any piece of information that can identify an individual, or is identifiable to an individual, either directly or indirectly. It can be one data element, such as a name, or a set of data elements strung together to identify a person, such as a name, employee ID, email address, and telephone 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 only collect, use or access personal information 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. Notify the information owner, Legal or the Integrity & Compliance Office if you have access to personal information you do not need so that your access rights can be terminated.

Unauthorized access to data and data security breaches are serious violations of privacy laws, and NetApp may be required to notify the appropriate authorities or people, if a breach is suspected or has occurred. Notify Legal or the Integrity & Compliance Office of any known or suspected unauthorized access to data of any kind, including employee data.

Questions and Additional Information

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

Our Company. Our Values. Our Code.

- Ask for help if you are unsure if 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 Legal or the Integrity & Compliance Office.



Our People

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

Working At NetApp

Our employees are our greatest asset. We take pride in attracting and retaining the very best talent in the industry based on a culture-fit approach. From the beginning, NetApp has worked to build a model company and embraced a culture of openness and trust.

Everyone who works at NetApp is expected to act responsibly, professionally, and according to our values and our commitments to our stakeholders, and to consider the impact of their actions on NetApp, their co-workers, and the culture we have worked hard to create and maintain. We have a unique environment where our employees are supported and encouraged to be innovative and where we communicate openly and transparently so that employees focus on critical and impactful work that ties directly to our business strategy. Employees lead with integrity.

Employees often say they joined NetApp because of our innovative technology, and they stay because of the people they work with and our culture. We strive to provide our talented workforce with the tools and resources it needs to preserve our world-class work environment. Our commitments are embodied in our own policies. Knowing and complying with these policies helps protect our culture and ensures a level of consistency and fairness across NetApp.

Questions and Additional Information

If you see or suspect a violation of our policies, contact your Manager, your HR Business Partner, Legal, 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.

Our People. Our Values. Our Code.

- 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.





Diversity and Anti-discrimination

We are not just a company of products, but of people, all working together in the spirit of collaboration. We celebrate the diversity of cultures, traditions, perspectives, and experiences that our employees represent. We strive to recognize each employee's individual contributions. NetApp is dedicated to a workplace that is free of unlawful discrimination.

Questions and Additional Information

Contact your Manager, your HR Business Partner, Legal, 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 in good faith.

Our People. Our Values. Our Code.

If you see or suspect discrimination or feel that you have been discriminated against or treated unfairly, report it to your Manager, your HR Business Partner, Legal, the Integrity & Compliance Office, or the NetApp Compliance Hotline.



A Harassment-free Workplace

NetApp is committed to promoting and maintaining a workplace free from unlawful harassment in any form. We prohibit conduct—whether intentional or unintentional—that results in unlawful harassment, abuse, or intimidation, based on characteristics as provided for by applicable law.

Your responsibility to promote a harassment-free work environment extends beyond the workplace to include company-related meetings, events, situations, and parties, including those held offsite.

Questions and Additional Information

Contact your Manager, your HR Business Partner, Legal, or the Integrity & Compliance Office with questions or concerns. You can also report any concerns you have via the NetApp Compliance Hotline. NetApp has a policy of not retaliating against anyone who reports concerns in good faith.

Our People. Our Values. Our Code.

If you see or suspect harassment, or feel you have been harassed, contact your Manager, your HR Business Partner, Legal, the Integrity & Compliance Office, or the NetApp Compliance Hotline.



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 you experience or witness on the job. 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’s property or at NetApp-sponsored events, unless otherwise prohibited by applicable state, federal or local law. If you feel unsafe or threatened, contact the Global Safety & Security team immediately for assistance.

Observe good security practices. Wear your NetApp identification badge whenever you are on NetApp’s 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.

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. Since marijuana continues to be illegal, as a matter of US federal law, state-authorized

marijuana use is not accepted as legitimate drug use under this policy, even in states or localities that have decriminalized or authorized use. As a US 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 the employee’s ability to perform his or her job safely. Please 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 Global Safety & Security team, or the Integrity & Compliance Office with questions or concerns. For additional information see the Global 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 behavior.
- NetApp is committed to a drug-free and alcohol-free workplace.

Theft and Fraud

We do not tolerate acts of theft or fraud. Stealing money, property, or company time or attempting to misrepresent, cheat, or deceive (through words, conduct, or concealment) in order to obtain some benefit, financial gain, 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 Global Safety & Security team, or the Integrity & Compliance Office with questions or concerns.

Our People. Our Values. Our Code.

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





Use of 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. Any improper use of these assets 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, 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 you create or receive in the course of your employment, including through NetApp’s network, applications, or assets and NetApp-issued devices; 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.

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.

Speaking on Behalf of NetApp

We 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 or Investor Relations teams. Refer all legal or government inquiries to Legal.

If you are publishing white papers, technical reports, or marketing presentations, follow our marketing guidelines and policies. Contact Legal if you have questions about whether certain information can be used or disclosed publicly.



Questions and Additional Information

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

Our People. Our Values. Our Code.

- Do not speak on behalf of NetApp unless you are authorized to do so.
- Direct all inquiries from third parties to the relevant contacts above.

Use of Social Media

We respect and encourage your use of social media as a means for exchanging ideas and building relationships, but use good judgment in your online activity and use social media in a way that is consistent with our policies. Never use social media to post or display any material, nonpublic information about NetApp in violation of NetApp’s Insider Trading Policy, NetApp proprietary or confidential information, or any other NetApp information that should not be disclosed publicly. Respect your obligation to protect proprietary and confidential information about NetApp and the proprietary and confidential information of companies with which we do business. Always follow copyright, fair use, and financial disclosure laws.

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.

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 or NetApp Image Library, including corporate logos, icons, photographs, and other assets. 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 Social Media Marketing team, Legal, 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 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 customers.

Ethical and Legal Partnerships

We understand the value of having excellent business partnerships with our partners, 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, and our policies. We rely on you to act in the best interests of NetApp with respect to our business partnerships and to apply fair 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, our policies, and the Business Partner Code of Conduct. 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, Legal, 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.



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 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, antitrust and competition, and export controls discussed earlier in the Our Company section of our Code.

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. It requires that:

- You completely and accurately document the entire offer and price for products and services in the quote, the quote is approved, and the quote is accepted by a valid purchase order (PO). This means we have solid evidence of the complete arrangement.
- The price is fixed, approved, and the same on both the quote and the PO.
- All elements of the arrangement, such as shipping and payment terms, and all contingencies are explicitly indicated on the approved quote.
- The company with which we are dealing is considered creditworthy and collection of what we are owed is probable.

There are certain sales practices that 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, Finance, Legal, or the Integrity & Compliance Office with questions or concerns. For additional information, see the Finance website.

Our Partners. Our Values. Our Code.

- Make sure 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.
- 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.





Procurement from Suppliers, Vendors, and Contractors

We treat our suppliers, vendors, and contractors with integrity and professionalism and, in our dealings with them, 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 Legal or the Integrity & Compliance Office.

Questions and Additional Information

Contact the Global Sourcing Services (GSS) team, Legal, or the Integrity & Compliance Office with questions or concerns.

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 do not 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, check to ensure that our contracts clearly address responsibilities and risks and that the invoices they submit to us are honest, accurate, and complete.



Supply Chain Relationships

We source components and assemblies for our products from suppliers, in several 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.

Questions and Additional Information

Contact the Supply Chain Management team, Legal, or the Integrity & Compliance Office with questions or concerns.

Our People. 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.



Gathering Information about Competitors

Although it is standard practice within 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 regarding 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 Legal or the Integrity & Compliance Office.



Questions and Additional Information

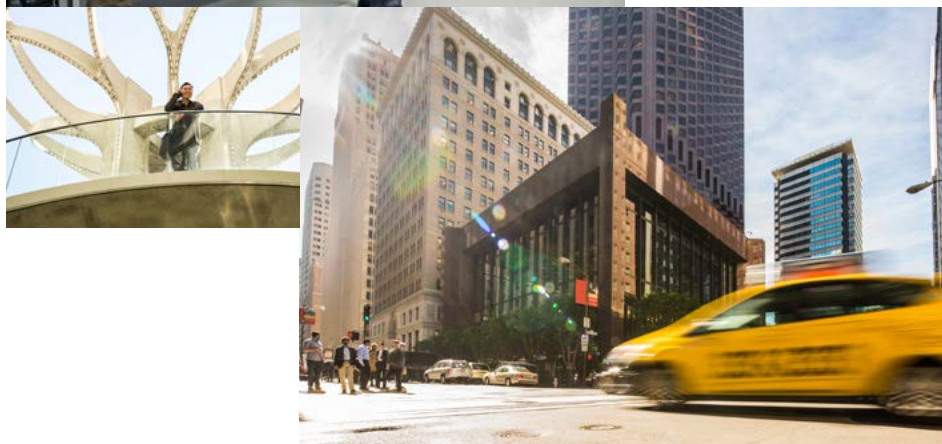
Contact Legal or the Integrity & Compliance Office with questions or concerns.

Our Partners. Our Values. Our Code.

- Gather competitive information through ethical and legal means.
- If you receive confidential information that you are unauthorized to view, or if you suspect that someone is violating our policies regarding the gathering of competitive information, contact Legal or the Integrity & Compliance Office.

Our Neighbors

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



Corporate Social Responsibility

We strive to be a good corporate citizen and model company in the communities where we live and work. We recognize that we have obligations to people, partners, and the planet, and we take those obligations seriously. As a company, we are committed to contributing time, talent, products, services, and money to groups like non-profit organizations and schools in the vicinity of major global NetApp employee population centers. We also encourage our employees to use NetApp Volunteer Time Off and give back to their communities.

Questions and Additional Information

Contact your Manager, your HR Business Partner, Legal, 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.



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 slavery and human trafficking statement each financial year which 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, Legal, or the Integrity & Compliance Office with questions or concerns.

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.

Charitable and Political Activities

We encourage you to perform volunteer service with non-profit organizations and schools in your communities as part of our commitment to being a good corporate citizen using our Volunteer Time Off (“VTO”) program. Our Global Giving team and website provides information about both our volunteer opportunities and VTO policies. Make sure your NetApp volunteer time is lawful and consistent with our policies.

All NetApp donations, whether monetary, product, or otherwise, must be consistent with our giving goals and policies and approved in advance. Unless you receive approval in advance, do not use or donate NetApp funds or assets (including facilities, equipment, or trademarks) for, seek reimbursement of a donation for, or suggest NetApp has supported or endorsed a charitable or political cause, issue, or candidate.

Political contributions of any kind made by or on behalf of NetApp are strictly prohibited.

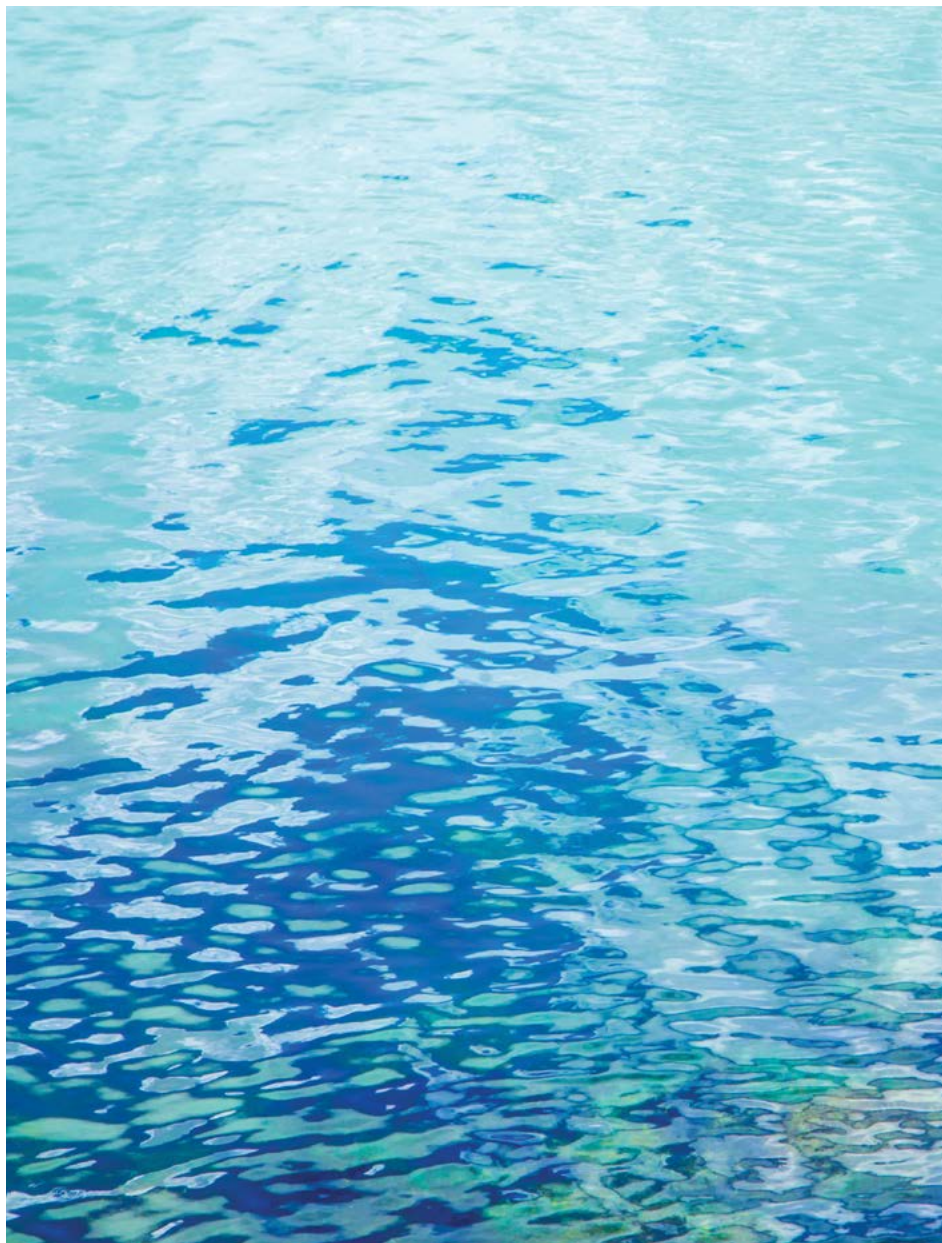
Questions and Additional Information

Contact your Manager, your HR Business Partner, or the Integrity & Compliance Office with questions or concerns. For additional information, see the Global Giving website.

Our Neighbors. Our Values. Our Code.

- See NetApp’s Global Giving website for ideas regarding how you can volunteer using NetApp’s Volunteer Time Off program.
- Receive approval in advance to use NetApp funds or assets.





Respecting the Environment

We are 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 sustainability, environmental responsibility, and environmental compliance.

Be alert to environmental issues and honor our shared commitment to prevent pollution, conserve natural resources, reduce waste, and minimize any impact to the air, water, and land.

Questions and Additional Information

Contact your Manager, Workplace Resources, Legal, or the Integrity & Compliance Office with questions or concerns.

Our Neighbors. Our Values. Our Code.

- Do your part to promote sustainability and environmental responsibility.
- Consult the Workplace Resources team to learn more about our environmental goals and objectives.

Resource:	Contact Information:
Integrity & Compliance Office (ICO)	Email: ng-integrity@netapp.com Email: ng-privacy@netapp.com Website: http://legal.corp.netapp.com/ico/ Website: https://netapp.sharepoint.com/sites/legal/DataGovernance Mail: NetApp, Inc. Attention: Integrity & Compliance Office 1395 Crossman Avenue Sunnyvale, CA 94089
NetApp Compliance Hotline	Report concerns via the Internet: All countries except for the EU, Spain, and Portugal: NetApp Compliance Hotline EU Countries: NetApp Compliance Hotline – EU Countries Spain and Portugal: NetApp Compliance Hotline – Spain and Portugal Report concerns via the telephone: From the U.S. and Canada: 1-855-226-5542 From outside the U.S. and Canada: 1) Go to http://www.business.att.com/bt/access.jsp 2) Find your country in the alphabetical listing. 3) Locate your direct code that is listed for your country in the AT&T Direct Code column. 4) Dial the AT&T Direct Code. 5) When prompted, dial: 855-226-5542.
Human Resources (HR)	Website: http://hr.netapp.com/home/
Legal	Website: http://legal.corp.netapp.com
Audit	Email: ng-internal-audit@netapp.com Mail: NetApp Board of Directors Audit Committee c/o Corporate Secretary 1395 Crossman Avenue Sunnyvale, CA 94089
Global Safety & Security Workplace Resources	Email: sas24@netapp.com Website: http://sas.netapp.com/
Global Trade Compliance	Email: gtc@netapp.com Website: https://systems-software.netapp.com/operations/customer-fulfillment/gtc/
Global Sourcing Services	Website: http://prodops.netapp.com/operations/inproc/gss/
Supply Chain Management	Website: http://prodops.netapp.com/operations/ops-planning/