

The background of the slide features a photograph of a modern building with large glass windows, partially obscured by tall, golden-brown grass in the foreground. The text is overlaid on this image.

# A10 Networks, Inc. Code of Business Conduct and Ethics

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## Letter from the CEO, DhruPAD Trivedi

A10 prides itself on delivering advanced technologies, innovation and enhanced capabilities in a way that advances society by fostering an inclusive environment for opportunity. Our mission is to foster increased connectivity and deliver a safer internet for all. From its inception, we have committed ourselves to the highest standards of business and professional conduct and compliance. We say what we mean and mean what we say. We are trustworthy, honest, open, equitable, and strive to always do the right thing. We know that engaging in deceptive, misleading, illegal, or unethical business practices would reflect unfavorably on A10, its employees and its technology, so we must never engage in such behavior. Ultimately, it would hurt our overall vision.

Given our appreciation of these matters and commitment to doing the right thing, our employees, customers, partners, and stakeholders around the world trust us and the products and services we deliver. We have crafted A10's Code of Business Conduct and Ethics to reflect these values and provide you with information regarding the Company's expectations of you in your business dealings with the hope that it will help you respond correctly,

and resolutely, to any ethical issues that you may encounter. Indeed, these principles and the related commitments we make to diversity, inclusion, and propriety should be evident in all our business dealings and interactions, including how we treat one another.

A10 does not tolerate harassment or discrimination of any kind and we want to make sure our employees, vendors, and customers know that they can share any concerns regarding ethical matters confidentially, without fear of adverse consequences, and in way that enables A10 to address any issues that may arise.

As such, if you have questions about whether a particular course of conduct or interaction is right, please speak up. Talk with your manager, contact HR or legal, or share your concerns anonymously through our third-party hotline by phone at 1.855.224.8217, or web intake at [A10networks.ethicspoint.com](https://a10networks.ethicspoint.com). We owe it to our customers, shareholders, vendors, communities, and each other to do so.

I expect that everyone associated with A10 will continue to comply with this Code as violations could result in great harm both to A10 and to you personally. Please use the Code as a source of information and a guide that will help you make good decisions as markets and products evolve all the time.

Thank you for your commitment to upholding our principles and values.

**DhruPAD Trivedi**  
CEO, Board Chairman, President  
A10 Networks

“ From its inception, we have committed ourselves to the highest standards of business and professional conduct and compliance. We say what we mean and mean what we say. ”

## Introduction

This Code of Business Conduct and Ethics (the “Code”) summarizes the ethical standards and key policies that guide the business activities of the directors, officers and employees of A10 Networks, Inc. and its subsidiaries, affiliates and related entities (the “Company”). The Code is designed to deter wrongdoing and:

- Promote honest and ethical conduct in all of the Company’s dealings, including but not limited to the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, management of relationships between people as individuals, entities and suppliers;
- Facilitate compliance with applicable laws, rules and regulations;
- Outline the Company’s position regarding environmental, social justice and governance concerns;

- Encourage and enable the prompt investigation and reporting of violations of this Code;
- Promote full, fair, accurate, timely and understandable disclosure in reports and documents we file with or submit to the U.S. Securities and Exchange Commission and in our other public communications; and
- Define accountability for adherence to this Code.

This Code applies to all directors, officers and employees of the Company who, unless otherwise specified, will be referred to collectively as “employees.” It is intended to outline, rather than definitively define, the Company’s position regarding the topics addressed herein so as to facilitate the ability of the Company’s employees to address the legal and moral decisions that come up in the course of their work for the Company in a consistent and appropriate manner. It is also noted that the Company’s contractors, consultants and agents are expected to read, understand and abide by this Code.

The Company believes that this should help guide your conduct in the course of A10’s business. However, as many of the principles described in this Code are general in nature, this Code cannot cover every situation that may arise. All employees are expected to use common sense and good judgment in applying this Code. **If you have any questions about applying this Code, it is your responsibility to seek guidance from the Company’s Legal Department ([legal@A10networks.com](mailto:legal@A10networks.com)).**

This Code is not the exclusive source of guidance and information regarding the conduct of A10’s business. You should consult applicable policies and procedures in specific areas as they apply. The Code is intended to supplement, not replace, the employee handbook and the Company’s other policies and procedures.

We are committed to regularly reviewing and updating our policies and procedures. The Company therefore reserves the right to amend, alter or terminate this Code at any time and for any reason, subject to applicable law.

Any violations of laws, rules, regulations or this Code should be reported immediately to the Legal Department. The Company will not allow retaliation against an employee for any such report made in good faith. Employees who violate this Code may be subject to disciplinary action up to and including termination of employment.





Part of your job and ethical responsibility is to help enforce this Code.

## Your Responsibilities

- You are expected to read and understand this Code.
- You must uphold these standards in day to day activities and comply with all applicable policies and procedures in this Code.
- Part of your job and ethical responsibility is to help enforce this Code. You should be alert to possible violations and promptly report violations or suspected violations of this Code. Please refer to “Procedural Matters—Reporting Violations” for more information.
- You must cooperate with investigations into possible Code violations and be truthful and forthcoming in the course of any such investigations.
- Reprisals, threats, retribution or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this Code or other Company policies, or against any person who is assisting in good faith in any investigation or process with respect to such a violation, is prohibited.
- In trying to determine whether any given action is appropriate, keep these steps in mind:
  - Obtain all relevant facts.
  - Assess the responsibilities and roles of those involved.
  - Use your judgment and common sense, and evaluate whether the action seems unethical or improper.
  - Seek guidance.
- If you are unsure about any situation or any provision of this Code, discuss the matter with your manager or responsible employees in the legal or human resources departments.

## General Standards of Conduct

### Overview

This Code of Conduct exists to promote ethical conduct and deter wrongdoing. Honest and ethical conduct is critical to A10's business. All employees, agents and contractors have a duty to comply with applicable law and to act in an honest and ethical manner. Honest and ethical conduct is reflected by activities that are free from fraud, deception, comports with relevant laws and is otherwise characterized by integrity.

A10 Networks is firmly committed to ensuring mutual respect and dignity in all aspects of employment.

### Compliance with Law

You are responsible for complying with all laws, rules, regulations and regulatory orders applicable to the conduct of the Company's business, both in letter and in spirit. You are expected to know the legal requirements relating to your duties as necessary to enable you to recognize potential dangers and to know when to seek advice from managers or other appropriate personnel. If you are located or engaging in business outside of the United States, you must comply with laws, rules, regulations and regulatory orders of the United States (including but not limited to the Foreign Corrupt Practices Act and U.S. export rules and regulations) as well as the applicable laws of other jurisdictions. If compliance with this Code ever conflicts with relevant laws, you must comply with the law.

Violations of laws, rules, regulations and orders may subject you to individual criminal or civil liability, in addition to discipline by the Company. Violations may also subject the Company to civil or criminal liability or the loss of business.

### Diversity and Prohibitions Against Discrimination or Harassment

The Company believes a diverse workforce benefits the Company by enabling it to make decisions based on the collective input of employees whose experiences reflect the full panorama of life. To facilitate the creation of an environment in which all may thrive, the Company is firmly committed to ensuring mutual respect and dignity in all aspects of employment and will not tolerate unlawful discrimination or harassment of any kind. To be clear, the Company is an equal opportunity employer and makes employment decisions on the basis of merit and business needs. The Company also strictly prohibits harassment of any kind and does not permit harassment, discrimination, derogatory comments or adverse employment actions based on race, color, creed, age, sex, gender, gender expression, gender identity, religion, religious creed, national origin, ancestry, marital status, family status, political belief, sexual orientation, physical or mental disability, medical condition or any other characteristics protected under federal or state law or local ordinance.

All employees are responsible for understanding all applicable discrimination and harassment laws and Company policies. Employees should always use common sense and respect others.



## Health and safety

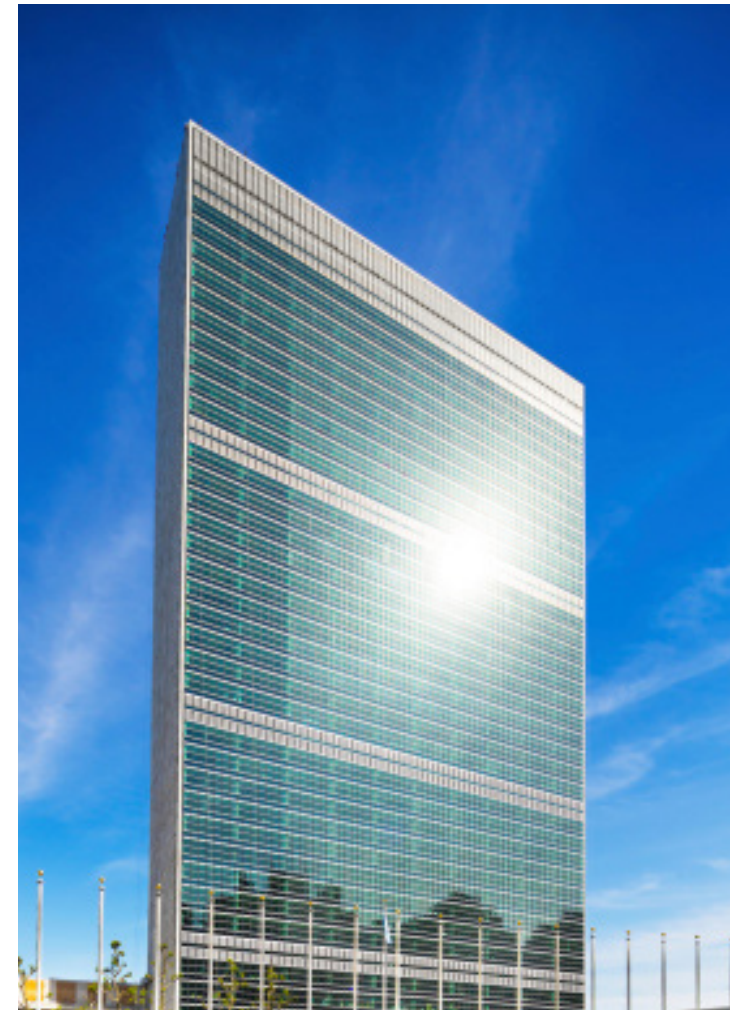
A10 strives to provide employees with the tools they need to do their jobs in safe and healthy working environments. Each employee has a responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are strictly prohibited. Employees shall report to work in a condition appropriate to perform their duties, free from the influence of illegal drugs or alcohol. The use or possession of illegal drugs in the workplace will not be tolerated. Weapons, likewise, licensed or unlicensed, should not be brought onto A10's premises without the knowledge and consent of A10's relevant facility manager.

## Human Rights

A10 supports the United Nations Global Compact and the protection of internationally proclaimed human rights and labor standards. As such A10: 1) strictly prohibits human trafficking and child labor; 2) provides compensation fairly and in accordance with local law; 3) expects workloads and workdays to be reasonable and in compliance with local law; 4) will not allow harsh or inhumane treatment of its workers; and 5) will encourage and comport with the principles that enable working environments that are free of harassment and unlawful discrimination.

## Conflict Minerals

A10 expects all of its suppliers to support international human rights and levels of integrity comparable to those of A10. In furtherance of this principle, the Company supports and complies with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and requires companies to disclose whether the products they manufacture or contract to manufacture contain conflict minerals that originated in the Democratic Republic of the Congo (DRC) or other Covered Countries. Towards this end, A10 has adopted a Conflict Minerals Policy to address its policy on this topic as well as its expectations of its suppliers. You may review this policy at A10 Networks Conflict Mineral Policy.



A10 supports the United Nations Global Compact and the protection of internationally proclaimed human rights and labor standards.

## Avoiding Conflicts of Interest

### Overview

Your decisions and actions in the course of your employment with the Company should be based on the best interests of the Company, not on personal relationships and/or to seek personal benefits. You should seek to avoid situations where your personal activities, interests and relationships conflict, or appear to conflict, with the interests of the Company, except under guidelines approved by the Board of Directors (the “Board”). This includes situations where you may have or appear to have an indirect conflict through, for example, a significant other or a relative or other persons or entities with which you have a business, social, familial, personal or other relationship. A conflict may

also arise when you take actions or have interests that make it difficult for you to perform your work for the Company objectively and effectively. You must disclose to your manager any interest that you have that may, or may appear to, conflict with the interests of the Company.

There are a variety of situations in which a conflict of interest may arise. While it would be impractical to attempt to list all possible situations, some common types of conflicts are discussed below.

### Outside Employment and Directorships

As a general principle, employees should not engage in any activity or work that could interfere with his or her performance or responsibilities to A10. Thus, if an employee (other than a non-employee director) would like to serve on the board of directors of a profit-related organization or enter into an employment or consulting relationship with a profit-related organization, the employee must obtain approvals from his or her manager and from A10’s General Counsel (or, in the case of A10’s Chief Executive Officer, the approval of the Nominating and Corporate Governance Chair). Permission will not be granted if an employee asks to serve as a director or otherwise work for a competitor of A10 or to engage in activities that compete with it.

Further, unless you are a non-employee director of the Company, you may not perform services as a director, employee, agent or contractor for a customer, a supplier or any other entity that has a business relationship with the Company without approval from the Company. Non-employee directors of the Company must also promptly inform the Company of any such service.

Although the Company encourages employees to serve non-profit organizations in their individual capacity and on their own time they should advise the Company of such services and obtain the approval of their manager before doing so. All managers are expected to use good judgment in considering such requests and, if there is a potential conflict of interest advise the employee accordingly and notify the Company’s General Counsel for discussions on the topic.

### Financial Interests in Other Companies

Unless you are a non-employee director of the Company, you should not have a material financial or controlling interest—including an indirect interest through, for example, a relative or significant other—in any organization if that interest would give you or would appear to give you a conflict of interest with the Company. You should be particularly sensitive to financial interests in competitors, suppliers, customers, distributors and strategic partners. If you are a non-employee director of the Company with such an interest, you must promptly inform the Company thereof and must recuse yourself from any Board decision to which that interest might be relevant or create an appearance of a conflict in the decision.



## Transactions with the Company

If you have a significant financial interest in a transaction involving the Company—including an indirect interest through, for example, a relative or significant other or a business entity—you must disclose that interest, and that interest must be approved by the Company. If you are a non-employee director of the Company with such an interest, you must recuse yourself from any Board decision to which that interest might be relevant or create an appearance of a conflict in the decision. We encourage you to seek guidance if you have any questions as to whether an interest in a transaction is significant. Any dealings with a related party must be conducted in such a way that no preferential treatment, insight, preference or information is given to that business.

## Corporate Opportunities

You may not directly or indirectly exploit for personal gain any opportunities that are discovered through the use of corporate property, information or position unless the opportunity is disclosed fully in writing to the Board or its designated committee and the Board or its designated committee declines to pursue the opportunity. Said another way you may not take for yourself (or for the benefit of any family member) opportunities that are discovered through the use of corporate property, information or position in the course and scope of your work for the Company unless the opportunity is properly disclosed to the Company and approved by it.

## Loans by the Company

Loans from the Company to directors and executive officers are prohibited. Loans from the Company to other officers and employees may be permitted, but approval must be received in advance from the Board or its designated committee. Any and all such loans must be properly documented in a legally enforceable manner.

## Improper Benefits

You may not receive any improper benefit, information or preference as a result of your position with the Company. As such, employees are prohibited from personally taking for themselves, or their family members, advantage of opportunities that are discovered through the use of corporate property, information or position for otherwise improperly using corporate property, information or position for personal gain or for the gain of their family members.

Violations of U.S. securities laws may result in civil and criminal penalties, including disgorgement of profits, civil judgments, fines and jail sentences.

## Prohibition on Insider Trading

Under U.S. securities laws, it is unlawful for any person who has “material” nonpublic information about a Company to trade in the stock or other securities of that Company or to disclose such information to others who may trade. Material nonpublic information is information about a company that is not known to the general public and that a typical investor would consider important in making a decision to buy, sell or hold securities. Violations of U.S. securities laws may result in civil and criminal penalties, including disgorgement of profits, civil judgments, fines and jail sentences.

You may not directly or indirectly—through, for example, significant others, family members or controlled entities—buy or sell stocks or other securities of the Company or any other company based on nonpublic information obtained from your work at the Company. This restriction also precludes trading in the shares of other companies about which employees or directors learn material, non-public information through the course of their employment or service with the Company. All employees also need to refrain from providing any “tips” or guidance to others reflecting nonpublic information under circumstances that suggest that you were trying to help them make an investment decision. These obligations are in addition to your obligations with respect to nonpublic information generally, as discussed above.

You should be aware that stock market surveillance techniques are becoming increasingly sophisticated, and the probability that U.S. federal or other regulatory authorities will detect and prosecute even small-level trading is significant. Insider trading rules are strictly enforced, even in instances when the financial transactions seem small.

For more information and additional insider trading rules and regulations applicable to you, please refer to the Company's Insider Trading Policy. If you have any questions at all regarding trading in the Company's securities, please contact the Company's General Counsel for guidance.

### Election or Appointment to Public Office

You may serve in an elected or appointed public office provided that the position does not create or appear to create a conflict of interest.

### Guidance and Approvals

Evaluating whether a conflict of interest exists, or may appear to exist, requires the consideration of many factors. We encourage you to seek guidance and approval from your manager and/or the Company's HR or Legal Department in any case where you have any questions or doubts. The Company may at any time rescind prior approvals to avoid a conflict of interest, or the appearance of a conflict of interest, for any reason deemed to be in the best interest of the Company.





## Public Communications

### Public Communications and Filings

The Company regularly files reports and other documents with regulatory authorities, including but not limited to the U.S. Securities and Exchange Commission and the New York Stock Exchange. In addition, from time to time the Company makes other public communications, such as issuing press releases. You should refrain from disclosing or discussing financial matters regarding the Company that have not previously been publicly disclosed in one of these manners. Employees and directors should refer all inquiries or calls from the press, from shareholders or from financial analysts to the Company's Chief Financial Officer for the preparation of a response in coordination with all relevant stakeholders. Likewise, employees and directors may not publish or make public statements that might be viewed as a statement on behalf of the Company without the prior approval of the Company's Chief Executive Officer, Chief Financial Officer or General Counsel, as appropriate. Any such statement must note that the publication or statement represents the views of the specific author and not of the Company. Please be mindful that any posts, "likes" and "re-posts" on social media could be construed as public statements; and as a result, you should use social media in compliance with this Code.

Depending upon your position with the Company, you may be called upon to provide information to help assure that the Company's public reports and communications are complete, fair, accurate and understandable. You are expected to use all

reasonable efforts to provide complete, accurate, objective, relevant, timely and understandable answers to inquiries related to the Company's public disclosures.

Individuals involved in the preparation of public reports and communications must use all reasonable efforts to comply with our disclosure controls and procedures, which are designed to ensure full, fair, accurate, timely and understandable disclosure in our public reports and communications.

If you believe that any disclosure is materially misleading or if you become aware of any material information that you believe should be disclosed to the public, it is your responsibility to bring this information to the attention of the General Counsel. If you believe that questionable accounting or auditing conduct or practices have occurred or are occurring, you should notify the Audit Committee of the Board.

### Communication Procedures

You may not communicate externally on behalf of the Company unless you are authorized to do so. The Company has established specific policies regarding who may communicate information to the public, the press, market professionals (such as securities analysts, institutional investors, investment advisors, brokers and dealers) and security holders on behalf of the Company:

- The Chief Executive Officer ("CEO"), the Chief Financial Officer ("CFO") and investor relations personnel, and their authorized designees, are our official spokespeople for financial matters.

- The CEO and corporate communications personnel, and their authorized designees, are our official spokespeople for public comment, press, marketing, technical and other such information.

You should refer all calls or other inquiries from the press, market professionals or security holders to the General Counsel, who will see that the inquiry is directed to the appropriate persons within the Company.

All communications made to public audiences on behalf of the Company, including formal communications and presentations made to investors, customers or the press, require prior approval of the General Counsel and the CFO.

You may not communicate externally on behalf of the Company unless you are authorized to do so. The Company has established specific policies regarding who may communicate information to the public, the press, market professionals (such as securities analysts, institutional investors, investment advisors, brokers and dealers) and security holders on behalf of the Company.

## Financial Reporting

### Overview

As a public company, A10 is required to comport with strict accounting principles and standards, to report financial information accurately and completely in accordance with these principles and standards, and to have appropriate internal controls and procedures to ensure that our accounting and financial reporting complies with law. The integrity of our financial transactions and records is critical to the operation of our business and is a key factor in maintaining the confidence and trust of our employees, security holders and other stakeholders.

### Compliance with Rules, Controls and Procedures

It is important that all transactions are properly recorded, classified and summarized in our financial statements, books and records in accordance with our policies, controls and procedures, as well as all generally accepted accounting principles, standards, laws, rules and regulations for accounting and financial reporting. If you have responsibility for or any involvement in financial reporting or accounting, you should have an appropriate understanding of, and you should seek in good faith to adhere to, relevant accounting and financial reporting principles, standards, laws, rules and regulations and the Company's financial and accounting policies, controls and procedures. If you are a senior officer, you should seek to ensure that the internal controls and procedures in your business area are in place, understood and followed.

### Accuracy of Records and Reports, Recordkeeping

The Company is required by local, state, federal, foreign and other applicable laws, rules and regulations to retain certain records and to follow specific guidelines in managing its records. Records include paper documents, email, compact discs, computer hard drives, floppy disks, microfiche, microfilm and all other recorded information, regardless of medium or characteristics. Civil and criminal penalties for failure to comply with such guidelines can be severe for employees, agents, contractors and the Company.

It is important that those who rely on records and reports—managers and other decision makers, creditors, customers and auditors—have complete, accurate and timely information. False, misleading or incomplete information undermines the Company's ability to make good decisions about resources, employees and programs and may, in some cases, result in violations of law. Anyone involved in preparing financial or accounting records or reports, including financial statements and schedules, must be diligent in assuring that those records and reports are complete, accurate and timely. Anyone representing or certifying as to the accuracy of such records and reports is expected to make an inquiry and complete their review adequate to establish a good faith belief in their accuracy. The provision or reporting of false or misleading records or documentation is strictly prohibited.

Even if you are not directly involved in financial reporting or accounting, you are likely involved with financial records or reports of some kind—a voucher, time sheet, invoice or expense report. In addition, most employees have involvement with product, marketing or administrative activities, or performance evaluations, which can affect our reported financial condition or results. Therefore, the Company requires and expects all employees (including you), regardless of whether you are otherwise required to be familiar with finance or accounting matters, to use all reasonable efforts to ensure that every business record or report with which you deal is accurate, complete and reliable.



In addition, all employees must comply with all of the Company's policies as well as with all relevant laws and regulations regarding the preservation of records. Records should be retained or destroyed in accordance with the Company's document retention policies. Any questions about these policies should be directed to the company's IT team.

## Legal Holds

You should consult with the General Counsel regarding the retention of records in the case of actual or threatened litigation or government investigation to determine if a legal hold should be put in place. A legal hold suspends the Company's document destruction procedures to preserve specified records under special circumstances, such as litigation or government investigations. The Company's legal department will notify employees and directors if a legal hold is placed on records for which they are responsible. If such a hold is put in place the relevant employees and directors must not destroy, alter or modify records or supporting documents under any circumstances. Legal holds remain in effect until officially released in writing by the General Counsel or designated Legal Department attorney. If an employee or director is unsure whether a document has been placed under a legal hold, the employee or director should preserve and protect that document and ask the Legal Department

## Intentional Misconduct

You may not misrepresent the Company's financial performance or otherwise intentionally compromise the integrity of the Company's reports, records, policies and procedures. For example, you may not:

- Report information or enter information in the Company's books, records or reports that fraudulently or intentionally hides, misrepresents or disguises the true nature of any financial or non-financial transaction or result;
- Establish any undisclosed or unrecorded fund, account, asset or liability for any improper purpose;
- Enter into any transaction or agreement that accelerates, postpones or otherwise manipulates the accurate and timely recording of revenues or expenses;
- Intentionally misclassify transactions as to accounts, business units or accounting periods; or
- Knowingly assist others in any of the above.

## Dealing with Auditors

Our auditors have a duty to review our records in a fair and accurate manner. You are expected to cooperate with independent and internal auditors in good faith and in accordance with law. In addition, you must not fraudulently induce or influence, coerce, manipulate or mislead our independent or internal auditors regarding financial records, processes, controls or procedures or other matters relevant to their engagement. You may not engage, directly or indirectly, any outside auditors to perform any audit, audit-related, tax or other services, including consulting, without written approval from the CFO.

## Obligation to Investigate and Report Potential Violations

You should make appropriate inquiries in the event you perceive financial or other potential irregularities or inaccurate statements, for example:

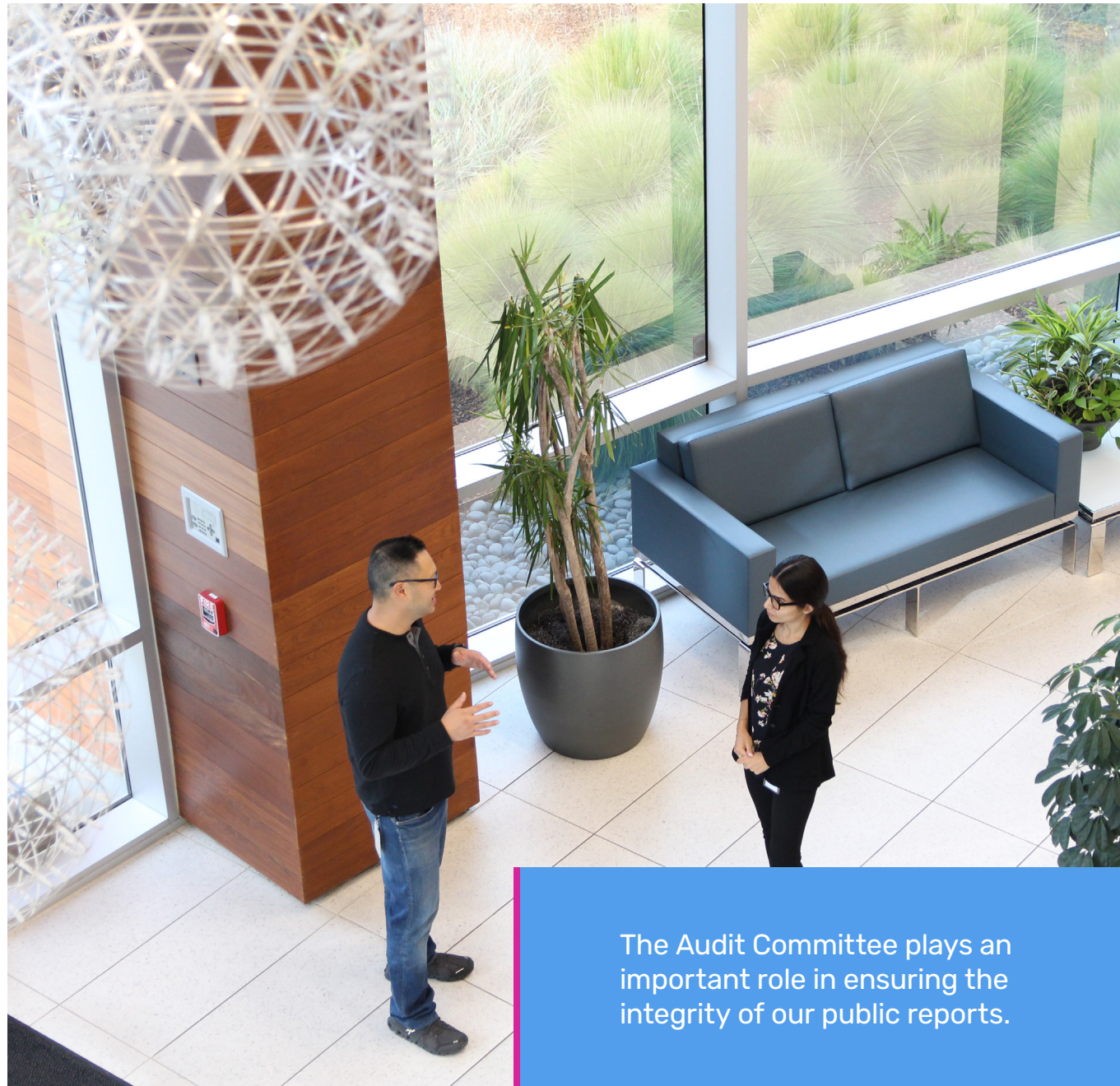
- Financial results that seem inconsistent with underlying business performance;
- Inaccurate financial records, including travel and expense reports, time sheets or invoices;
- The circumventing of mandated review and approval procedures;
- Transactions that appear inconsistent with good business economics;
- The absence or weakness of processes or controls; or
- Persons within the Company seeking to improperly influence the work of our financial or accounting personnel, or our external or internal auditors.

Dishonest or inaccurate reporting can lead to civil or even criminal liability for you and the Company and can lead to a loss of public faith in the Company. You are required to promptly report any case of suspected financial or operational misrepresentation or impropriety to the Company's General Counsel.

## Keeping the Audit Committee Informed

The Audit Committee plays an important role in ensuring the integrity of our public reports. If you believe that questionable accounting or auditing conduct or practices have occurred or are occurring, you should notify the Audit Committee of the Board. In particular, the CEO and senior financial officers such as the CFO and the Controller should promptly bring to the attention of the Audit Committee any information of which he or she may become aware concerning, for example:

- The accuracy of material disclosures made by the Company in its public filings;
- Material weaknesses or significant deficiencies in internal control over financial reporting;
- Any evidence of fraud that involves an employee who has a significant role in the Company's financial reporting, disclosures or internal controls or procedures; or
- Any evidence of a material violation of the policies in this Code regarding financial reporting.



The Audit Committee plays an important role in ensuring the integrity of our public reports.



## Safeguarding Company Assets

### Overview

All employees, agents and contractors are responsible for the proper and efficient use of Company assets, and all such assets should be used for legitimate business purposes. This responsibility applies to all of the Company's assets, including your time, work and work product; cash and accounts; physical assets such as inventory, equipment, vehicles, computers, systems, facilities and supplies; intellectual property, such as patents, copyrights, trademarks, inventions, technology and trade secrets; and other proprietary or nonpublic information. Theft, carelessness and waste are strictly prohibited.

- You should use all reasonable efforts to safeguard Company assets against loss, damage, misuse or theft.
- You should be alert to situations that could lead to loss, damage, misuse or theft of Company assets, and should report any loss, damage, misuse or theft as soon as it comes to your attention.
- You should not use, transfer, misappropriate, loan, sell or donate Company assets without appropriate authorization.
- You may incur and seek reimbursement only for your legitimate business expenses with proper supporting documentation incurred in accordance with A10's travel, expense and related policies.
- You must take reasonable steps to ensure that the Company receives good value for Company funds spent.
- You should take all actions necessary to protect the Company's name as well as its intellectual property, never forgetting that ideas, concepts, inventions, trademarks, trade secrets, patents and copyrights as well as business and marketing plans, engineering and manufacturing charts, ideas and designs are valuable Company property that both warrant and need your protection.
- You may not use any Company assets (including company intellectual property) in a manner that would result in or facilitate the violation of law.
- You should use and safeguard assets entrusted to the Company's custody by customers, suppliers and others in the same manner as Company assets.

## Protecting the Company's Information

In the course of your involvement with the Company, you may come into possession of information that has not been disclosed or made available to the general public. This nonpublic information may include, among other things:

- Financial data and projections;
- Proprietary and technical information, such as trade secrets, patents, inventions, product plans and customer lists;
- Information regarding corporate developments, such as business strategies, plans for acquisitions or other business combinations, divestitures, major contracts, expansion plans, financing transactions and management changes;
- Personal information about employees; and
- Nonpublic information of customers, suppliers and others.

If you have any questions as to what constitutes nonpublic information, please consult the General Counsel.

All nonpublic information must only be held in confidence by A10's employees and directors and used only for A10's business purposes. You have an obligation to use all reasonable efforts to safeguard the Company's nonpublic information. You may not disclose nonpublic information to anyone outside of the Company, except when disclosure is required by law or when disclosure is required for business purposes and appropriate steps have been taken to prevent misuse of that information. This responsibility includes not disclosing nonpublic information in Internet discussion groups, chat rooms, bulletin

boards or other electronic media. In cases where disclosing nonpublic information is required or necessary, you should coordinate with the General Counsel. The misuse of nonpublic information is contrary to Company policy and may also be a violation of law.

Each employee, other than non-employee directors, is required to sign an Employment, Confidential Information and Invention Assignment Agreement that addresses the use and disclosure of confidential information of the Company.

## Protection of Personal Information and Data

A10 protects and respects the privacy of the data people entrust to us including data provided by employees as well as information provided by A10's investors, customers, suppliers and other third parties with whom it does business. Each employee shares in this responsibility to protect the privacy and secure personal information collected, stored, processed, transmitted, shared or disposed of by A10 in accordance with all applicable data

protection and privacy laws and regulations as well as Company policies. Personal information, which is generally defined as any information that alone or in combination with other information can be used to identify an individual, warrants special attention particularly if it includes medical records, data contained in our personnel records, and credit or banking information or other personal information regarding our customers' identities, details and data. Each of us has a responsibility not to share personal information with others who do not have a legitimate and authorized "need to know." In all cases, employees must take appropriate precautions and comply with Company policies to safeguard the privacy of the Company's confidential information and personal information, as well as all such material that third parties have entrusted to A10.

## Use of Company Equipment and Materials Including Computers.

All employees must care for any and all equipment that the Company provides them, using it responsibly for A10's business purposes. All computers, in particular, should only be used as permitted by A10's data security policies. As and when employees use A10 equipment offsite (at home, in coffee shops, airports, etc.) the employee must take all reasonable precautions to protect the equipment from loss, theft or damage. All employees must also remember that Company equipment remains the Company's property and that they must immediately return all Company equipment to it when their employment relationship with the Company ends. In addition, all computers and other electronic devices that are made accessible to employees to facilitate their performance of work for

the Company and protect its interests, whether used entirely or partially on the Company's premises or with the aid of the Company's equipment or resources, must remain fully accessible to the Company and will remain the sole and exclusive property of the Company. Employees should not have or maintain any expectation of privacy with respect to any electronic information stored on Company equipment or electronic communications made using Company equipment. Employees are directed to the Company's acceptable use policies regarding the use of company resources or contact IT for further details.

## Electronic Communications

Employees and directors must use email, social media tools, the internet and any other electronic communication device/forum in a legal, ethical, and appropriate manner. Electronic communications devices include computers, email, connections to the internet, intranet and extranet and any other public or private networks accessed from Company owned devices or networks as well as personal devices accessing corporate resources, voice mail, video conferencing, facsimiles, telephones or any other future types of electronic communication. Employees and directors may not post or discuss confidential information concerning Company products or business on the internet, social media or other forum and must use their good judgment to determine if they are using the Company's communication systems and equipment in an ethical and sound manner that comports with this policy, all relevant laws and the sound business practices generally.

Each of us has a responsibility not to share personal information with others who do not have a legitimate and authorized "need to know."

## Responsibilities to our Customers, Suppliers and Competitors

### Overview

A10 expects you to respect the rights of, and deal fairly with, the Company's customers, suppliers, business partners and competitors in compliance with law. You should not take unfair advantage of anyone through deception, misrepresentation, manipulation, coercion, abuse of privileged information or status, or any intentional unfair business practice.

### Customer Relationships

All A10 employees, contractors and associates are expected to act professionally and in a way that creates value for the Company's customers while concurrently building lasting relationships based upon trust. A10's relationships with its customers and the associated goodwill related to them are, ultimately, A10's most important assets; thus, each employee is expected, and required, to act in a way that preserves, protects and enhances A10's reputation and standing with our customers at all times.

### Selecting Suppliers

A10 believes all of its suppliers should have high standards of ethics and share the values and sense of social responsibility championed by A10. The Company's policy is to select suppliers based on the merits of their products, services and business practices and to purchase supplies based on need, quality, service, price and other terms and conditions of sale. You may not establish a business relationship with any supplier if you know that its business practices violate applicable laws.

The Company's policy is to purchase supplies and identify Suppliers based on need, quality, service, price and terms and conditions. Where reasonably feasible, A10 should choose significant suppliers and/or enter into significant supplier agreements only after running a competitive bid process. In selecting suppliers, the Company will treat all potential suppliers with respect and dignity and will not unlawfully discriminate. Further A10 will facilitate compliance with its procurement procedures and freedom of association. As such suppliers are and should be generally free to sell its products or services to any other party, including Company competitors, provided that the Company is not giving the supplier intellectual property that could, if used inappropriately by the Supplier or others, harm the Company. As such, if the Supplier's products or services have been designed, fabricated, or developed to the Company's specifications, the agreement between the parties may contain restrictions on sales that are consistent with applicable law.

### Use of Software

Only appropriately licensed software may be used to conduct Company business. The use or creation of illegal or unauthorized copies of any software is strictly prohibited and may expose the employee and the Company to potential civil and criminal liability. The Company's IT department may inspect any Company property (including computers) periodically to verify that only approved and licensed software has been installed, to the extent permitted by law and may remove any non-licensed/supported software without notice.

### Free and Fair Competition

It is our policy to lawfully compete in the marketplace. Our commitment to fairness includes respecting the rights of our competitors to compete lawfully in the marketplace and abiding by all applicable laws in the course of competing.

Most countries have well developed bodies of law designed to encourage and protect free and fair competition. These laws are broad and far-reaching and regulate the Company's relationships with its distributors, resellers, suppliers and customers. Competition laws generally address the following areas: pricing practices (including predatory pricing, price fixing and price discrimination), discounting, terms of sale, credit terms, promotional allowances, secret rebates, exclusive dealerships or distributorships, product bundling, restrictions on carrying competing products, termination and many other practices.



Competition laws also govern, usually quite strictly, relationships between the Company and its competitors. Collusion among competitors is illegal, and the consequences of a violation are severe. You must not enter into an agreement or understanding, written or oral, express or implied, with any competitor concerning prices, discounts or other terms or conditions of sale; profits or profit margins; costs; allocation of product, customers, markets or territories; limitations on production or supply; boycotts of customers or suppliers; or bids or the intent to bid, or even discuss or exchange information on these subjects. DO NOT make any agreements with our competitors on whether we will or will not bid on contracts. DO NOT disclose our offered prices to our competitors. And DO NOT collude with competitors regarding potential transactions, territories or markets.

The Company is committed to obeying both the letter and spirit of these laws, which are often referred to as antitrust, consumer protection, competition or unfair competition laws. Although the spirit of these laws is straightforward, their application to particular situations can be quite complex. To ensure that the Company complies fully with these laws, you should have a basic knowledge of them and should promptly involve our General Counsel when questionable situations arise.

## Improper Payments

You absolutely may not authorize, offer, promise or give, or solicit or accept, money, gifts, entertainment, privileges, gratuities, benefits or other items of value with the intent of improperly influencing, directly or indirectly, any business decision or that could otherwise violate law or create the appearance of impropriety. You should contact the General Counsel if you have any questions as to whether a payment is proper. The provision of any improper or questionable payment will be investigated with utmost seriousness. See the provisions of this Code related to the Foreign Corrupt Payment Act for additional information and instruction regarding this topic.

## Gifts and Entertainment

You may, from time to time, provide or accept business amenities to aid in building legitimate business relationships. Business amenities may include gifts, meals, services, entertainment, travel, reimbursements, loans, favors, privileges or other items of value.

Any business amenity should be consistent with customary business practice and should be reasonable and appropriate for the circumstance. Business amenities should not be lavish or excessive (e.g., tickets to a regular season football game may be OK, but tickets to the Super Bowl warrant additional consideration). Business amenities should not violate law or create an appearance of impropriety. You should avoid providing or accepting any cash payment, or other business amenity that can be construed as a bribe or payoff.

You should not accept a series of small gifts or entertainments that can be collectively construed as a larger, expensive gift or entertainment expense. You should also not accept “favors” such as the provision of a job or internship for a family member, etc. from a supplier or similar benefits that could be construed as means to impair the exercise of your independent judgment with respect to the Company’s business. You are also responsible for ensuring that any gift you accept, or provide, does not violate any laws or regulations (e.g., Foreign Corrupt Practices Act, UK Bribery Act, or any other local laws). All Company funds expended for business amenities must be accurately recorded in the Company’s books and records. We encourage you to contact the General Counsel if you have any questions as to whether a business amenity is permissible.

In some business situations outside of the United States, it is customary and lawful for business executives to present gifts to representatives of their business partners. These gifts may be of more than a nominal value, and under the circumstances, returning the gifts or paying for them may be an affront to the giver. If you find yourself in such a situation, you must report the gift to the General Counsel. In some cases, you may be required to turn the gift over to the Company.

Special restrictions apply when dealing with government employees. For more information, see the section on “Working with Governments”.

## Handling the Nonpublic Information of Others

All employees and directors must handle the nonpublic information of others responsibly and in accordance with our agreements with them. Nonpublic information of others includes notes, reports, conclusions and other materials prepared by a Company employee based on the nonpublic information of others.

You should not knowingly accept information offered by a third party, including a customer, supplier or business partner, that is represented as nonpublic, or that appears from the context or circumstances to be nonpublic, unless an appropriate nondisclosure agreement has been signed with the party offering the information. You should contact the General Counsel to coordinate the appropriate execution of nondisclosure agreements on behalf of the Company.

Even after a nondisclosure agreement is in place, you should accept only the information that is necessary or appropriate to accomplish the purpose of receiving it, such as a decision on whether to proceed to negotiate a deal. If more detailed or extensive information is offered and it is not necessary or appropriate for your immediate purposes, it should be refused. If any such information is inadvertently received, it should be transferred to the General Counsel for appropriate disposition.

Once the Company has received nonpublic information, you should use all reasonable efforts to:

- Abide by the terms of the relevant nondisclosure agreement, including any obligations with respect to the return or destruction of the nonpublic information;
- Limit the use of the nonpublic information to the purpose for which it was disclosed; and
- Disseminate the nonpublic information only to those other Company employees, agents or contractors with a need to know the information to perform their jobs for the Company, as may be set forth in the relevant nondisclosure agreement.

## Improperly Obtaining or Using Assets or Information

You may not unlawfully obtain or use the materials, products, intellectual property, proprietary or nonpublic information or other assets of anyone, including suppliers, customers, business partners and competitors. You must respect the copyrights of others and may not use software, services, or other copyrighted material, if doing so would violate the rights of a copyright holder or exceed the terms of a license. You may not coerce or improperly induce past or present employees of other companies to disclose proprietary or nonpublic information of their former or other employers. You are expected to advise A10's Legal Department if you become aware of any employees' abuse of third-party confidential information.



You should contact the General Counsel to coordinate the appropriate execution of nondisclosure agreements on behalf of the A10 Networks.

## Working With Governments

### Overview

Special rules govern our business and other dealings with governments (including national, provincial, state, municipal, city or other similar governmental groups). Employees and contractors of the Company should use all reasonable efforts to comply with all applicable laws and regulations governing contact and dealings with governments, government employees and public officials. Particular care must be exercised in any government purchasing decision because “public officials” (a broad term which includes officers, employees or consultants of a government or governmental department or agency as well as officers, directors, consultants, (etc.) of state-owned enterprise or

partially state-owned enterprises, political parties or public international organization such as the World Bank, World Health Organization, etc. AND the spouse of immediate family members of any of the persons mentioned above) are obligated to follow specific codes of conduct and laws. If you deal with governments, government employees or public officials, you should undertake to understand the special rules that apply. If you have any questions concerning government relations, you should contact the Legal Department.

### Government Contracts

You should use all reasonable efforts to comply with all relevant laws and regulations that apply to government contracting. As is the case with all contracting situations when working with governments of any sorts you need to make sure that your representations on behalf of A10 are accurate and that all submissions, including pricing, are current and complete. You must also take care to make sure you follow government procurement

rules carefully and refrain from any conduct that could be construed as improperly soliciting or seeking confidential information such as information about competitors' bids prior to the award of a contract. Likewise if/as you contact government personnel or public officials regarding their work you need to make sure it comports with the relevant tender processes and all relevant law. And finally, if you come across credible evidence of violations of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations or the civil False Claims Act in connection with the award, performance, or closeout of a U.S. government prime contract or subcontract, you may be required to report such information to government in writing.

Ultimately, you should refer any contract with any governmental entity to the Legal Department for review and approval as well as any questions you may have regarding same.

### Requests by Regulatory Authorities

A10 will comply and cooperate with appropriate government inquiries and investigations in accordance with law. A10 may, in the context of such cooperation, need to make some filings under seal to protect the legal rights of the Company with respect to its nonpublic information. All government requests for Company information, documents or investigative interviews should be referred to the Legal Department. Said another way, you need to work with the Legal Department to respond to requests by regulatory authorities to ensure appropriate responses and to avoid inappropriate disclosure of attorney-client privileged materials, trade secret



information or other nonpublic information. This policy should not be construed as an effort to prevent an employee from disclosing information to a government or law enforcement agency where the employee has reasonable cause to believe that the information discloses a violation of, or noncompliance with, a state or federal statute or regulation but, rather, is intended to protect A10's confidential information as permitted by law.

## Improper Payments to Government Officials

The U.S. Foreign Corrupt Practices Act as well as other U.S. and the laws and regulations of many other countries prohibit the corruption/bribery of public officials and bribery of private individuals. A bribe is any offer, promise, authorization, or payment of anything of value, made to an individual to induce that individual in any way, such as to misuse their official position, to violate an expectation that the individual will act impartially in good faith or in accordance with a position of trust, to obtain or retain business, direct business to another person, or secure any advantage. Bribes can be virtually anything and are not limited to money but may include favors, jobs for family members, charitable gifts, entertainment and gifts no matter what the value. There is no minimum value for a violation to occur. Inducements that constitute forbidden bribes can occur in the public or private sector. Any and all gifts or entertainment expenses to anyone must be legitimate, reasonable in value (not lavish or excessive), provided openly and transparently, and comply with local anti-corruption

and anti-bribery laws. This policy extends to indirect gifts made through agents and includes the use of personal funds. Employees and directors must obtain pre-approval from the Legal Department before providing anything of value to a government official or employee. Said another way, you may not offer any payment, benefit, favor, or business amenity to a public official or a government employee, even if it has a nominal value or no value at all, unless you have obtained prior approval from the Legal Department for the expense. You should also be aware that what may be permissible in dealings with commercial businesses may be deemed illegal and possibly criminal in dealings with the government. Contact the Legal Department for guidance if/as need be.

For clarity, you are reminded that no matter who or where you are, you are responsible for fully complying with the Foreign Corrupt Practices Act, a law that makes it illegal to offer, pay, promise to pay or authorize to pay any money, gift or other item of value to any foreign official, political party or candidate to assist the Company or another to obtain or retain business. You are advised that the Foreign Corrupt Practices Act forbids doing indirectly, such as through an agent, reseller, or consultant, what it would be illegal to do directly; thus, do not enable, permit, condone or in any way "turn a blind eye" to conduct by a reseller, consultant, or other third party with that would not be permitted by someone employed by A10. All managers and supervisory personnel are expected to monitor continued compliance with the Foreign Corrupt Practices Act. If you have questions or concerns about the Foreign Corrupt Practices Act, please contact the Legal Department.

## Political Contributions

The Company reserves the right to communicate its position on important issues to elected representatives and other government officials. It is the Company's policy to comply fully with all local, state, federal, foreign and other applicable laws, rules and regulations regarding political contributions. The Company's assets—including Company funds, employees' work time and Company premises and equipment—must not be used for, or be contributed to, political campaigns or political activities under any circumstances without the Legal Department's prior written approval.

## Lobbying

You must obtain approval from the Legal Department for any work activity that requires lobbying communication with any member or employee of a legislative body or with any government official or employee in the formulation of legislation. Work activity covered by this policy includes meetings with legislators or members of their staffs or with senior executive branch officials on behalf of A10. Preparation, research and other background activities that are done in support of such lobbying communication are also covered by this policy even if the communication ultimately is not made.

## Trade Restrictions and Anti-money Laundering Compliance

A number of countries maintain controls on the destinations to which products or software may be exported. Some of the strictest export controls are maintained by the United States against countries that the U.S. government considers unfriendly or as supporting international terrorism. A10 requires compliance with all relevant import and other trade compliance laws. These laws and regulations are complex and apply both to deemed exports from the United States and to deemed exports of products from other countries when those products contain U.S. origin components or technology. For example, software created in the United States is subject to these regulations even if duplicated and packaged abroad. In some circumstances, an oral presentation containing technical data made to foreign nationals in the United States or access by foreign nationals to certain technology may constitute a controlled export. The Legal Department can provide you with guidance on which countries are prohibited destinations for company products or whether a proposed technical presentation or the provision of controlled technology to foreign nationals may require a U.S. government license.

In addition, A10 strictly prohibits any conduct or activities that could be construed as money laundering. "Money laundering" is the concealment of true origin and ownership of money obtained from their criminal activities by passing them through legitimate businesses. To avoid claims or issues associated with the legitimacy of funds the company will only conduct business with reputable clients

and third parties engaged in legitimate business activities who have funds derived from legitimate sources. If you have any questions or concerns about the legitimacy of funds or sources of funds for any financial arrangements or transactions affecting our business, you should immediately obtain guidance from the Finance Department.

## Immigration Laws

The United States and other countries impose restrictions on non-citizens visiting or working in the country. In many instances visas or work permits must be obtained from the government. You are responsible for complying with all applicable immigration laws. If you have any uncertainty concerning the requirements of the law, you should consult with the Legal Department before working in, or travelling to, a country of which you are not a citizen, or authorizing any person to do so.

If you have any uncertainty concerning the requirements of the law, you should consult with the A10 Networks Legal Department.



## Procedural Matters

Codes of conduct cannot replace the thoughtful and prudent behavior of an ethical employee or director or provide definitive answers to every question that may come up in the course of the Company's business. This said, we believe this Code will be helpful to A10's employees as well as any and all persons, companies, etc. who do business with it and enable them to engage in positive conduct as and when novel situations present themselves. Employees and directors are encouraged to and may always seek guidance from and direct questions to supervisors, managers or the Legal Department when in doubt about the best course of action to take in a particular situation.

## Distribution

All employees will receive a copy of this Code at the time they join the Company and will receive periodic updates. Agents and contractors should also be provided with a copy of this Code.

## Acknowledgment

All new employees must sign an acknowledgment form confirming that they have read this Code and that they understand and agree to comply with its provisions. Signed acknowledgment forms will be kept in your personnel file. Failure to read this Code or to sign an acknowledgement form does not excuse any person from the terms of this Code.

## Approvals and Waivers

Except as otherwise provided in this Code, the Board or its designated committee must review and approve any matters requiring special permission under this Code for a member of the Board or an executive officer. Except as otherwise provided in this Code, the CFO and the General Counsel must review and approve any matters requiring special permission under this Code for any other employee, agent or contractor.

Any waiver of any provision of this Code for a member of the Board or an executive officer must be approved in writing by the Board or its designated committee and promptly disclosed, along with the reasons for the waiver, to the extent required by law or regulation. Any waiver of any provision of this Code with respect to any other employee, agent or contractor must be approved in writing by the CFO and the General Counsel.

Copies of approvals and waivers will be retained by the Company.

## Reporting violations

You should promptly report violations or suspected violations of this Code to the General Counsel. If you wish to remain anonymous, send an anonymous letter addressed to the General Counsel at A10 Networks, Inc., 2300 Orchard Parkway, San Jose, CA 95131, or if you would prefer to place an anonymous report, you may use our third-party hotline provider either telephonically at 1.855.224.8217, or web intake at [A10networks.ethicspoint.com](https://a10networks.ethicspoint.com).

If your concerns relate to accounting, internal controls or auditing matters, or if the General Counsel or another executive officer is implicated in any violation or suspected violation, you may also contact the Audit Committee of the Board, or if you would prefer to place an anonymous report, you may use our third-party hotline provider either telephonically at 1.855.224.8217, or web intake at [A10networks.ethicspoint.com](https://a10networks.ethicspoint.com).

If you make an anonymous report, please provide as much detail as possible, including copies of any documents that you believe may be relevant to the issue.

When reports are not made anonymously, reasonable efforts will be made to keep your identity confidential. In certain circumstances, however, your identity may become apparent during an investigation or may need to be disclosed (e.g., in regulatory proceedings). Accordingly, it is not possible for the Company to give a blanket guarantee of confidentiality.

Reprisals, threats, retribution or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this Code or other Company policies, or against any person who is assisting in any investigation or process with respect to such a violation, are strictly prohibited.



## Investigations

The Board or its designated committee will be responsible for investigating violations and determining appropriate disciplinary action for matters involving members of the Board or executive officers. The Board or its designated committee may designate others to conduct or manage investigations on its behalf and recommend disciplinary action.

Subject to the general authority of the Board to administer this Code, the CFO and the General Counsel will be jointly responsible for investigating violations and determining appropriate disciplinary action for other employees and contractors. The CFO and the General Counsel may designate others to conduct or manage investigations on their behalf and recommend disciplinary action. The CFO and the General Counsel will periodically report Code violations and the corrective actions taken to the Board or its designated committee. The Board reserves the right to investigate violations and determine appropriate disciplinary action on its own and to designate others to do so in place of, or in addition to, the CFO and the General Counsel.

The Company will promptly investigate any suspected violations. If it is determined that evidence of a violation exists, the individual subject to investigation will be notified. The subject of an investigation will have an opportunity to respond to any allegations made against that person. A person suspected of violating this Code may be suspended with or without pay while an investigation is conducted. The Company will follow local grievance procedures in jurisdictions where such procedures apply.

## Disciplinary action

The Company will take appropriate action against any employee, agent or contractor whose actions are found to violate this Code. Disciplinary actions may include, at the Company's sole discretion, oral or written reprimand, suspension or immediate termination of employment or business relationship, or any other disciplinary action or combination of disciplinary actions as deemed appropriate to the circumstances. A record of the disciplinary action will be retained in the employee's personnel file.

In determining what disciplinary action is appropriate in a particular case, the Company will take into account all relevant information, including the nature and severity of the violation, any history of warnings and violations, whether the violation appears to have been intentional or inadvertent and whether the violator reported his or her own misconduct. The Company will strive to enforce this Code in a consistent manner while accounting for all relevant information. An alleged violator may make a written request for reconsideration within 14 days of notification of the final disciplinary decision.

Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Certain violations of this Code may also be subject to civil or criminal prosecution by governmental authorities and others. Where laws have been violated, the Company will report violators to the appropriate authorities.

## Amendment, Modification and Waiver

This Code may be amended or modified by the Company's Board of Directors or a committee of the Board of Directors in their discretion. Except for conflict of interest transactions that are required to be disclosed pursuant to Item 404 of Regulation S-K promulgated under the Securities Act of 1933, any amendment or waiver of this Code of Conduct for a director, executive officer or any financial or accounting officer at the level of the principal accounting officer or controller or above, may be made only by the Board of Directors, and must be promptly disclosed to stockholders if and as required by applicable law or the rules of the share exchange on which the Company's shares are traded. Waivers with respect to other employees or applicable contractors may be made only by the Company's Chief Executive Officer, Chief Financial Officer or General Counsel, or his or her designee(s), as applicable. Conflict of Interest waivers and approvals with respect to other employees or applicable contractors may be made in accordance with the approval guidelines set forth in this Code, as approved by the General Counsel. Any waiver of this Code of Conduct with respect to a conflict-of-interest transaction required to be disclosed pursuant to Item 404 of Regulation S-K promulgated under the Securities Act of 1933 must be approved or ratified by the Audit Committee in accordance with the Company's Policy and Procedures with Respect to Related Person Transactions.

## Supplement to the Code of Ethics for CEO and Senior Financial Officers

In addition to being bound by all other provisions of this Code, the Company's Chief Executive Officer ("CEO") and financial officers with the title of "Director" or above (including the Chief Financial Officer, the Principal Accounting Officer, the Corporate Controller and all employees holding a Vice President title in the Company's finance department) ("SFOs") are subject to the following additional specific policies:

1. The CEO and SFO are responsible for and will ensure understandable, fair, accurate, complete and timely disclosures in: (i) the periodic reports filed by the Company with the SEC and other regulatory bodies; and (ii) other public communications relating to the Company's finances made by the Company. The CEO and each SFO must promptly to bring any material information of which he or she may become aware that adversely affects the disclosures made by the Company in its public filings to the Company's Audit Committee and generally assist the Audit Committee in fulfilling its responsibilities.
2. The CEO and each SFO shall promptly bring any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have

a significant role in the Company's financial reporting, disclosures or internal controls, to the Audit Committee.

3. The CEO and each SFO shall promptly bring material information she or he may have concerning violations of this Code, including but not limited to any actual or apparent conflicts of interest between personal and professional relationships involving employees who have a significant role in the Company's financial reporting, disclosures or internal controls to the attention of the Audit Committee and the General Counsel, Legal Department or CEO. The CEO and each SFO shall avoid actual or apparent conflicts of interest between personal and business relationships, such as holding a substantial equity, debt, or other financial interest in any competitor, supplier or customer of the Company, or having a personal financial interest in any transaction involving the purchase or sale by the Company of any products, materials, equipment, services or property, other than through Company-sponsored programs. Any such actual or apparent conflicts of interest shall be brought to the attention of the General Counsel, Legal Department or the CEO.
4. The CEO and each SFO shall promptly bring any information such officer may have concerning evidence of a material violation of the securities or other laws, rules or regulations applicable to the Company and the operation of its business, by the Company or any agent thereof, to the attention of the General Counsel, Legal Department or CEO and to the Audit Committee. The CEO and SFOs shall act with honesty and integrity in the performance of his or her duties at the Company, shall comply

with laws, rules and regulations of federal, state and local governments and other private and public regulatory agencies that affect the conduct of the Company's business and the Company's financial reporting.

5. The Board of Directors shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of this Code or of these additional procedures by the CEO and the Company's SFOs. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code (in letter and in spirit) and these additional procedures and may include appropriate disciplinary or other remedial measures with appropriate notice to the individual involved. In determining what action is appropriate in a particular case, the Board of Directors or such designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation occurred once or repeatedly, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past.

## Additional Information

Nothing in this Code of Business Conduct and Ethics creates or implies an employment contract or term of employment. Employment at the Company is employment at-will. Employment at-will may be terminated with or without cause and with or without notice at any time by the employee or the Company. Nothing in this Code shall limit the right to terminate employment at-will. No employee of the Company has any authority to enter into any agreement for employment for a specified period of time or to make any agreement or representation contrary to the Company's policy of employment at-will. Only the CEO of the Company has the authority to make any such agreement, which must be in writing.

The policies in this Code do not constitute a complete list of Company policies or a complete list of the types of conduct that can result in discipline, up to and including discharge.



[A10networks.ethicspoint.com](https://a10networks.ethicspoint.com)



## Learn More

About A10 Networks

Contact Us

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