

Worldwide Code of Business Conduct and Ethics

As amended, March 2015

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A Note From Rami Rahim

Dear Team Juniper,

I am proud to be a part of an organization that acts with the highest standards of business and professional conduct—both internally and with those around us, including our customers, partners, and suppliers. We can execute on our strategy and achieve our goals only by working as One Juniper and living by our Juniper values, which includes the Juniper Way and complying with policies and applicable laws and operating with integrity and high business ethics.

This Worldwide Code of Business Conduct and Ethics (the “Code”) is an extension of Juniper’s values and contains many of our guidelines and rules for business conduct that apply to the entire Juniper team.

I hope that you will use the Code on a frequent basis as a source of information and as a guide to help you make good decisions. If you have questions or concerns, please look to the Code for resources and colleagues who can help you. Because there are many laws and policies that apply to us, as employees of a global company, this updated version of the Code provides links to multiple Juniper policies that you should be familiar with and follow.



I expect that every employee, officer and director of Juniper will comply with the Code. Please know that violations can result in great harm to Juniper and can also result in disciplinary action up to and including termination as well as personal liability for you.

If you have a concern to report, please see the Code and/or the [Reporting Ethics Concerns Policy](#), which both provide information regarding how to report a concern. And please be aware that Juniper has a [policy](#) against retaliation for making such reports.

As always, please feel free to contact me with any questions, comments or suggestions.

A handwritten signature in black ink, appearing to read "Rami Rahim".

Rami Rahim

Chief Executive Officer

1. The Code Applies to You

Juniper’s employees, officers and directors are expected to read, understand and comply with this Code. Juniper may have other applicable policies that in some cases are more specific than the provisions contained in this Code. Each employee, officer and director is expected to read, understand and comply with those additional applicable policies.

Note that Juniper managers have certain additional responsibilities, including leading by example, promoting a positive ethical environment and encouraging open communication.

See Using the Code for details on other key Juniper policies

Q. Does the Code apply to me if I am outside of the United States?

A. Yes. The Code applies regardless of location. If you have questions about local laws or customs being different than the Code, please contact Legal.

This Code applies to your employment at Juniper. Please keep in mind that there are situations that may arise (for example, on Juniper business travel during free evenings), in which there is an expectation that you will still act in accordance with this Code and the Juniper Way and also not violate laws or other regulations even if you are outside of regular working hours or Juniper facilities.

2. Purpose of the Code

The Code is intended to discourage wrongdoing and to promote:

- Honest and ethical conduct, including actual or apparent conflicts of interest;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that Juniper files with or submits to government agencies and also in other public communications made by Juniper;
- Compliance with applicable governmental laws, rules and regulations;
- Prompt internal reporting of violations of the Code; and
- Accountability for adherence to the Code.

The Code does not create an employment contract. It does not create any contractual rights between Juniper and its employees or any express or implied promise for specific treatment in specific situations. Your employment relationship with Juniper can be terminated at any time for any reason with or without cause unless otherwise required by local laws outside the United States.

3. Using the Code

You should use the Code and other applicable Juniper policies as reference guides. The Code is not intended to address every issue or situation you may face as a Juniper employee. Please refer to the links within the Code to several other Juniper policies. Various Juniper department intranet sites (such as HR, Legal and IT) also house Juniper policies.

[The Juniper Way](#) reflects our core values. You should always ask yourself if your actions or activities are consistent with these values.

- **Be Authentic**
- **Build Trust**
- **Deliver Excellence**
- **Pursue Bold Aspirations**
- **Make a Meaningful Difference**

Juniper strives to comply with the law, Juniper policy and the Juniper Way. When you are in doubt about whether to take an action or engage in an activity, ask yourself these questions:

1. Does it violate the law?
2. Does it violate Juniper policy?
3. Would I be concerned if the action or activity appeared in a news headline or in a court of law?

If the answer to any of these questions is "yes," don't proceed. Seek guidance from your manager, HR or Legal with questions.

4. Quarterly and Annual Certifications

Annual Code Certification.

You must certify on an annual basis that you agree to comply with the Code. You will receive an email instructing you how to complete your certification.

Quarterly Compliance Certifications.

Depending on what your job is at Juniper, you may be asked on a quarterly basis to certify your knowledge of various facts. Juniper relies on certifications to record transactions, make legal and accounting determinations and to comply with the law.

You must take these certifications very seriously and answer them carefully. Any failure to provide requested certifications or to fully, completely, honestly and accurately complete a requested certification is a violation of the Code. This will result in disciplinary action, which may include termination of your employment.

If you have any questions about certifications, please contact Legal.

5. Ethics Helpline and Reporting Concerns

We want the highest ethical standards at Juniper. We are committed to maintaining a workplace in which employees can report an ethical concern and do so free of any harassment, discrimination or retaliation. If you discover an event of a questionable, fraudulent or illegal nature that is, or may be, in violation of this Code, you should report it immediately.

Please refer to Juniper's [Reporting Ethics Concerns Policy](#) for more detail on reporting concerns.

How to Report a Concern

Our Reporting Ethics Concerns Policy lists the various ways in which you may report a concern (including any concern about retaliation).

- talking with your manager;
- talking with Human Resources;
- talking with the Legal Department;
- sending an email to ethicshelpline@juniper.net;
- calling a member of the Concerns Committee;
- calling the Ethics Helpline. **This option allows you to remain anonymous if you wish.** The phone number and instructions for using the Ethics Helpline can be found in Juniper's Reporting Ethics Concerns Policy.
- calling the Chairman of Juniper's Audit Committee.

Investigation of Reported Concerns.

All concerns reported will be taken seriously and will be promptly investigated. The specific course of an investigation of any reported concern depends on the nature of the reported concern and the quality of the information provided.

As part of investigating a concern, it may be necessary to ask you to participate in the investigation. You have a duty to cooperate in the investigation of any reported concern. See Cooperation with Investigations.

Juniper Value: Be Authentic - Speak up

At the conclusion of an investigation, if it is determined that a violation of the Code or other Juniper policy has occurred, we will take prompt remedial action equal with the severity of the offense. This action may include disciplinary action for appropriate people, up to and including termination.

No Discrimination, Retaliation or Harassment.

JUNIPER STRICTLY PROHIBITS ANY DISCRIMINATION, RETALIATION OR HARASSMENT AGAINST ANY PERSON WHO REPORTS A CONCERN OR WHO PARTCIPATES IN ANY INVESTIGATION OF A CONCERN. Any complaint that discrimination, retaliation or harassment has occurred will be promptly and thoroughly investigated. If it is found that there actually was discrimination, retaliation or harassment, then appropriate disciplinary action will be taken, up to and including termination.

Q. Barbara, a Juniper engineer, has a complaint about her own manager. She is afraid that if she complains, her manager might be angry with her.

A. Juniper prohibits any retaliation for reporting a concern. Anyone found to be retaliating against an employee for reporting a concern is subject to discipline. In other words, you need to speak up!

6. Bribery and Anti-Corruption

Juniper doesn't want bribery or corruption in any of our business practices. No potential benefit can justify hurting our integrity and reputation or the trust others place in us. All bribery is strictly prohibited.

All employees must fully comply with the Foreign Corrupt Practices Act (FCPA) and other applicable laws prohibiting the bribing of public officials or individuals in the private sector (such

as the U.K. Bribery Act of 2010 and the Brazil Clean Companies Act of 2014). All transactions, including expense reimbursement, must be accurate and true and not disguise the real purpose of any discount, expense, etc.

Even though the FCPA is a U.S. law, it applies to us everywhere.

These laws and Juniper's [Anti-Corruption Policy](#) prohibit making, giving or promising to give, anything of value to "public officials" or private individuals in order to obtain or retain business or to gain an improper advantage. We can't do these things directly or indirectly through a partner or other third party.

Q: Ben knows we can't give bribes, but wants to know if it's ok if our partner is giving bribes.

A: No, if we know a partner is doing something wrong or we have directed them to do so on our behalf, this is still a violation.

Companies with Government-Related Owners.

The term "public officials" includes not just traditionally elected or appointed government officials, but also all employees and representatives of state-owned or operated businesses and organizations, such as universities and hospitals, as well as political officials and political candidates. We need to be especially cautious in our dealings with third parties that have government or "public" officials or government employees as a significant owner. If you have any questions about dealing with these types of entities, please contact your local Legal Department resource.

Please note that a company may be considered to be owned or controlled by the government even if it is only 30% government owned, for example.

Third Party Gifts, Travel and Entertainment. The issue of potential corruption often comes up when travel, gifts and entertainment are being given to a third party. A "third party" means anyone other than a Juniper employee, officer or director. Juniper has strict guidelines on this topic that can be found in Juniper's [Anti-Corruption Policy](#). ALL REQUESTS FOR THIRD PARTY TRAVEL MUST BE SUBMITTED FOR PROPER PRE-APPROVAL THROUGH THE [GIFTS, TRAVEL AND ENTERTAINMENT PRE-APPROVAL TOOL \("GTE tool"\)](#)

Third party gifts and entertainment must be submitted for approval in advance unless the cost is reasonable, legal and below the guidelines in the Anti-Corruption Policy. Please see the policy above or contact Compliance-Team@Juniper.net with any questions.

Q: Jerry has set up a government customer visit in the EBC for the day. While the customer is visiting, Jerry also plans to take the customer and his family on a few days of sightseeing for. Is this permitted?

A: No, a few days of sightseeing following a one day business trip would be excessive.

Q. What if in my country, giving small bribes is customary?

A. No, bribes are illegal and regardless of local customs, you must follow Juniper policies and the law.

Charitable Gifts.

We need to ensure that any donations that Juniper makes are not being given for improper reasons or in violation of anti-corruption regulations. For that reason, all charitable donations that Juniper is requested to make by a customer or other third party must be submitted to the GTE Tool for pre-approval. Also, any charitable event that Juniper is requested to sponsor or participate in by a customer or third party must be submitted to the GTE Tool for pre-approval.

Political Contributions.

Contributions by companies to politicians, political parties, political action committees or other political organizations are highly regulated and often illegal. For this reason, Juniper generally does not permit political donations by, through, or on behalf of, Juniper, and all political contributions by Juniper in any form must be requested through the GTE Tool and be approved in advance in writing by the Legal Department. This includes paid attendance at events to raise funds for politicians or political activities. It also includes non-money contributions, such as lending Juniper assets, making Juniper facilities available for event space or contributing the time of employees to assist in political activities. You are encouraged to exercise your political rights on your own time and with your own resources if it is clear that you are not doing this in connection with Juniper or with Juniper's endorsement. Remember that if Juniper reimburses an employee's (or anyone else's) political contributions or expenses, it is treated the same as a contribution made directly by Juniper and must be approved in advance by using the GTE tool.

Q: If I make a political contribution, can I then submit it for reimbursement?

A: Only after obtaining pre-approval as stated above. Keep in mind that any political contributions or expenses Juniper reimburses to an employee (or anyone else) are considered the same as a contribution made directly by Juniper and so will be under scrutiny.

Discounts

Be aware of giving excessive discounts to partners or third parties that may be used as bribes or for other improper purposes. All documents requesting discounts must accurately reflect the purpose or character of the discounts. In addition, our books, records and documents must accurately reflect the underlying transactions. For example, "marketing" or other funds must be clearly defined and accurately captured in our books and records.

Q: Bob thinks he can grow revenue faster if he had a budget for marketing and travel, but his requests for budget have been denied. He wants to give a partner some extra discount on a transaction that the partner will use to set aside a marketing fund that Bob will help direct. Is this ok?

A: No. Discounts should be used to arrive at the correct price for our products and services. Creating a marketing fund in this manner likely violates Juniper policy and the FCPA because the funds are not accurately and fully reflected in the Company's books, records and transaction documentation.

ALL FORMS AND POLICIES RELATED TO FCPA, ANTI-CORRUPTION AND GIFTS, TRAVEL AND ENTERTAINMENT FOR THIRD PARTIES CAN BE FOUND AT JUNIPER'S LEGAL/COMPLIANCE INTRANET SITE.

7. Conflicts of Interest

As a Juniper employee, you must act within guidelines that prohibit actual and potential conflicts of interest in your job. Examples of conflicts of interest are accepting outside employment with or without compensation from a Juniper customer, supplier, or competitor; using your position for personal gain for yourself, a family member or a close personal friend; or serving on technical advisory boards. Be aware that even the perception of a conflict of interest could create a problem for you, Juniper, or any third parties involved.

You must disclose the possibility of any actual or potential conflict of interest as soon as possible so that safeguards can be established to protect you, Juniper and any third parties involved. If you are unsure whether a conflict exists, please seek further clarification by contacting HR or Legal.

Juniper Value: Build Trust

Outside Employment

As a Juniper employee, you may not engage in any additional employment that would interfere with your job performance or responsibilities. **You must disclose promptly to your manager, HR or Legal any potential employment conflict.**

Outside Advisory or Board Service

You must obtain approval for participation with another entity or for certain business activities that may present an actual or potential conflict of interest with your Juniper employment. Technical advisory boards, appointments to industry groups, or Board of Director positions may present conflicts of interest. The appropriate forms for requesting approval are available at the [Legal-Compliance intranet site](#). Any compensation you receive must be commensurate to your responsibilities. You must obtain approval before accepting such a position.

For further information, see the [Conflict of Interest Process Flowchart](#)

Members of Juniper's Board of Directors must notify Juniper's General Counsel either in advance or promptly after accepting a new directorship position.

Business Interests

If you or a relative (see "Related Parties," below for a description of what "relative" includes) are considering investing in a Juniper customer, supplier, developer or competitor, you must first take great care to ensure that these investments do not compromise your Juniper responsibilities. Many factors should be considered in determining whether a conflict exists. Things to consider are the size and nature of the investment; your ability to influence Juniper's decisions; your access to Juniper's confidential information; your access to the other company's confidential information; and the nature of the relationship between Juniper

and the other company. Always consult with Legal before making any such investment and always disclose potential conflicts to your manager.

Business with Related Parties

You should avoid conducting any Juniper business with a relative or significant other, or with a business in which a relative or significant other is associated in any significant role. Relatives include spouse, sister, brother, daughter, son, mother, father, grandparents, aunts, uncles, nieces, nephews, cousins, step relationships and in-laws. Significant others include persons living in a spousal (including same sex) or familial fashion with an employee or with whom the employee has a business or investment relationship outside Juniper.

A potential conflict of interest can arise when an employee directs business from a family member to Juniper. An example would be if your spouse owns a printing company, and Juniper needs materials printed. In order to prevent a potential conflict of interest and be completely impartial, employees directing business to Juniper should discuss the situation with their manager and remove themselves from the decision making process. If you are unsure if a potential or actual conflict of interest exists, please contact the Legal Department.

If a related party transaction appears to be unavoidable, you must fully disclose the nature of the related party transaction to Juniper's General Counsel or Chief Financial Officer and obtain approval before engagement in the transaction. Also disclose potential related party transactions to your manager.

Giving Gifts and Gratuities

Sometimes we may want to give a gift to a supplier or partner. Please refer to the Bribery and Anti-Corruption section of this Code. Inexpensive gifts, infrequent business meals, celebratory events and entertainment do not violate this policy so long as they are not excessive or appear improper, and they follow the guidelines provided in Juniper's Anti-Corruption Policy. When required, pre-approval must also be obtained through the GTE tool. Please note that special care must be taken when considering giving gifts to government or "public" officials to ensure they do not violate the law or our policies, and you should contact Legal if you are considering doing this. Please see also Juniper's [U.S. Public Sector Procurement Policy](#) on this topic.

When you are in a situation that you think might present a conflict of interest, ask yourself if you are doing the right thing for Juniper and if the situation would embarrass you or Juniper if it were made public. If you have questions, contact Legal or the Ethics Helpline.

Note that it is not permissible to lower the value of a gift by absorbing part of the cost yourself. For example, it is not acceptable to submit an expense reimbursement for a \$50 basket of fruit to give to a customer when the basket actually cost \$400, and you are paying the \$350 difference.

Receiving Gifts and Gratuities

Sometimes you may be offered a gift, travel or other compensation by a third party in connection with your work.

If you are asked to attend a conference or speaking engagement, it is ok to accept hotel/flight reimbursement if your manager approves, but you should not accept any other compensation for doing the speaking engagement.

If you receive a gift \$100 or less in value, it is ok to accept the gift (unless your department has established a lower value limit). For gifts given to a group of people at Juniper (a holiday basket given to your team, for example), it is fine to accept the gift it is worth \$200 or less. Approval by Legal is required for a gift intended for an individual or group that has a higher value than these values.

With respect to a sporting or other event, if the ticket price would exceed US \$200, you need to get approval from Legal. A set of tickets intended for a group and worth more than US \$600 requires Legal approval. For tickets to events received internationally, please contact your local Legal Department representative for approval to accept the tickets.

Note that the gift values referenced in this section serve as the maximum annual value of gifts from the same person or entity. In other words, you may not accept five gifts each valued at \$100 from the same customer in a one year period. Likewise, the value of a group gift from the same person or company is limited to \$200 in a one year period.

Contact Legal with other concerns around this issue. See also Communicating With Others.

Q. What does it mean to report an issue to "Legal"?

A: Any of Juniper's internal Legal department attorneys can help you with an issue.

Finders Fee, Monetary Incentives and Commissions

Finder's fees, monetary incentives or commissions paid to you by others are prohibited unless they are part of a program approved by Juniper.

When Juniper does business with companies and earns rebates, refunds or other incentives, the amounts earned belong to Juniper. Individuals can only use incentives for their personal benefit when Juniper policies specifically permit doing so. For example, our travel policies permit employees to participate in airline frequent flier programs.

Corporate Opportunities

You may not take advantage for your own personal gain of any opportunities discovered through Juniper property, information or your position unless the opportunity is disclosed fully in writing to Juniper's General Counsel, and the CEO, CFO or Board of Directors declines to pursue such opportunity (or, in the case of an officer, if the Board declines). These opportunities include product and service invention or developing, authoring books, etc.

Being in a personal relationship with another Juniper employee or contractor can possibly create a conflict of interest if that relationship might affect your judgment or create the appearance of affecting your judgment. For example, if your wife's best

friend is one of your direct reports, you may find it difficult to be impartial when giving feedback or bonuses. If you have questions about any potential conflicts due to a personal relationship, please consult with the General Counsel, Controller or HR.

Special Requirements for Executive Officers and Directors. Any conflict of interest involving a Section 16 officer or member of Board of Directors requires approval by the Audit Committee of the Board of Directors.

8. Trade Compliance

You and Juniper are responsible for complying with U.S. and any other applicable laws and regulations that control the import, use, export and re-export of Juniper products and software, the transfer of technical data or the provision of technical services.

Juniper's Trade Compliance Group has set up import and export compliance policies and procedures that all employees must follow. These processes dictate how we ship product, deliver software, disclose technical data or provide technical assistance.

Trade compliance laws and regulations are complex. When in doubt, contact compliance_helpdesk@juniper.net. If you have reason to believe a particular transaction, shipment or disclosure violates any such laws or regulations or applicable Juniper compliance processes or procedures, please contact Juniper's Trade Compliance group in Legal.

Juniper is prohibited from supporting any product - whether under warranty, SVC contract or PAR contract - if there is reason to believe that the product has been exported or re-exported to an embargoed country - REGARDLESS of whether Juniper actually participated in the unlawful export or re-export.

For more details on this topic, go to <http://www-int.juniper.net/legal/itc/index.html>

9. Intellectual Property (Confidential Information, Open Source, Third Party IP, etc.)

Juniper's Confidential Information. Juniper's confidential information has tremendous value, and every employee has a duty to safeguard it. This responsibility extends to confidential information of third parties that we have received under nondisclosure agreements ("NDAs"), as well as the information of our customers and their customers that we receive in connection with our business and services with them.

All confidential information must be used only for Juniper business purposes. If you improperly use or disclose trade secrets or confidential business information, you will be subject to disciplinary action, up to and including termination of employment and legal action, even if you do not actually benefit from the disclosed information.

For practical tips, policy guidance and industry news about information security issues critical to Juniper's business, visit <http://www-int.juniper.net/it/security/awareness/>. If you have questions, concerns or comments, please see [Information Security Policy](#) or contact Security-Awareness@juniper.net.

Ten actions we can each take to make Juniper confidential information more secure:

- Don't get "phished"
- If you don't trust or own it, don't download it
- Lock your mobile devices
- Use extra caution while traveling and working in public places
- Be smart about what you say or publish about Juniper
- If it's confidential, label it confidential
- Limit access to those with a genuine need to know
- Share confidential information with others only under a NDA
- What we get from others, we must protect as if it were our own
- If in doubt, ask for help

Disclosing Juniper's Confidential Information

Sometimes, we need to disclose Juniper confidential information for certain business needs, such as forming a relationship with another company. If you and your manager and other appropriate Juniper management determine that Juniper confidential information should be disclosed, a nondisclosure agreement must be signed before the disclosure takes place. Never sign another company's nondisclosure agreement or accept changes to Juniper's standard nondisclosure agreements without review and approval by Legal.

Legal has standard nondisclosure agreements for most types of disclosures. See the [NDA tab](#) under Legal on the intranet for more information.

Requests by Regulatory Authorities

Juniper must cooperate with government inquiries and investigations. If you receive a request for information, documents or interviews, please contact Legal immediately and do not destroy any information that is requested or relevant to the request.

Handling the Confidential Information of Others

We need to take special care to responsibly handle the confidential information of others.

- Appropriate Nondisclosure Agreements. Juniper requires a nondisclosure agreement be in place before we accept any confidential information from a third party. Contact Legal for assistance with putting a nondisclosure agreement into place.
- Need to Know. Once a third party has disclosed confidential information to Juniper, we have an obligation to comply with the nondisclosure agreement and limit use of the confidential information to the specific purpose for which it was intended. You may only disclose confidential information to other Juniper employees who have a need to know the information.
- Notes and Reports. Sometimes when we review confidential information of a third party under a nondisclosure agreement, we will take notes or prepare reports. These notes or reports containing confidential information summaries should be treated just the same as

the original confidential information: they should be marked as confidential and disclosed only to Juniper employees with a need to know the information.

- Competitive Information. You should never attempt to obtain a competitor's confidential information improperly. Juniper does employ former employees of competitors, and we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers. You should never pressure an employee to provide confidential information of their prior employer.
- Sometimes information of another company is obtained accidentally or is provided to Juniper by unknown sources. In such cases, it may be unethical to use the information, or using such information may be prohibited under certain regulations. You should immediately contact Legal to determine how to proceed.

Q. Nikhil kept some documents from his last two employers that might help him with his new job at Juniper. Is it ok for Nikhil to use these documents at Juniper?

A. If the documents contain any confidential information of Nikhil's prior employers, he cannot use or share the information. If he is unsure, he should consult with Legal before he uses or shares the information.

Other Third Party IP

We also do not want to improperly use other intellectual property of third parties, such as patents, copyrights, trademarks and trade secrets. Contact Legal if you have any concerns.

Open Source

Juniper is committed to open source software development. However, before modifying, using or incorporating open source software into a service, product or product design, you must review and comply with all of Juniper's open source policies and seek guidance from Legal for any use of open source code.

10. Insider Trading

All of Juniper's employees worldwide must comply with United States securities laws. Violation of these securities laws can put both you and Juniper at risk.

Insider Trading

In the normal course of business, you may come into possession of significant, sensitive material information about Juniper. Juniper and U.S. security laws prohibit you from trading in Juniper securities or tipping other people to trade when you know material non-public information about Juniper. This is true even if your decision to trade is unrelated to the material non-public information. All employees are required to follow Juniper's [Insider Trading Policy](#).

Q. What is material non-public information?

A. It is information that has not been released to the public and something that would be important to a reasonable investor who is deciding whether to buy, sell or hold securities. Here are some examples. Note that this is not a complete list:

Financial information

“Operating” developments (for example, new product developments, changes in business operations or extraordinary management developments, large increases or decreases in orders).

Proposed business activities (for example, proposed or agreed mergers, acquisitions, divestitures, major investments, restructurings).

NOTE: You should be aware that stock market surveillance techniques are becoming increasingly sophisticated. Insider trading rules are strictly enforced, even in instances when the financial transactions seem small.

Q. Do these rules only apply to stock I got under a Juniper incentive program?

A. No. These rules apply to any Juniper securities (stock, options and debt) including ones you bought on the open market.

Trading Blackout Periods. As stated in Juniper’s Insider Trading Policy, Juniper may block you from trading Juniper securities (“black out”) at any time. Certain employees will be blacked out on a regular schedule. This may also happen when a potential transaction or event would likely result in people possessing material non-public information. Juniper will notify you if you are blacked out. For more details, please review Juniper’s Insider Trading Policy.

Short Sales and “Collar” Transactions. A short sale, as defined in Juniper’s Insider Trading Policy, means any transaction in which you may benefit from a decline in Juniper’s stock price. A “collar” transaction limits the amount of profit you may make from an increase in the stock price and minimizes the amount of loss someone may experience from a decline in Juniper’s stock price. You must comply with guidelines on short sales and collar transactions detailed further in Juniper’s Insider Trading Policy.

Information of Other Companies. You may also come into possession of confidential information of another company with which Juniper has a relationship or is contemplating a relationship. The security laws say that you may not trade in another company’s securities when you know of material non-public information about that company.

11. Financial Matters, Business Practices, Money Laundering and Payment Practices

Accurate books and records

Because Juniper is a public company, we are responsible to our stockholders and the investing public. All of our transactions must be fully, fairly and accurately recorded in Juniper’s books and records in compliance with all applicable laws. Some examples that violate this Code include

- false or misleading entries (including expense reports, work time reports, reimbursement requests, and discount request forms)
- unrecorded funds or assets
- payments without appropriate supporting documentation and approval

- intentionally circumventing internal controls
- intentionally interfering with an external or internal audit

Expense report documentation must fully and accurately describe the nature of the expense and be processed in a timely manner. For example, adult entertainment is not reimbursable under Juniper policies. You cannot falsely characterize this as a business meal.

Red Flags

- Off-the-books funds or deals
- Backdated contracts or other documents
- Keeping a list outside our official financial records of amounts or discounts Juniper owes to another business or that another business owes to Juniper
- Transactions designed to hide the real underlying economics or purposes (such as falsely stated market development funds which are in reality a bonus or bribe to a partner or customer)

Money Laundering and Third-Party Payments

Money laundering is the process by which individuals or organizations try to conceal illicit funds or make these funds look legitimate. In some cases, parties may use others to make payments to evade paying taxes or avoid currency restrictions or other laws. The following examples may be indications of potential money laundering:

- Attempts to make large payments in cash
- Payments by or to someone who is not a party to the contract
- Requests to pay more than provided for in the contract
- Payments made in currencies other than those specified in the contract
- Payments from an unusual, non-business account

Payments to or from someone who is not the exact party to a contract are subject to our [Third Party Payment Policy](#) and Anti-Money Laundering Policy and require prior approval, except in the case of certain circumstances specified in that policy.

Side Letters and Side Agreements

Juniper policy prohibits the creation of side letters and side agreements, which are agreements, promises or commitments with another entity (likely a customer, partner or supplier) that create contractual obligations or that modify or override the terms of another contract and that have not been made and disclosed under Juniper’s standard processes for entering into contracts. If you want to make or change a contractual obligation, contact Legal. For more detail regarding side letters, please refer to Juniper’s [Revenue Recognition Policy](#).

Side letters or side agreements can be either written or verbal and frequently are in the form of email commitments.

If you are aware of any side agreement or side letter, you need to report it immediately to Legal, the Vice President of Field Finance and Operations (FF&O) or the Controller.

Distributor and Reseller Reports

Juniper's resellers and distributors provide certain reports to Juniper that Juniper uses to report revenue. These reports include point of sale reports, purchase orders, shipping documentation, etc. It is a violation of the Code to falsify any such reports or documentation. Requesting that a distributor or reseller submit inaccurate documentation to Juniper or failing to tell Juniper about an inaccuracy are also Code violations.

12. Using Juniper Assets, Systems and Facilities

Access to Juniper Facilities

Juniper has certain security measures in place to protect the privacy of Juniper-related communications and the security of Juniper's communication equipment, and to protect Juniper assets from theft, misuse and destruction. You are personally responsible for complying with the level of access control that may be in place in the facility where you work and for the systems you use.

Computers and Other Equipment

You must care for any equipment provided by Juniper (such as a laptop) and use it responsibly for Juniper business purposes. There may be times that you want to use Juniper equipment for personal use. Incidental use of the equipment for personal reasons should be kept to a minimum and cannot interfere with Juniper business or violate any law or Juniper policy. If you use any Juniper equipment at a location outside of Juniper's facilities, you need to take precautions to protect the equipment from theft or damage. All Juniper equipment must be fully accessible by Juniper and remains Juniper property. If you bring your own equipment to the office or use your own equipment for Juniper work, you must comply with all applicable policies relating to use of such equipment.

Q. Alex calls his kids every afternoon from his office phone to briefly check on them. Is that a violation of the Code?

A. No, this is an example of acceptable personal use.

Software and Content

All software used by you in your work for Juniper must be appropriately licensed. Any non-licensed software should be removed. It is against Juniper policy to make or use illegal or unauthorized copies of software or other copyrighted material such as commercial motion pictures and video games (without the appropriate payment, if any).

Q. Mary is doing some volunteer work for her child's school. Every once in a while, they need her to make copies of flyers. If she brings her own printer paper, is it okay for her to use Juniper's copiers?

A. No. Mary may not use Juniper resources for her personal volunteer activities. Even if she brings her own paper, she would still be using other Juniper resources (toner, ink, network bandwidth, etc.).

Red Flags:

- Sharing Juniper passwords
- Unsecured Juniper equipment (laptops, for example)
- Lending Juniper equipment to non-Juniper employees
- Providing access to non-Juniper employees without proper credentials
- Using Juniper resources for personal purposes
- Lax enforcement of electronic access controls

Erasing Data

Other than as part of the IT department's regular maintenance processes or Juniper's Document Retention Policy, it is against Juniper policy to use special products designed for wiping, erasing or making unrecoverable any data from storage devices, electronic memory, computers or electronic devices used for Juniper business, regardless of the fact that copies of such data may exist elsewhere.

Privacy

Customers, partners and employees trust us with some of their most important information. It is essential that we treat that information with care. Juniper has implemented policies and procedures that we believe make Juniper compliant with applicable privacy and data protection laws around the world. For information on how we handle personal data of Juniper employees, see Juniper's [Privacy Policy](#). All employees are expected to access employee personal data in accordance with this policy.

For Juniper's external privacy policy that addresses how we use personal data information of customers and third parties, please see [Our Commitment to Privacy](#).

Employees should not have any expectation of privacy with anything you do using Juniper's network, computers, or any other electronic communications device(s) provided by Juniper. Additionally, if any paper documentation is stored at Juniper's facilities, that information is also subject to review by Juniper or another entity that may subpoena that information. To the extent permitted by applicable local law, Juniper retains the right to access any such information at any time, either with or without your knowledge, consent or approval.

13. Retention of Records

The issue of retaining records is a complex one because "documents" or "records" can include email, electronic files, customer records, etc. Juniper has developed a [Document Retention Policy](#) that specifies the minimum amount of time documents need to be retained.

Sometimes due to a legal matter, investigation or audit, Legal may notify you that certain documents need to be on a "legal hold," meaning that documents you have cannot be destroyed, deleted or modified. Legal will follow up with you to review and/or collect the documents. You must comply with any of these requests.

Q. Can Tyler clean up his desk by throwing away the documentation related to a project he has completed?

A. Yes, unless it is required to be preserved under the Document Retention Policy or a legal hold.

If you have reviewed the Document Retention Policy and are still not sure whether it is ok to delete documents, please contact the Legal Department.

14. Antitrust and Competition Laws

We believe in vigorous, fair and legal competition. The antitrust laws (also known as competition laws, consumer protection laws or unfair competition laws in some countries) prohibit business practices that limit competition improperly. Although the spirit of these laws is straightforward, their application to particular situations can be very complex. Please refer to Juniper's [Antitrust Policy](#) for more detail, and always contact Legal with any questions regarding this area.

Agreements with Competitors

Agreements among competitors to fix prices, restrict output, allocate markets or customers, rig bids or violate fair bidding practices, or boycott a supplier or customer are prohibited and generally illegal. In addition, you must never agree with any competitor on the prices that either company will announce or charge their customers, the timing or method of price increases and terms of sale or delivery that either company will offer customers. Sharing competitively sensitive information with a competitor (such as costs, prices, contract terms, inventories, and marketing plans), even if under a non-disclosure agreement, may also be illegal or create the appearance of impropriety.

Agreements are illegal whether the agreement is in writing or verbal or is "formal" or "informal." **Any agreement with competitors must be reviewed with Legal to ensure compliance.**

Anticompetitive Dealings with Customers or Suppliers

Restrictions on the resale of a company's products, such as resale price agreements, exclusive territories and customer restrictions can also be a problem under the laws of most countries. No employee should ever reach agreement with a distributor or reseller concerning the minimum or maximum prices at which they must sell Juniper's products or services, either in writing or verbally, unless Legal has reviewed and approved of the arrangement.

No partner should be granted exclusive rights without the prior review and approval of Legal. Certain provisions of the antitrust laws prohibit companies from charging different prices for like grade and quality of products to like partners.

Avoid participating in any meeting or discussion among two or more partners that involves any of the following topics:

- The prices or pricing practices of any partner (except if it is pursuant to our standard partner program terms);
- Establishing or eliminating the territory or location of any partner;
- Making decisions to take action against another partner

Unlawfully Obtaining Business Intelligence (Industrial Espionage)

You may not steal or unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of anyone including suppliers, customers, business partners or competitors.

Red Flags:

- Using another company's confidential information
- Pressuring or encouraging a Juniper employee or a potential recruit to disclose customer lists, product plans or other confidential information from a previous employer
- Getting ideas about new products, features or services from third parties when the source of the original idea is not fully known
- Obtaining information through any method you wouldn't be comfortable fully disclosing

Fair Sales and Marketing Practices

At Juniper, we want to win, but win fairly. Please keep that in mind and refrain from disparaging our competitors' products and services.

Anti-Boycott Regulations

There are some boycotts in place in various places around the world, and U.S. law makes it illegal to comply with these boycotts. For example, the Arab League Boycott against Israel is illegal for U.S. companies to comply with. If you are aware of boycott language in a contract, or are asked by another customer, supplier or other entity to discuss complying with such a boycott, contact Legal.

15. Communicating with Others

Communication about Juniper, its business and its markets can impact our reputation, violate privacy or violate regulations. For this reason, you must comply with this Code, Juniper's [Corporate Communications Policy](#) and Juniper's Social Media Policy when communicating with people and entities outside of Juniper.

The Press

If the press approaches you for interviews or to provide comments, you must immediately refer these inquiries to Corporate Communications or Investor Relations (or if the inquiry relates to public policy or legislative matters, to the Government Affairs Department).

The Financial Community

As a publicly traded company, Juniper has certain responsibilities regarding the public distribution of information, particularly to the financial community. Except for the CEO, CFO and Investor Relations personnel, if financial analysts or investors contact you, you must contact Investor Relations.

Social Media

As the use of social media becomes more prevalent, we need to be especially careful about how casual conversation may be interpreted. Communications you make could be interpreted as official statements from Juniper if you are commenting on Juniper's reputation or the perception of customers or the public. Always behave professionally and follow our [Social Media Policy](#).

Endorsements and Publications

Sometimes you may be asked by someone outside of Juniper to provide an endorsement of a non-Juniper product or service. You must get approval from Public Relations prior to making any endorsements. Further, if you wish to identify yourself as a Juniper employee in a publication and/or contribute to or create a publication that may relate to your position at Juniper, Juniper's business or market, doing so may be viewed as a Juniper endorsement, which requires you to obtain preapproval from Public Relations.

Public Policy.

Juniper's Government Affairs Department is responsible for establishing and communicating Juniper's positions on public policy and legislative matters. If you want to comment on, or are asked to speak publicly to the media or at an event that may relate to Juniper's position on a public policy or legislative matter, you must obtain pre-approval from Juniper's Government Affairs Department.

Public Speaking

If you are asked to speak publicly to the media or at an event that may relate to your position at Juniper or to Juniper's business or market, you must obtain preapproval from Corporate Communications or Investor Relations. If any media comment or speaking event relates to public policy or legislative matters, you must get preapproval from the Government Affairs Department. If any media comment or speaking event would involve speaking about financial aspects of our business, or financial market professionals or investors are present, you must also get approval from Investor Relations.

Please be aware that you cannot accept any personal compensation for public speaking. However, if the organization asking you to speak offers reimbursement for expenses, you may accept this reimbursement if your manager approves doing so. See also the Conflicts of Interest section of this Code.

For more detail, please refer to Juniper's Corporate Communications Policy and Social Media Policy.

One aspect of the Juniper Way is Build Trust -- that we share agendas and objectives, encouraging feedback and discussion in an open, collaborative and respectful manner. We also act confidently and never arrogantly. This must be reflected in both our internal and external communications.

Think Before You Send

When you are using Juniper assets and sending communications, think about how you say something as well as what you say. What might be funny in person isn't always funny in email. Stay away from harsh or violent words about wanting to beat our competition and other inappropriate or offensive language.

Helpful Tip: Assume your email will be read later by people you did not send it to, and ask yourself whether you would be proud or ashamed of what you wrote.

16. A Place Where People Can Do Their Best Work

At Juniper, we operate around the world, and we seek to understand and include different perspectives, always acting respectfully and embracing the diversity in people and ideas. As a result, it is essential that everyone take seriously workplace laws in all locations in which Juniper operates. These laws include equal employment opportunity statutes, the Americans with Disabilities Act, and rules or regulations promoting a work environment that is free of discrimination and unlawful harassment. Please see No Discrimination, Retaliation or Harassment.

Substance Abuse (Smoking, Drugs and Alcohol)

Juniper takes the issue of substance abuse seriously. Please refer to Juniper's [Smoking, Drugs and Alcohol Policy](#) for more information.

Violence

Juniper is committed to a work environment that is free of violence and the threat of violence. Any potentially dangerous situations must be reported immediately to HR, and/or Safety and Security. For more information on this topic, please refer to Juniper's [Workplace Violence Prevention Policy](#).

Physical Security

Just as with Juniper assets, please make sure to always secure your personal belongings while at Juniper offices. Always wear your badge in a visible location, and watch for people who "tailgate" you when entering Juniper facilities. Never disable or tamper with security or safety devices. If you see something suspicious, report it immediately to Safety and Security.

Network Security

If you believe that any of Juniper's communication devices, including our intranet, have been compromised, contact the IT department's Information Security team immediately.

17. Cooperation with Investigations

Juniper must conduct investigations of any alleged or actual violations of policies, procedures and laws. You are required to cooperate with any investigation Juniper conducts. You are also required to cooperate with any government investigation in which Juniper requests your participation.

You must take your participation in any investigations seriously. The following actions will result in disciplinary action, including possible termination of employment:

- deliberately provide false or misleading information in an investigation;
- not fully cooperating with an investigation
- not following instructions given to you as part of any investigation. An example of an instruction is not discussing the investigation with other employees.

Q. Nicole is aware of an internal investigation involving a friend in her workgroup. Nicole does not want to answer any questions that may cause a problem for her friend. Does Nicole have to participate in an internal investigation if she is asked to do so by HR or Legal?

A. Yes. All Juniper employees must participate in investigations when asked to do so. Not participating or not following the rules will result in disciplinary action, including possible termination of employment.

18. U.S. Government Matters

Because the U.S. Federal Government and state and local governments are customers of Juniper, we must take special care to ensure that we comply with certain regulations. If you work with U.S. government agencies or subcontractors of any type or do work that involves U.S. government agencies or subcontractors, you must become familiar with and comply with Juniper's [U.S. Public Sector Procurement Policy](#).

Lobbying

We recognize our right and responsibility to lobby on behalf of issues that affect our company and business operations. We conduct our lobbying activities in compliance with applicable laws and regulations governing these activities.

Hiring Government Employees

Because the U.S. Government and other government entities are customers of Juniper, we must follow certain restrictions when we want to hire government employees or even retain them as consultants. Please refer to Juniper's U.S. Public Sector Procurement Policy for further information on this and other related topics.

19. Make a Meaningful Difference

Community Service

Juniper has a strong commitment to working with and providing support to organizations around the world through the Juniper Networks Foundation Fund, by providing disaster relief and through signature partnerships. We encourage you to get involved in the community in a way that is meaningful to you and to utilize Juniper's [Matching Gift Program](#).

In doing so, please be aware of any potential Conflicts of Interest.

JUNIPER VALUE: Make a Meaningful Difference.

Human Rights

Juniper is dedicated to honoring human rights, including the eradication of human trafficking and child labor, and endeavors to ensure that our suppliers and business partners are of the same mindset.

Juniper has adopted the [Electronic Industry Code of Conduct](#), and we have developed a [Supplier Code of Conduct](#) and a [Partner Code of Conduct](#) to ensure that people with whom we do business understand our commitment to ethics and act accordingly.

Environmental, Health and Safety

Juniper is taking innovative, proactive and comprehensive steps to reduce our environmental footprint and to positively contribute to the communities in which we operate and to society at large. We recognize our responsibilities to environmental protection and conservation as it relates to our products, services and activities, as well as our responsibility to provide a healthy, safe and secure work environment. Juniper has developed an [Environmental, Health, Safety and Security Policy](#) that guides our commitments and actions in this area.

20. Changes To the Code

Juniper reserves the right in its sole discretion to modify or eliminate any of the contents of the Code without prior notice. If you fail to read and/or acknowledge the Code, you are not exempted from your responsibility to comply with the Code, applicable laws, regulations, and Juniper policies that are related to your job.

21. Waiver of Code Provisions

Waiver of Code Provisions for Employees

Juniper's General Counsel or Chief Financial Officer must approve in writing the waiver of any provision of the Code. See also Conflicts of Interest.

Waiver of Code Provisions for Executive Officers/Board of Directors

Juniper's Board of Directors must pre-approve a waiver of any provision of the Code by an executive officer or a member of Juniper's Board of Directors.

The waiver must also be promptly disclosed to Juniper's stockholders if required by law or the rules of the stock exchange or over the counter trading system on which Juniper's stock is traded or quoted.

22. Disciplinary Actions

Juniper will take appropriate action against any employee, director or officer who violates the Code policies or any other Juniper policy. At Juniper's sole discretion, disciplinary actions may include immediate termination of employment or business relationship. For violations by a Section 16 executive officer or director, discipline will be made in consultation with Juniper's Audit Committee of the Board of Directors.

Acknowledgement and Receipt

I have received, read and understand Juniper Networks' Worldwide Code of Business Conduct and Ethics. I agree to comply with the Worldwide Code of Business Conduct and Ethics at all times during my employment.

Employee's Signature

Employee's Name (printed)

Date Signed

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