

ARUBA NETWORKS, INC.

COMPLAINT PROCEDURES AND NON-RETALIATION POLICY

Aruba Networks, Inc. (“Aruba” or the “Company”) is committed to providing a workplace conducive to open discussion of its business practices. It is our policy to comply with all applicable laws that protect our employees, including the employees of our subsidiaries, against unlawful retaliation as a result of their lawful, good-faith and reasonable reporting of or participation in investigations involving corporate fraud or other violations of federal and state law. Specifically, this policy is designed to prevent retaliation in the event any person engages in any of the following:

- Disclosing information to a government or law enforcement agency, where such person has a good faith, reasonable belief that the information demonstrates a violation or possible violation of federal or state law, or federal or state regulation;
- Providing information, filing or otherwise participating in or assisting with an investigation or proceeding regarding any conduct that an employee reasonably and in good faith believes involves a violation or possible violation of federal or state law, or federal or state regulation;
- Providing information to Aruba representatives (as designated below) where such person has a good faith, reasonable belief that the information discloses a violation or possible violation of Aruba’s Code of Business Conduct; or
- Providing information to Aruba representatives (as designated below) where such person has good-faith, reasonable complaints or concerns regarding accounting, internal accounting controls and auditing matters.

We will refer to the suspected violations described above as “Compliance Concerns.”

In order to facilitate the reporting of Compliance Concerns, the Company’s Board of Directors has established the procedures set forth below for (1) the receipt, retention and treatment of Compliance Concerns from any person and (2) the confidential, anonymous submission by employees of Compliance Concerns.

HOW TO RAISE A COMPLIANCE CONCERN

If you have a good-faith, reasonable belief that an employee or the Company has engaged in conduct giving rise to a Compliance Concern, you should promptly report it. If you have a Compliance Concern, please contact one of the following individuals:

1. Your Supervisor or Manager. If you are an employee, you are encouraged to discuss Compliance Concerns with your manager first because he or she will often be in the best position to resolve the issue quickly.
2. Your Next Level of Management. If, under the circumstances, reporting to your manager is not appropriate, please report your Compliance Concerns to the next level of management.
3. Our Corporate Compliance Officer. Our Compliance Officer is responsible for administering this policy. Our Compliance Officer is currently Damien Eastwood, who may be reached at (408) 513-8875 or via email at deastwood@arubanetworks.com. Our Compliance Officer is responsible for receiving and reviewing complaints and overseeing investigative procedures (under the direction and oversight of the Audit Committee) under this policy. In her discretion, the Compliance Officer will refer appropriate complaints to the Board of Directors or the Audit Committee.

If the matter to be discussed involves the Compliance Officer, or if for any reason you are uncomfortable discussing the matter with any of the people described above, you may raise the matter with the Chairman of our Audit Committee, Emmanuel Hernandez, who may be reached at (510) 415-9202 and via email at mannyhernandez@comcast.net.

HOW TO RAISE A COMPLIANCE CONCERN ANONYMOUSLY

If, when you report a Compliance Concern you do not wish your identity to be known, you may report the Compliance Concern using the Compliance Online Reporting Hotline (866) 221-0254. Compliance Concerns submitted on this basis will be forwarded to the Compliance Officer. Compliance Concerns related to the Company's accounting, disclosures, internal accounting controls or auditing matter will also be forwarded to the Chairman of the Audit Committee of our Board of Directors. Anonymous reports should be factual instead of speculative or conclusory, and should contain as much specific information as possible to allow the persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

An employee may use this confidential procedure either to raise a new complaint or to report directly to the Audit Committee if he or she feels that a complaint previously raised with a supervisor or the Compliance Officer has not been handled appropriately.

PROCEDURES FOR RECORDING COMPLIANCE CONCERNS

We will record all reports of Compliance Concerns in a log (the "Compliance Log"), which, to the extent possible, will indicate the following information for each Compliance Concern: (1) a description of the Compliance Concern; (2) the date of the report; (3) the persons responsible for reviewing the Compliance Concern; and (4) the disposition of the

matter. The Compliance Officer will retain the Compliance Log and all related documentation as required under applicable law.

PROCEDURES FOR INVESTIGATING COMPLIANCE CONCERNS

In addition to Compliance Concerns that are related to the Company's accounting, disclosures, internal accounting controls or auditing matters, which will be automatically forwarded to the Chairman of the Audit Committee, the Compliance Officer will refer other appropriate Compliance Concerns to the Audit Committee on a periodic, as-needed basis. For each Compliance Concern, the Compliance Officer (under the direction and oversight of the Audit Committee) will assess the planned course of action, including whether to commence an investigation. The status of Compliance Concerns under review or investigation will be reported at least quarterly to the Audit Committee, and if the Audit Committee so directs, to the full Board. The Audit Committee may, in its discretion, request special action for handling any complaint.

The responsibilities of the Compliance Officer and the Audit Committee with respect to investigations of Compliance Concerns will include the following:

1. Assess the nature of the Compliance Concern and determine type of review merited.
2. When an investigation is warranted, assign a Reviewer as appropriate and necessary to ensure that reports of all Compliance Concerns are reviewed in a timely and thorough manner. Ensure that no one assigned to an investigation has a conflict of interest relating to the investigation.
3. Ensure that the proper methods are used to review and investigate Compliance Concerns as appropriate and necessary.
4. Assure that the appropriate executive officers and the Board of Directors are apprised of the allegations as appropriate and necessary, and determine further action, if any.
5. Monitor the significant elements and the progress of investigations to ensure that any action taken to address the reported violation is appropriate for the circumstances.
6. The Compliance Officer will make herself available to discuss with employees any complaints raised or reports filed by them (except to the extent that a complaint is reported anonymously) and provide feedback as necessary or appropriate. Provide feedback to the Compliance Online Reporting Hotline for anonymous reports so that an employee who reports a Compliance Concern anonymously may obtain feedback anonymously by following up via the Compliance Online Reporting Hotline.

NON-RETALIATION

The Company strictly prohibits any discrimination, retaliation or harassment against any person for lawful actions taken in making a good faith complaint regarding Compliance Concerns or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002. The

Company also strictly prohibits any discrimination, retaliation or harassment against any person who participates in an investigation of such complaints.