



Aruba Networks Anti-Boycott Compliance Policy

Aruba Networks is committed to 100% compliance with all U.S. Anti-boycott laws. Current U.S. laws require U.S. firms to refuse to participate in foreign boycotts which the United States does not sanction. The laws prevent U.S. firms from being used to implement foreign policies which are counter to U.S. policy. Compliance to these laws includes all Aruba global business sites and operations.

Although the Anti-boycott laws apply to all non-U.S.-sanctioned boycotts imposed by foreign countries, the Arab League's boycott of Israel is the principal foreign economic boycott concerning U.S. firms.

Provisions of the Anti-boycott law include prohibiting companies from engaging in:

- Agreements to refuse or actual refusal to do business with or in Israel or with blacklisted companies.
- Agreements to discriminate or actual discrimination against other persons based on race, religion, sex, national origin, or nationality.
- Agreements to furnish or actual furnishing of information about business relationships with or in Israel or with blacklisted companies.
- Agreements to furnish or actual furnishing of information about the race, religion, sex, or national origin of another person

To ensure our compliance, Aruba requires the following actions to be taken by all global employees and contractors working for Aruba:

1. Report any and all communication referencing Israel with any of the following to our internal Export Compliance team (email: "dl-xport-compl"):
 - a. Blacklist
 - b. Boycott
 - c. Content
 - d. Origin
 - e. Ownership
 - f. Relationship
 - g. Manufacture
 - h. Vessels
2. Note the following information when reporting any of the above communication:
 - a. Date and communication mode
 - b. Original and translated text of communication
 - c. Transaction value
3. Do not proceed with any transaction if any of the above communication is noted without advice from the Export Compliance team.



Examples of Anti-boycott language (as cited by the Bureau of Industry and Security/BIS)

Following are some examples of prohibited and reportable anti-boycott language, cited by the U.S. Commerce Department's Bureau of Industry and Security. These examples are illustrative and not exhaustive.

Certificate of origin

- "Invoices must be endorsed with a certificate of origin stating that goods are not of Israeli origin, do not contain any Israeli material, and are not shipped from any Israeli port."

Contracts

- "The (tenders) committee may also exclude any bid that does not abide by the provisions of the commercial and economic laws and the provisions of the law of boycott of Israel applicable in the state."
- "[A certificate required stating] that the items have not been manufactured in Israel and that any of the components thereof have not been manufactured in Israel."
- "Vendor shall comply with the Israel boycott laws in performing their contractual obligations."

Instructions to bidders on a contract

- "No produced commodity shall be eligible for financing if such commodity contains any component or components that were imported into the producing country from Israel and countries not eligible to trade with the People's Republic of Bangladesh. The equipment and materials must not be of Israeli origin. Suppliers/bidders that are not blacklisted by the Arab boycott of Israel will be allowed to participate in this bid."

Customs

- "[The vessel entry document asks the ship's captain to certify that] no goods, dry cargo, or personal effects listed on the document of Israeli origin or manufactured by a blacklisted firm or company are to be landed, as they will be subject to confiscation."

Purchase orders

- "Goods of Israeli origin are not acceptable."
- "In the case of overseas suppliers, this order is placed subject to the suppliers being not on the Israel boycott list published by the central Arab League."



Letters of Credit

- "A signed statement from the shipping company, or its agent, stating the name, flag, and nationality of the carrying vessel and confirming...that it is permitted to enter Arab ports."

Power-of-attorney request

- "[Whether the firm] had a plant in Israel, has sold to Israel, had offices in Israel, owned shares in an Israeli firm, had provided services for an Israeli firm, or had granted any trademarks, copyrights, or patent rights to Israeli persons or firms."

Tender

- "The supplier must comply with the Israel boycott conditions."

Additional Anti-boycott Policy Considerations

Aruba's compliance to our Anti-boycott policy includes our Export Compliance team properly reporting any receipts of boycott requests. Any reports will be filed quarterly on form BIS 621-P for single transactions or BIS 6051P for multiple transactions received in the same calendar quarter.

These forms and additional information on the U.S. Anti-boycott Laws are available on-line at:

<http://www.bis.doc.gov/complianceandenforcement/antiboycottcompliance.htm>