

## ARUBA NETWORKS, INC.

### COMPLAINT PROCEDURES FOR EMPLOYEES IN EUROPE

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 data privacy laws of the European Union 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. This policy sets out the applicable complaints procedure in respect 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 +1(408) 513-8875 or via email at [deastwood@arubanetworks.com](mailto: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.
4. Compliance Online Reporting Hotline. Aruba has implemented a Compliance Online Reporting Hotline (the "Hotline") through which you may report a Compliance Concern. The Hotline is available for submission of reports concerning Compliance Concerns [24 hours a day, 7 days a week- through a dedicated toll-free number - (866) 221-0254]. When making reports to the Hotline you will not automatically be asked to identify yourself. However, you may only make an anonymous report in exceptional circumstances after you have explored other means of reporting Compliance Concerns. Aruba strongly discourages you from making reports anonymously. Compliance Concerns submitted to the Hotline 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. 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.

You should only make reports to the Hotline which relate to Compliance Concerns. If you have a concern which does not relate to a Compliance Concern please report this using one of the options 1. to 3. above.

Any person that is the subject of a report that you make through the Hotline ("Subject") will be informed, at an appropriate time, that he or she was the subject of a report, and will receive an explanation of the nature and extent of the reported misconduct. The Subject will also be permitted access to the relevant factual information contained in the report, and may (depending on applicable laws) be entitled to object to the processing of his or her personal data, as well as to correct or delete any such data contained in the report which is inaccurate, incomplete, ambiguous, or out of date. You may, in accordance with applicable data protection laws, enforce your privacy rights, such as request access and the opportunity to review and correct personal information about yourself (if any) obtained through your use of the Hotline or otherwise from your reporting of a Compliance Concern by contacting the Human Resources Department.

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 +1(510) 415-9202 and via email at [mannyhernandez@comcast.net](mailto:mannyhernandez@comcast.net).

## **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**

Whilst Aruba is committed to keeping your report and your identify confidential in so far as reasonably possible, the information in your report which relates to Compliance Concerns may need to be shared with Aruba's Audit Committee, legal Department, and/or the Company's Board of Directors. Your information will be shared only with those who have a need to know, such as those involved in answer your questions or investigating and correcting issues you raise (and where necessary, in respect of possible legal proceedings).

For instance, 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, provided that person has a reasonable belief that a Compliance Concern may have occurred. The Company also strictly prohibits any discrimination, retaliation or harassment against any person who participates in an investigation of such complaints, where such person conducts themselves lawfully, ethically and in good faith.

However, Aruba reserves the right to take action against you if you abuse the Complaint Procedure for an improper or inappropriate purpose or reason. Anyone who makes a report using any of the procedures described in this policy, which he or she knows to be false or without a reasonable belief in the truth and accuracy of the information, or who uses the complaints procedure to spread false information or rumours, threatens others or damage another's reputation may be subject to disciplinary action, up to and including termination.