

**A10 Networks, Inc.**

---

**Conflict Minerals Supply Chain Policy**

Effective April 30, 2015

---

A10 Networks, Inc. (“A10 Networks,” “we” or the “Company”) recognizes that we are a remote downstream participant in the supply chain with limited ability to effect changes at the source of origin of the materials used in our products. Nonetheless, A10 seeks to foster ethical and socially responsible standards throughout our operations for sourcing the materials used in our products. Therefore, we support efforts of third parties to further the humanitarian goal of ending the violence and human rights abuses in the mining of certain minerals in the Democratic Republic of Congo and surrounding countries (collectively, the “DRC”).

We will comply with applicable laws and regulations to which we are subject and that are intended to address these humanitarian and commercial concerns, including rules adopted by the U.S. Securities Exchange Commission (“SEC”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Rule 13p-1 adopted by the SEC under Section 1502 imposes disclosure and reporting obligations on public companies, such as A10 Networks, relating to the use of “conflict minerals” (columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives (limited to tantalum, tin, and tungsten), and gold, or “3TGs”) necessary to the production or functionality of manufactured products.

The purpose of this *Conflict Minerals Supply Chain Policy* is to ensure that participants in our supply chain are aware of and support our practices and procedures in respecting human rights and do not knowingly contribute to local conflict or human rights abuses. We expect our suppliers to comply with our policy on responsible sourcing of minerals from conflict-affected and high-risk areas and to cooperate with our diligence inquiries and requests for information and certification as may be required by us to comply with reporting and disclosure obligations to which we are subject from time to time.

We will employ a reasonable due diligence process consistent with our remote downstream position in the supply chain to obtain, to the extent commercially reasonably practicable, such information as may be necessary to support our required filings with the SEC. Our diligence process is designed to reasonably adhere to the framework and related guidance established by the Organization for Economic Co-operation and Development (“OECD”), including the supplements relating to the 3TGs, as well as cross-industry tools that have been developed and are publicly available to us. We will communicate our Policy to our suppliers and we will support initiatives that assist us in determining whether the minerals used in our products are contributing to conflict or the violation of human rights. We will seek to mitigate risks to the extent commercially reasonably practicable in light of our remote position in the supply chain.

If an individual suspects or becomes aware of any action in violation of this Policy, the person should report the situation to the Legal Department (email: [legal@a10networks.com](mailto:legal@a10networks.com)) or Rob Cochran, Vice President, Legal and Corporate Collaboration (email: [rcochran@a10networks.com](mailto:rcochran@a10networks.com)). If for any reason an individual is uncomfortable discussing the matter with the Legal Department, he or she may raise the matter directly with the Audit Committee at:

Chair, Audit Committee  
c/o A10 Networks, Inc.  
3 West Plumeria Drive  
San Jose, CA 95134

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 and extent of the alleged Policy violation.

The Company will not permit retaliation of any kind against anyone who makes a report or complaint in good faith with a reasonable basis for believing that a violation of this Policy or other illegal, unethical or inappropriate conduct has occurred.