

**CALIX, INC.**  
**CODE OF BUSINESS CONDUCT AND ETHICS**

**INTRODUCTION**

This Code of Business Conduct and Ethics (“*Code*”) contains general guidelines for conducting the business of Calix, Inc. and its subsidiaries (“*Calix*”) consistent with the highest standards of business ethics. This Code applies to all Calix directors, officers and employees. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, Calix adheres to these higher standards. In some regions, local laws, rules or regulations may be stricter than the policies set out in this Code. In those cases, we will follow the local law, rule or regulation.

**Seeking Help and Information**

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with Calix’s ethical standards, seek help. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact Calix’s General Counsel. Calix has also established an **Ethics Helpline that is available 24 hours a day, 7 days a week at 1-877-231-8016 or on the Internet at [www.calix.ethicspoint.com](http://www.calix.ethicspoint.com)**. You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Helpline, although providing your identity may assist Calix in addressing your questions or concerns.

**Reporting Violations of the Code**

You have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to Calix. If you know of or suspect a violation of this Code, immediately report the conduct to your supervisor or Calix’s General Counsel. Calix’s General Counsel will work with you and your supervisor or other appropriate persons to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact Calix’s General Counsel directly. You may also report known or suspected violations of the Code on the Ethics Helpline or on the Internet at [www.calix.ethicspoint.com](http://www.calix.ethicspoint.com). You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Helpline, although providing your identity may assist Calix in investigating your concern. All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor, Calix’s General Counsel and Calix will protect your confidentiality to the extent possible, consistent with law and Calix’s need to investigate your concern.

It is Calix policy that any individual who violates this Code will be subject to appropriate discipline, which may include termination of employment or contract, or removal from the Board of Directors, as appropriate. This determination will be based upon the facts and circumstances of each particular situation. If you are accused of violating this Code you will be given an opportunity to present your version of the events at issue prior to any determination of

appropriate discipline. If you violate the law or this Code you expose yourself to substantial civil damages, criminal fines and prison terms. Calix may also face substantial fines and penalties and may incur damage to its reputation and standing in the community as a result of your conduct.

## **Policy Against Retaliation**

Calix prohibits retaliation against anyone who, in good faith, seeks help or reports known or suspected violations of this Code. Any reprisal or retaliation against anyone who, in good faith, seeks help or files a report will be subject to disciplinary action up to and including termination.

## **Waivers of the Code**

Any waiver of this Code for our directors, executive officers, CFO or Controller (or other principal officers or persons performing similar functions) may only be made only by our Board of Directors and will be disclosed to the public as required by law or the rules of the New York Stock Exchange, when applicable. Waivers of this Code for all others may be made only by our Chief Executive Officer (“CEO”) or General Counsel and will be reported to our Audit Committee.

## **CONFLICTS OF INTEREST**

### **Identifying Potential Conflicts of Interest**

You must act in the best interests of Calix. You must refrain from engaging in any activity or having a personal interest that presents a “conflict of interest” and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of Calix. A conflict of interest can arise whenever you take actions or have an interest that prevents you from performing your duties and responsibilities to Calix honestly, objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations might reasonably be expected to give rise to a conflict of interest and should be identified to, and addressed by, the General Counsel:

- Outside Employment. You should not be employed by, serve as a director of, or provide any services to a company that you know or suspect is a material customer, supplier or competitor of Calix (other than as part of your responsibilities to Calix).
- Improper Personal Benefits. You should not obtain any material (as to him or her) personal benefits or favors because of his or her position with Calix. Please see “Gifts and Entertainment” below for additional guidelines in this area.
- Financial Interests. You should not have a “material interest” (ownership or otherwise) in any company that you know or suspect is a material customer, supplier

or competitor of Calix and using your position to influence a transaction with such company. Whether you have a “material interest” will be determined by the General Counsel in light of all of the circumstances, including consideration of your relationship to the customer, supplier or competitor, your relationship to the specific transaction and the importance of your interest in having the interest.

- Loans or Other Financial Transactions. You should not obtain loans or guarantees of personal obligations from, or enter into any other personal financial transaction with, any company that you know or suspect is a material customer, supplier or competitor of Calix. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- Service on Boards and Committees. You should not serve on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of Calix.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence your objectivity in making decisions on behalf of Calix. For purposes of this Code, “family members” include your spouse or life-partner, brothers, sisters, and parents, in-laws and children whether such relationships are by blood or adoption.

For purposes of this Code, a company is a “material” customer if it has made payments to Calix in the past year in excess of \$120,000. A company is a “material” supplier if it has received payments from Calix in the past year in excess of \$120,000. If you are uncertain whether a company is a material customer or supplier, please contact Calix’s CFO for assistance.

Conflict of interest issues concerning Calix directors will be addressed by the Audit Committee of the Board of Directors.

## **Disclosure of Conflicts of Interest**

Calix requires that you disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your supervisor or Calix’s General Counsel, or if you are a director or executive officer, to the Audit Committee of the Board of Directors. Your supervisor and Calix’s General Counsel, or the Audit Committee of the Board of Directors, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in “Waivers of the Code” above.

## **CORPORATE OPPORTUNITIES**

You have an obligation to advance Calix’s interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of Calix property or information or because of your position with Calix, you should first present the business

opportunity to Calix before pursuing the opportunity in your individual capacity. You may not use Calix property, information or your position with Calix for personal gain, nor should you compete with Calix during your term of service with us.

You should disclose to your supervisor the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your supervisor will contact the General Counsel and the appropriate management member to determine whether Calix wishes to pursue the business opportunity. If Calix waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

## **CONFIDENTIAL INFORMATION**

You have access to a variety of confidential information regarding Calix. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to Calix or its partners, customers or suppliers. You have a duty to safeguard all confidential information of Calix or third parties with which Calix conducts business, except when disclosure is authorized or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, you should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Calix or another company, is not communicated within Calix except to employees and directors who have a need to know such information to perform their responsibilities for Calix. The obligation to protect confidential information continues after you leave Calix. Unauthorized disclosure of confidential information could cause competitive harm to Calix or its partners, customers or suppliers and could result in legal liability to you and Calix.

Any questions or concerns regarding whether disclosure of Calix information is legally mandated should be promptly referred to the General Counsel.

## **COMPETITION AND FAIR DEALING**

You should endeavor to deal fairly with fellow Calix employees and contractors, and with Calix's customers, suppliers and competitors. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. You should maintain and protect any intellectual property licensed from licensors with the same care as they employ with regard to Calix-developed intellectual property. Employees should also handle the nonpublic information of our partners, licensors, suppliers and customers responsibly and in accordance with our agreements with them, including information regarding their technology and product pipelines.

### **Relationships with Customers**

Our business success depends upon our ability to foster lasting customer relationships. Calix is committed to dealing with customers fairly, honestly and with integrity. Specifically, you should keep the following guidelines in mind when dealing with customers:

- Information you supply to customers should be accurate and complete to the best of our knowledge. You should not deliberately misrepresent information to customers.
- You may not refuse to sell, service or maintain products Calix has produced simply because a customer is buying products from another supplier.
- Customer entertainment should not exceed reasonable and customary business practice. You should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for, customer purchase decisions. Please see “Gifts and Entertainment” below for additional guidelines in this area.

### **Relationships with Suppliers**

Calix deals fairly and honestly with its suppliers. This means that our relationships with suppliers are based on price, quality, service and reputation, among other factors. When dealing with suppliers you should be careful to remain objective. You may not accept or solicit any personal benefit from a supplier or potential supplier that might compromise, or appear to compromise, your objective assessment of the supplier’s products and prices. You may give or accept promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice. Please see “Gifts and Entertainment” below for additional guidelines in this area.

### **Relationships with Competitors**

Calix is committed to free and open competition in the marketplace. You should avoid actions that would be contrary to laws governing competitive practices in the marketplace, including federal and state antitrust laws. Such actions include misappropriation or misuse of a competitor’s confidential information and making false statements about the competitor’s business and business practices. For further discussion of appropriate and inappropriate business conduct with competitors, see “Compliance with Antitrust Laws” below.

## **GIFTS AND ENTERTAINMENT**

Giving and receiving gifts is a common business practice. Appropriate business gifts and entertainment are courtesies designed to build relationships and understanding among business partners. Gifts and entertainment, however, should not compromise, or appear to compromise, your ability to make objective and fair business decisions. In addition, it is important to note that the giving and receiving of gifts are subject to a variety of laws, rules and regulations applicable to Calix’s operations. These include, without limitation, laws covering the marketing of products, bribery and kickbacks. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. For additional information regarding Calix’s policies related to gifts and entertainment, please refer to Calix’s Employee Handbook and the Anti-Bribery Compliance Policy on Calix’s intranet site.

## **COMPANY RECORDS**

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports and many other aspects of our business and guide our business decision-making and strategic planning. Calix records include financial records, personnel records and all other records maintained in the ordinary course of our business. All Calix records must be complete, accurate and reliable in all material respects.

You must follow the Calix Document Retention Policy with respect to Calix records within your control. A request for a copy of our Document Retention Policy or questions concerning such policy should be directed to Calix's General Counsel.

## **PROTECTION AND USE OF CALIX ASSETS**

You should protect Calix's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness and waste have a direct impact on our financial performance. The use of Calix funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited. To ensure the protection and proper use of Calix's assets, you must:

- Exercise reasonable care to prevent theft, damage or misuse of Calix property;
- Report the actual or suspected theft, damage or misuse of Calix property to a supervisor;
- Use Calix's telephone system, internet, email and other communication services, written materials and other technology and property primarily for business-related purposes;
- Safeguard all electronic programs, data, communications and written materials from inadvertent access by others; and
- Use Calix property only for legitimate business purposes, as authorized in connection with your job responsibilities.

Calix property includes all data and communications transmitted or received to or by, or contained in, Calix's electronic or telephonic systems, as well as all written communications. You should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, Calix has the ability, and reserves the right, to monitor all electronic and telephonic communications transmitted over our systems. These communications may also be subject to disclosure to law enforcement or government officials.

## **ACCURACY OF FINANCIAL REPORTS AND OTHER PUBLIC COMMUNICATIONS**

As a public company we are subject to various securities laws, regulations and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete

information regarding our business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage Calix and result in legal liability.

Calix's CFO and Finance Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These individuals must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting.

## **COMPLIANCE WITH LAWS AND REGULATIONS**

You have an obligation to comply with all laws, rules and regulations applicable to Calix's operations. These include, without limitation, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all such laws, rules and regulations that apply to your position. If any doubt exists about whether a course of action is lawful, you should seek advice from your supervisor or Calix's General Counsel.

## **INTERACTIONS WITH THE GOVERNMENT**

In the course of your duties at Calix, you may interact with national, state and local governments in the U.S. and in other countries. Calix is committed to conducting its business with all governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the special requirements that apply to communications with governmental bodies that may have regulatory authority over our products and operations, government contracts and government transactions. In all such interactions with the government, you should:

- Be forthright and candid at all times. You should never intentionally misstate or omit any material information from any written or oral communication with any government.
- Ensure that all required written submissions are made to the government and are timely, and that all written submissions, whether voluntary or required, satisfy applicable laws and regulations.
- You should not offer or exchange any gifts, gratuities or favors with, or pay for meals, entertainment, travel or other similar expenses for, government representatives.

If your responsibilities include interacting with the government, you are expected to understand and comply with all laws, rules and regulations that apply to your position, as well as with all Calix policies. If you have any doubt about whether a course of action is lawful, you should seek advice immediately from your supervisor and Calix's General Counsel.

In addition to the above, you must review with the Calix legal department communications relating to any work activity that requires communication with any member or employee of a legislative body or with any government official or employee. Work activities covered by this policy require approval of Calix's General Counsel and include meetings with legislators, members of their staffs or with senior executive branch officials on behalf of Calix. If any doubt exists about whether a given work activity would be considered covered by this provision, you should seek advice immediately from your supervisor and Calix's General Counsel.

For additional information regarding the Company's policies on interactions with governments, please see the Company's Anti-Bribery Compliance Policy, which can be found on Calix's intranet site.

## **POLITICAL CONTRIBUTIONS AND ACTIVITIES**

Calix encourages you to participate in the political process as an individual and on your own time. However, it is Calix policy that our funds or assets not be used to make contributions to any political party or candidate, unless prior approval has been given by Calix's CEO and General Counsel. No political contributions may be made on behalf of Calix without review by the General Counsel and the written approval of the Chief Executive Officer. Calix will not reimburse you for personal political contributions.

The following guidelines are intended to ensure that any political activity you pursue complies with this policy:

- Contribution of Funds. You may contribute personal funds to political parties or candidates. Calix will not reimburse you for personal political contributions.
- Volunteer Activities. You may participate in volunteer political activities during non-work time. You may not participate in political activities during working hours.
- Use of Calix Facilities. Calix's facilities generally may not be used for political activities (including fundraisers or other political activities). Calix may make its facilities available for limited political functions, including speeches by government officials and political candidates, with the approval of Calix's CEO or General Counsel.
- Use of Calix Name. When you participate in political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of Calix. Neither Calix letterhead nor Calix email accounts should be used to send out communications in connection with political activities.

These guidelines are intended to ensure that any political activity you pursue is voluntary, using your own resources and time. Contact Calix's General Counsel if you have any questions.



## **COMPLIANCE WITH COMPETITION LAWS**

Competition laws of the United States and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically, while complying with all antitrust, monopoly, competition or cartel laws in countries, states or localities in which Calix conducts business. Violations of competition and antitrust laws may result in severe penalties against Calix and you personally, including fines and criminal sanctions. You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should consult Calix's General Counsel with any questions you may have concerning compliance with these laws.

### **Meetings with Competitors**

You should exercise caution in meetings with competitors. Any meeting with a competitor may give rise to the appearance of impropriety. As a result, if you are required to meet with a competitor for any reason, you should obtain the prior approval of the General Counsel. You should try to meet with competitors in a closely monitored, controlled environment for a limited period of time. You should create and circulate agendas in advance of any such meetings, and the contents of your meeting should be fully documented. Specifically, you should avoid any communications with a competitor regarding:

- Price;
- Cost;
- Market share;
- Allocation of sales territories;
- Profits and profit margins;
- Supplier's terms and conditions;
- Product or service offerings;
- Terms and conditions of sale;
- Bids for a particular contract or program;
- Selection or retention of customers;
- Distribution methods or channels;
- Marketing strategies;
- Future development plans or product roadmaps; or
- Other subjects relating to the sale of products to existing or prospective customers.

If you participate in a meeting with a competitor in which any of the above topics are broached, you should affirmatively end the discussion, and you should state your reasons for doing so. During meetings with competitors, avoid sharing or obtaining confidential information from the competitor. Also avoid statements that could be construed as unfair acts such as harassment, threats or interference with the competitors' existing contractual relationships.

### **Professional Organizations and Trade Associations**

You should be cautious when attending meetings of professional organizations and trade

associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose and are conducted in an open fashion, adhering to a proper agenda. At such meetings, you should not discuss the restricted topics listed above, Calix's pricing policies or other competitive terms or any other proprietary or competitively sensitive information.

## **COMPLIANCE WITH INSIDER TRADING LAWS**

You are prohibited from trading in Calix securities while in possession of material, nonpublic information about Calix or its subsidiaries. In addition, you are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell Calix securities on the basis of material, nonpublic information. If you obtain material, non-public information about another company, you are prohibited from trading in the securities of the other company while in possession of such information or "tipping" others to trade on the basis of such information.

Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by Calix up to and including termination. You are required to read carefully and observe our Insider Trading Compliance Program, as amended from time to time, which may be accessed from Calix's intranet site.

## **PUBLIC COMMUNICATIONS AND REGULATION FD**

### **Public Communications Generally**

Calix places a high value on its credibility and reputation in the community. What is written or said about Calix in the news media and investment community directly impacts our reputation and stock price. Our policy is to provide timely, accurate and complete information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. To ensure compliance with this policy, all news media or other public requests for information regarding Calix should be directed to the Investor Relations Director, who will work with you and other appropriate personnel to evaluate and coordinate a response to the request.

### **Compliance with Regulation FD**

In connection with its public communications, Calix is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for "fair disclosure"). Regulation FD provides that, when we disclose material, non-public information about Calix to securities market professionals or Calix's stockholders, we must also disclose the information to the public. Calix has designated certain individuals as "spokespersons" who are responsible for communicating with analysts, institutional investors and representatives of the media. Any employee or director who is not a designated spokesperson of Calix is prohibited from communicating any information about Calix to analysts, institutional investors, other stockholders or representatives of the media, except at the request of Calix's designated spokespersons. For more information on Calix's policies and procedures regarding public

communications and Regulation FD please contact Calix's General Counsel.

## **ANTI-CORRUPTION COMPLIANCE AND THE U.S. FOREIGN CORRUPT PRACTICES ACT**

Calix is committed to complying with the U.S. Foreign Corrupt Practices Act (the "*FCPA*") and other applicable anti-corruption laws. For additional information regarding our anti-corruption policies and procedures, please see the Company's Anti-Bribery Compliance Policy, which can be found on Calix's intranet site.

## **INTERNATIONAL TRADE LAWS**

Calix must know and comply with U.S. laws and regulations that govern international operations, as well the local laws of countries where the Company operates. The United States and many countries have laws that restrict or otherwise require licensing for the export or import of certain goods and services to or from other countries or to or from certain parties. If you are involved with importing, you need to be aware of applicable regulations and requirements, including those required by the U.S. Customs-Trade Partnership Against Terrorism (C-TPAT). A failure to comply can result in fines, penalties, imprisonment and/or a loss of import privileges. These laws and regulations also impose various trade sanctions or embargoes against other countries or persons and prohibit cooperation with certain boycotts imposed by some countries against others. Calix does not participate in prohibited boycotts.

The scope of these licensing requirements, trade sanctions, and trade embargoes may vary from country to country. They may range from specific prohibitions on trade of a given item to a total prohibition of all commercial transactions. It is important to note that Calix may not facilitate or encourage a non-U.S. company to perform a transaction that it could not perform itself pursuant to sanctions laws.

If you are involved in export or import transactions or international operations you must familiarize yourself with the list of countries against which the United States maintains comprehensive sanctions and the rules relating to exporting to, importing from or transacting with such countries, either directly or indirectly through foreign subsidiaries or other third parties. In addition, Calix must comply with U.S. counter-terrorism requirements when engaging in international trade. Due to the complexities of these international trade laws, contact the General Counsel before exporting or importing goods or services, or engaging in transactions with countries or persons that may be affected by economic or trade sanctions. If requested to participate in or cooperate with an international boycott that the United States does not support (*e.g.*, the boycott of Israel sponsored by the Arab League), you may not agree to or comply with such request. Immediately report this request to the General Counsel.

## **ENVIRONMENT, HEALTH AND SAFETY**

Calix is committed to providing a safe and healthy working environment and to avoiding adverse impact and injury to the environment and the communities in which it does business. You must comply with all environmental, health and safety laws, regulations and Calix

standards. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your position. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability against you and Calix, as well as disciplinary action by Calix up to and including termination. You should contact Calix's General Counsel if you have any questions about the laws, regulations and policies that apply to you. If you have a concern about unsafe conditions or tasks that present a risk of injury to you, please report these concerns immediately to your supervisor or the General Counsel.

## **EMPLOYMENT PRACTICES**

Calix pursues fair employment practices in every aspect of its business. The following is only intended to be a summary of certain of our employment policies and procedures. Copies of Calix's detailed policies, including its Employee Handbook, are available on Calix's intranet site and from the Calix Talent and Culture Department. You must comply with all labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your position. Failure to comply with labor and employment laws can result in civil and criminal liability against you and Calix, as well as disciplinary action by Calix up to and including termination. You should contact Calix's General Counsel if you have any questions about the laws, regulations and policies that apply to you.

### **Harassment and Discrimination**

Calix is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law. Calix also prohibits harassment based on these characteristics in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive or racially degrading objects or pictures.

If you have any complaints about discrimination or harassment, report such conduct to your supervisor, the General Counsel or the Talent and Culture Department. All complaints will be treated with sensitivity and discretion. Calix will protect your confidentiality to the extent possible, consistent with law and Calix's need to investigate your concern. Alternatively, you may report complaints about discrimination or harassment via the Ethics Helpline at 1-877-231-8016 or [www.calix.ethicspoint.com](http://www.calix.ethicspoint.com). Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by Calix up to and including termination. Calix strictly prohibits retaliation against an individual who, in good faith, files a complaint.

Any member of management who has reason to believe that anyone has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the General Counsel or Talent and Culture Department immediately.

## **Alcohol and Drugs**

Calix is committed to maintaining a drug-free workplace. All Personnel must comply with Calix policies regarding the abuse of alcohol and the possession, sale and use of illegal substances. Drinking alcoholic beverages is prohibited while on duty or on the premises of Calix, except at specified Calix-sanctioned events. Possessing, using, selling or offering illegal drugs and other controlled substances is prohibited under all circumstances while on duty or on company premises. Likewise, you are prohibited from reporting for work, or driving a Calix vehicle or any vehicle on Calix business, while under the influence of alcohol or any illegal drug or controlled substance.

## **Violence Prevention and Weapons**

Your safety and security are vitally important. Calix will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on Calix's property or affects Calix's business you must immediately report the situation to your supervisor, the General Counsel or the Talent and Culture Department.

Calix does not permit any individual to have weapons of any kind on Calix property or in vehicles, while on the job or off-site while on Calix business. This is true even if you have obtained legal permits to carry weapons. The only exception to this policy applies to security personnel who are specifically authorized by Calix management to carry weapons.

## **CONCLUSION**

This Code contains general guidelines for conducting the business of Calix consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your supervisor, Calix's General Counsel or the Ethics Helpline at 1-877-231-8016 or [www.calix.ethicspoint.com](http://www.calix.ethicspoint.com).

This Code, as applied to Calix's CEO and CFO, shall be Calix's "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and its associated rules.

This Code and its contents are neither a contract of employment nor a guarantee of continuing Calix policy. Calix reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

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Adopted by the Board of Directors  
on August 13, 2020