

**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.

**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 Chief Financial Officer (“CFO”) or 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.** 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 CFO. Calix’s CFO 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 CFO directly. You may also report known or suspected violations of the Code on the Ethics Helpline. 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 CFO 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 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 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. Waivers of this Code for all others may be made only by our Chief Executive Officer (“CEO”) or CFO and will be reported to our Audit Committee.

## CONFLICTS OF INTEREST

### Identifying Potential Conflicts of Interest

A conflict of interest can occur when your private interest interferes, or appears to interfere, with the interests of Calix as a whole. You should avoid any private interest that influences your ability to act in the interests of Calix or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations are examples of conflicts of interest:

- **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 significant financial interest (ownership or otherwise) in any company that you know or suspect is a material customer, supplier or competitor of Calix. A “significant financial interest” means (i) ownership of greater than 1% of the equity of any such entity or (ii) an investment in any such entity that represents more than 5% of your total assets.
- **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 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 CFO. Your supervisor and Calix’s CFO 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 CFO 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 customers. 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. The obligation to protect confidential information continues after you leave Calix. Unauthorized disclosure of confidential information could cause competitive harm to Calix or its customers 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 practice.

### **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.

It is your responsibility to use good judgment in this area. As a general rule, you may give or receive gifts or entertainment to or from customers or suppliers only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. All gifts and entertainment expenses should be properly accounted for on expense reports. The following specific

examples may be helpful:

- Meals and Entertainment. You may occasionally accept or give meals, refreshments or other entertainment if:
  - The items are of reasonable value;
  - A primary purpose of the meeting or event is business related; and
  - The expenses would be paid by Calix as a reasonable business expense if not paid for by another party.

Entertainment of reasonable value may include meals or tickets for sporting and cultural events, if they are generally offered to other customers, suppliers or vendors.

- Advertising and Promotional Materials. You may occasionally accept or give advertising or promotional materials of nominal value.
- Personal Gifts. You may accept or give personal gifts of reasonable value that are related to recognized special occasions such as a graduation, promotion, new job, wedding, retirement or holiday. A gift is also acceptable if it is based on a family or personal relationship and unrelated to the business involved between the individuals.
- Gifts Rewarding Service or Accomplishment. You may accept a gift from a civic or charitable organization specifically related to your service or accomplishment.

If you conduct business in other countries, you must be particularly careful that gifts and entertainment are not construed as bribes, kickbacks or other improper payments. See the Calix, Inc. Anti-Bribery Compliance Policy for a more detailed discussion regarding giving or receiving gifts related to business transactions in other countries.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your supervisor. Your supervisor will bring the gift to the attention of the CFO, who may require you to donate the gift to an appropriate organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your supervisor or Calix's General Counsel for additional guidance.

Note: Gifts and entertainment may not be offered or exchanged under any circumstances to or with any representatives of any national, state or local governments. If you have any questions about this policy, contact your supervisor for additional guidance. For a more detailed discussion of special considerations applicable to dealing with governments, see "Interactions with Governments."

## **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. Theft, carelessness and waste have a direct impact on our profitability. 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.

## **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 or CFO.

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 CFO.
- 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 ANTITRUST LAWS**

Antitrust 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 laws in countries, states or localities in which Calix conducts business. Violations of 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. The following is a summary of actions that violate antitrust laws:

- **Price Fixing.** Calix may not agree with its competitors to raise, lower or stabilize prices or any element of price, including discounts and credit terms.
- **Limitation of Supply.** Calix may not agree with its competitors to limit the quantity or type of product production or restrict the supply of its services.
- **Allocation of Business.** Calix may not agree with its competitors to divide or allocate markets, territories or customers.
- **Monopoly.** Calix may not engage in any behavior that can be construed as an attempt to monopolize.
- **Boycott.** Calix may not agree with its competitors to refuse to sell or purchase products from certain third parties or to certain customers. In addition, Calix may not prevent a customer from purchasing or using non-Calix products or services.
- **Tying.** Calix may not require a customer to purchase a product that it does not want as a condition to the sale of a different product that the customer does wish to purchase.
- **Price Discrimination.** Calix may under some circumstances be prohibited from charging similarly situated customers different prices for the same product or service. Consult with Calix's CFO or General Counsel before undertaking any such pricing practices.

### **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:

- Prices;



- Costs;
- 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, non-public 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, which may be accessed from CPoint.

## **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 (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 Senior Director, Corporate Marketing, or 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 stockholders, we must also disclose the information to the public. “Securities market professionals” generally include analysts, institutional investors and other investment advisors. Our Policy Statement Containing Guidelines for Corporate Disclosures can be found on CPoint.

## **ANTI-BRIBERY COMPLIANCE POLICY**

The Calix, Inc. Anti-Bribery Compliance Policy prohibits you from offering or giving money or any other item of value to win or retain business or to influence any act or decision. Stated more concisely, the policy prohibits the payment of bribes, kickbacks or other inducements to anyone. This prohibition also extends to payments to a sales representative or agent if there is reason to believe that the payment will be used indirectly for a prohibited payment. Violation of this policy is likely to also constitute a crime under the laws of the U.S. and other countries that can result in severe fines and criminal penalties, as well as disciplinary action by Calix up to and including termination. The Calix, Inc. Anti-Bribery Compliance Policy can be found on CPoint.

## **IMPORT LAWS AND COUNTER-TERRORISM**

Calix must comply with import regulations as well as counter-terrorism requirements when engaging in international trade. If you are involved with importing, you need to be aware of the applicable governmental regulations and requirements, including those required by the Customs-Trade Partnership Against Terrorism (C-TPAT). A failure to comply can result in fines, penalties, imprisonment and/or a loss of import privileges.

## **EXPORT LAWS**

In general, anything Calix ships out of the United States must be covered by an export license. There are certain statutory general licenses which allow Calix to export some products without a specific license. Export control regulations are, however, quite complex and differ for companies located in the United States and abroad. If you are involved in any export transaction you must observe at least these three rules:

- satisfy yourself that there is some export license that allows the export you want to make;
- familiarize yourself with the list of countries against which the U.S. maintains total or partial bans on exports and the rules relating to exporting to such countries either directly or indirectly through foreign subsidiaries or other third parties; and
- any information that you furnish to other Calix employees, to the government or to companies that Calix may have hired to facilitate its export transactions must be truthful.

It is important to note that a domestic company may not facilitate or encourage a non-domestic company or subsidiary to perform a transaction that the domestic company could not perform directly itself under the export sanctions laws. If you have questions regarding import/export laws, contact Calix's 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. Copies of Calix's detailed policies, including its Employee Handbook, are available on CPoint 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 Talent and Culture Department 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 or the Talent and Culture Department. All complaints will be treated with sensitivity and discretion. Your supervisor, the Talent and Culture Department and 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 or the Ethics Helpline at 1-877-231-8016. 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 Talent and Culture Department immediately.

### **Alcohol and Drugs**

Calix is committed to maintaining a drug-free work place. 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. 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 is 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 or Calix's CFO or the Ethics Helpline at 1-877-231-8016.

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, without prior notice, at any time.