



CITRIX

Citrix code of business conduct

June
2018

CEO's Message

Our Code of Business Conduct sets the standards of conduct for those working for or on behalf of Citrix. This important document articulates our values, and serves as a foundation for Citrix policies and practices. All of Citrix must act with integrity; and be responsible for complying with this Code, Citrix policies and all applicable laws and regulations.

If you have a question about this Code, need guidance on a legal or ethical issue or would like to raise concerns, you can contact your manager, Citrix [Legal Compliance Officer](#) or use the Citrix [HelpLine](#) or the [Human Resources Contact List and Tools](#), both available in Backstage. All concerns raised will receive prompt and full attention. Please be assured that Citrix will not tolerate any retaliation or adverse action against you for raising a good faith concern.

As Citrix works to demonstrate its core values of Integrity, Respect, Curiosity, Courage, and Unity, please also commit to reading, understanding and complying with this Code. I thank you in advance for all that you bring to Citrix and your role in preserving our ethical culture.

David Henshall

Introduction

Citrix standards

This Code sets out Citrix's expectations for the Citrix community (including its employees, directors, partners, suppliers and contractors). Citrix does not expect you to know this Code and all Citrix policies word for word. However, Citrix does expect you to have a basic understanding of the issues and a detailed understanding of matters that apply to your job. While this Code covers many matters, it is not intended to be all-inclusive or to address every situation. Citrix policies are available on Citrix internal websites or from your human resources or legal team contact.

When you follow some basic guidelines, you will help Citrix maintain its high standard of business conduct:

- Always comply with the law and Citrix policies, using good judgment, common sense and the highest standards of ethical conduct
- Treat all Citrix employees, customers and partners in an honest and fair manner
- Disclose activities, financial interests or relationships that may be or may appear to be a conflict of interest. Obtain prior written approval where appropriate
- Create an environment where employees feel they can voice their concerns
- Safeguard and properly use Citrix proprietary and confidential information, assets and resources, as well as those of Citrix customers and partners
- Report suspected unethical or illegal behavior to the appropriate Citrix resources
- Always ask any questions or raise a concern you have about possible violations of laws, this Code or Citrix policies. There are a number of ways you can do this (see "Ask questions and raise concerns" at the end of this Code), and you can do this confidentially and anonymously, if you wish and if permitted in your country
- Cooperate with Citrix personnel conducting investigations

Citrix expects the Citrix community worldwide to comply with this Code and Citrix policies. Citrix is committed to taking prompt and consistent action against anyone who violates this Code, which may include disciplinary actions, termination of employment or termination of any other business relationship.

Question

I work in various countries where there are different laws and business customs. Do I need to comply with the Code? What happens if the Code differs from the laws and business customs in the particular country in which I am doing business?

Answer

Everyone worldwide must comply with the Code, regardless of which country you are in or which Citrix organization or business for which you are working. The Code establishes global standards for conducting Citrix business, wherever you are. Where there are differences between the Code and local laws or business customs, you must always follow the highest standards of business conduct. Where there is a conflict, you are always expected to ask questions and raise your concerns before taking any action.

Acting ethically

Citrix workplace

All employees should be treated fairly and with respect

Citrix values employee diversity and equal opportunity for all. Moreover, employee welfare is very important to us, and Citrix is respectful of both the environment in which the Citrix community works and the people on whom it depends.

Citrix will not tolerate in any aspect of the employment relationship any discrimination or harassment based on race, color, religion, gender, ethnicity, national origin, pregnancy, childbirth or related medical conditions, disability, age, marital status, medical condition, veteran status, citizenship, sexual orientation, genetic information, any other basis protected by federal, state, or local law, ordinance or regulation, or any other factors that are not related to a person's job-related qualifications and the legitimate business interest of Citrix.

As part of Citrix commitment to a positive work environment, Citrix expects all employees to adhere to its core values, which includes treating everyone with respect. Citrix prohibits any conduct that creates an intimidating, offensive or hostile working environment, or that interferes with work performance. Citrix has policies on discrimination, sexual harassment, and other types of harassment that include examples of inappropriate conduct and the procedures for reporting, investigating, and addressing complaints about improper conduct.

See Citrix's [Anti-Harassment / Anti-Discrimination Policy](#)

Preserving the health and safety of Citrix employees and others working in its offices is essential. You must never engage in violence or other harmful actions. These may include:

- Threats of physical or psychological harm,
- Violent or bullying behavior, and
- Distribution, sale, or possession on Citrix, customer or partner premises of illegal drugs or any other controlled substance (other than for approved medical purposes)

See Citrix [Health and Safety Guidelines](#).

Moderate and prudent consumption of alcohol at a company-sponsored function or during legitimate business entertainment is permitted. However, you should not be on Citrix premises, at Citrix events or in the workplace if you are using, under the influence of, or affected by illegal drugs or any other controlled substance (other than for approved medical purposes).

See Citrix [Drug and Alcohol Policy and Alcohol Use Guidelines](#)

Citrix is committed to adhering to applicable employment laws (such as child labor laws and laws relating to wages, hours and working conditions), and to working with socially responsible partners that embrace high standards of ethical behavior and treat their employees fairly and with respect. Citrix supports fair and living wages for all employees. Citrix partners' commitment to the health and safety of their employees is also important to us, and Citrix will avoid working with partners that do not comply with laws relating to child labor, wages, hours, and working conditions. Furthermore, Citrix prohibits and will not tolerate slavery or trafficking in persons or the use of forced or child labor by anyone in the Citrix Community, including Citrix partners and suppliers. Partners and suppliers are required to comply with all applicable laws and regulations relating to, and to take affirmative steps to combat, slavery and trafficking in persons and forced or child labor.

See [US Labor Laws](#) Summary.

Question

I believe my manager may have engaged in harassment or discrimination, but I am reluctant to report it because I am concerned about the impact on my job.

Answer

Citrix commitment to a workplace free of harassment and discrimination of any kind is unwavering. You should report your concerns to Human Resources or to the local Legal representative in your region. Your standing in your job will not be affected by raising or helping to resolve, in good faith, any concerns about possible violations of law, this Code, or Citrix policies.

Avoid conflicts of interest

Always disclose situations that have potential to create a conflict of interest

Citrix encourages you to take part in legitimate financial, business, and other activities outside your job so long as they do not conflict with your responsibilities to Citrix.

Conflicts of interest usually occur when an individual's personal interests interfere (or appear to interfere) with the interests of the company as a whole. They can arise when you take action or have interests that make it difficult for you to perform your job objectively or effectively or otherwise interfere with your ability to make objective business decisions on behalf of Citrix. Conflicts can also arise when you or your family members or friends receive improper benefits because of your position at Citrix.

It is often difficult to determine if a conflict of interest exists, and one may arise unexpectedly. If you think you may have a conflict of interest—actual or potential—always disclose it in writing to your manager and the [Legal Compliance Officer](#) immediately. Just because a conflict of interest exists does not mean the activity or action will be prohibited. It is, however, important to resolve the conflict of interest to protect you and Citrix. Having a conflict is not necessarily a violation of the Code, but failing to disclose it is.

See Conflict of Interest Disclosure Form

Examples of potential conflicts of interest

Investments

Holding an investment (directly or indirectly) in a competitor, vendor, customer, reseller, distributor, or other company that does business with Citrix that would appear to impact your judgment of what is in the best interests of Citrix.

Other employment/services

Being employed by, providing services to, or representing a competitor, vendor, customer, reseller, distributor, or other company that does or has the potential to do business with Citrix.

Citrix business opportunities

Taking advantage of any business opportunity and competing with Citrix by providing services, purchasing or selling any property or diverting from Citrix any business opportunity in which Citrix has or is likely to have an interest.

Use of Citrix assets

Using Citrix funds, facilities, equipment, know-how, or personnel for any other business or personal endeavors.

Gifts, entertainment, things of value

Accepting or offering (directly or indirectly) anything of value from or to a competitor, vendor, customer, partner, reseller or distributor—particularly where the purpose is (or could appear to be) to improperly influence a business decision or relationship.

Personal relationships

Conducting business with any competitor, vendor, customer, reseller, distributor, or other company that is owned or controlled by a relative, family member, or close friend. Also, hiring a relative, family member or close friend without first disclosing

your
relationship
to that
person.

Question

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I am responsible for selecting an outside IT company to perform certain services at Citrix's field office. My brother-in-law's company is located near its field office, has an outstanding reputation, and would be the ideal choice. Can Citrix hire my brother-in-law's company?

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Answer

Possibly. Citrix employees are expected to make decisions that are in the best interest of Citrix and that avoid conflicts of interest for Citrix employees. All contracts between Citrix and third parties must be negotiated at arm's length. Before recommending your brother-in-law's company, you must fully disclose this familial relationship to your manager and the Legal Compliance Officer, as well as any benefit you might derive from this hiring decision. You may potentially recuse yourself from the selection process. Your brother-in-law's company's bid should be given the same consideration as other vendors so that the company hires the best service provider.

Citrix supports and respects its communities

Citrix is a responsible, caring member of the global community

Citizenship and community service

The tie between work and well being is at the core of Citrix corporate citizenship efforts. Citrix is committed to community service and focus its resources on community-based projects, such as helping families in need where employees live and work. Citrix supports the key interest areas of K-12 education, environmental stewardship and technology advancement and provide corporate grants, support employee giving, encourage volunteerism and offer product donations, enabling those in Citrix's global communities to enjoy stable, satisfying and rewarding lives.

See [Volunteering and Donations](#) on Backstage for more details

Respect for the environment

Citrix respects the environment and protect natural resources. Citrix complies with applicable laws and regulations regarding the use and preservation of land, air, and water, and is committed to working with socially responsible partners who likewise comply.

Protecting our business

Protect company assets

Protect Citrix assets and those of our customers and partners, particularly confidential information

Always use Citrix assets for legitimate business purposes. When you are entrusted with these assets, you are responsible for making sure that adequate safeguards exist to prevent their unauthorized use, loss or destruction.

Confidential information of Citrix is a valuable asset. You should use confidential information only as authorized and only for Citrix business.

What is confidential information?

Confidential information includes all non-public information that might be of use to competitors or harmful to Citrix or its customers, partners or vendors if disclosed.

Citrix also receives and agrees to keep certain third-party information confidential (for example, under a confidentiality or non-disclosure agreement). This may include data to which our customers give us access to provide services.

Your responsibility to protect confidential information applies whether or not the information is labeled or designated as proprietary or confidential, and it applies even after you have left Citrix. You are responsible for checking whether an appropriate confidentiality agreement is in place before disclosing confidential information to any third party.

If you believe that you or anyone else may have disclosed confidential information or otherwise misused Citrix assets, even if inadvertently, you must discuss this with the [Legal Compliance Officer](#) immediately.

Things to remember:

- Take care when storing anything that may be considered Citrix confidential information. For example, do not download or store Citrix confidential information on an unsecured or unapproved device or storage solution. If you have any question about what devices and solutions are approved, please contact a member of the IT security team
- Never share your passwords with anyone
- Never discuss confidential information with unauthorized people. This could include family members or friends who might inadvertently pass the information on to someone else. It could also include other employees who are not authorized
- Be careful when you are discussing confidential information in public locations (for example, at a trade show or in a restroom, restaurant, airplane, or elevator)
- Be careful about downloading or clicking on emails or attachments that may contain malware. All files coming from external sources should be checked for viruses and malware
- Abide by Citrix's [Social Media Guidelines](#)

Question

What are some examples of confidential information?

Answer

Confidential information can include:

- Source code
- Designs, inventions, and know-how
- Research and development information
- New product information and marketing plans
- Customer, partner and vendor details
- Customer data that we hold or process as part of our services
- Trends and projections
- Personally identifiable information and personal health information, including employee information
- Financial performance and target information
- Investment, acquisition, and divestment information

Keep Citrix intellectual property safe

Intellectual property is Citrix lifeblood. Keep it safe

Citrix intellectual property

It is essential to establish, protect and defend Citrix rights in its intellectual property due to its value to Citrix business. You must take steps to safeguard these assets regardless of whether they are labeled as proprietary or confidential or contain a copyright notice or other designation. Always understand and comply with any specific policies that apply to Citrix intellectual property and require its customers, vendors and partners to do so as well.

What is intellectual property?

Intellectual property includes trade secrets, *know-how*, patents, copyrights, trademarks and their embodiments, such as source code. See Citrix [Patents, Intellectual Property Policies & Guidelines](#)

Intellectual property rights of others

In addition to protecting its own intellectual property rights, Citrix also respects the intellectual property rights of others. Unauthorized use of third-party intellectual property may expose Citrix to potential liability. In many countries, theft and misappropriation of intellectual property also may result in criminal penalties for individuals.

Always remember:

- Do not directly or indirectly loan, copy, download, use or distribute third-party confidential information from customers, vendors, service providers, or partners or disclose it to any unauthorized person (including unauthorized Citrix employees and external individuals) unless you are doing so in accordance with the terms agreed between Citrix and the third party
- Do not incorporate third-party software (including open source software) into Citrix products unless you have been specifically authorized to do so. Consult Backstage for instructions on how to submit an open source request ticket and/or contact your Open Source Steward for more information
- Review and follow the terms and conditions of software license agreements (for example, provisions to not copy, reverse engineer or distribute programs)
- Use pre-approved creative content from the Brand Assets library whenever possible. Before using third-party images from external sources (including online websites like Creative Commons), contact the Legal team to obtain the appropriate permissions

Question

I am an engineer working on a feature for a Citrix product.

I came across an open source component developed by a third-party that I would like to incorporate into a Citrix product. What safeguards do I need to follow?

Answer

You need to get permission from your team lead or architect and then submit a formal request ticket to your Open Source Steward and Legal. Consult Backstage for instructions on how to submit a request ticket. If you have additional questions, contact your Open Source Steward and/or the Legal team.

Protect personal information

Always protect the privacy of our employees, customers, and partners.

As part of Citrix business, Citrix may collect and retain personal information about its employees and about its customers and partners and their employees, customers and vendors. Personal information includes any information relating to an identified or identifiable person, or that is linked or linkable to an individual. This can include information about a person's education, finances, employment or personal health. Common types of personal information include names, addresses, telephone numbers, Internet protocol addresses, dates of birth, social security and other identification numbers and credit card or bank account numbers.

As part of Citrix's commitment to privacy, and in order to comply with data protection laws, you must:

- Always maintain the confidentiality of any personal information encountered while working for Citrix
- Only access and use personal information to the extent necessary to perform your job
- Handle personal information in a manner that will avoid accidental loss or alteration or unauthorized access
- Never disclose personal information to anyone outside of Citrix without specific authorization from your manager and the local Legal representative in your region
- Follow Citrix [Records Retention Policy and Schedule](#) regarding data security to minimize use, collection, retention, loss or destruction of, or damage to, personal data

If you believe that personal information has been used, lost or disclosed without authorization, you should immediately alert your manager, the local Legal representative in your region or the [Legal Compliance Officer](#) or use the resources referred to in "Ask questions and raise concerns" at the end of this Code.

You should be aware that Citrix may monitor information systems, resources, and infrastructure to ensure compliance with corporate, regulatory or legal requirements. Citrix user information, data or communications stored on Citrix systems or networks is considered property of the company.

See Citrix [Privacy Policies & Guidelines](#) and the [Acceptable Use Policy](#)

Question

I am working with an independent contractor on a Citrix project. The contractor has asked me to email him certain information relevant to the project that includes residential addresses and dates of birth of certain Citrix employees. May I share the information with him?

Answer

No. Your manager and the local Legal representative in your region will need to approve the disclosure of the personal information before you can share it with the contractor. You will need to discuss with your manager and the local Legal representative in your region the business purpose behind the request and how the information will be transferred in order to minimize the risk of loss or unauthorized disclosure.

Dealing with customers and third parties

Conduct business the right way

Citrix business must always be conducted in an ethical, honest and fair manner

Tell the truth.

Never make oral or written misrepresentations, or dishonest or misleading statements, to anyone. This applies to all areas of Citrix business and all of its relationships, and it applies no matter where the oral or written misrepresentation is made.

Keep accurate and honest records.

Citrix is committed to providing complete, accurate and timely information, in all material respects, about the company's financial condition and business results. Citrix books and records must always accurately and fairly reflect all transactions. Always make sure that any documentation you submit or approve is complete, accurate, timely, and has the appropriate authorization and signatures. This includes customer orders, costs, sales, shipments, financial information, expense reports, time slips and all other important company information.

Never make or participate in false entries into Citrix business records.

Also remember:

- Only make commitments to customers and partners if you are authorized to do so
- All commitments to customers and agreements (oral and written) should be reviewed and approved in accordance with Citrix policy
- Never alter or dispose of company records contrary to Citrix policies and procedures

Obtain information appropriately.

To compete in the marketplace, it is often necessary to collect competitive information. Citrix does so lawfully and consistent with company policies on gathering such information. You may only gather information about other companies (including competitors) and business opportunities using appropriate methods.

Illegal practices such as trespassing, burglary, misrepresentation, wiretapping, and stealing are prohibited. Never solicit or knowingly accept confidential information from a competitor's employees, former employees, or customers.

Deal ethically with vendors.

It is essential that you deal ethically with all of Citrix vendors and strive to develop mutually beneficial relationships. The selection of vendors must always be based on objective factors such as price, quality, products or services offered, as well as the integrity and reputation of the vendor.

Citrix expectations of vendors

If Citrix learns that its vendors, contractors or consultants have acted in a manner inconsistent with Citrix ethical standards, Citrix will take appropriate action.

See Citrix [Anti-Trust Policy](#) and [Anti-Bribery Policy](#)

Question

I have heard a member of my team making misleading comments about a competitor's product to win a deal. What should I do?

Answer

All Citrix business must be conducted in an ethical and fair manner. We do not make dishonest or misleading statements to win business. You should discuss this matter with your manager, the local Legal representative in your region or the Legal Compliance Officer.

Make sure gifts and entertainment are appropriate

All entertainment, gifts and other benefits must be reasonable

Any gifts or entertainment must be legal, consistent with Citrix Values, and be tied to legitimate business purposes.

Giving gifts or providing entertainment is often a customary, common business practice, designed to legitimately strengthen business relationships. However, the Citrix community must take care to ensure that gifts and entertainment given to and received from current or prospective partners and customers and others are not excessive and cannot be misinterpreted as inappropriate. Some of Citrix customers and partners prohibit giving gifts of any kind or value (directly or indirectly) to their employees, and you are required to respect their policies.

Never give, request, or accept anything of value—particularly gifts, entertainment, or other benefits—which may influence (or appear to influence) the bona fide business relationship between you and another party.

You should also never give, offer, or accept any cash or cash equivalents (for example, gift cards or coupons).

Never use a third party (such as an outside consultant, reseller or agent) to avoid or get around these prohibitions.

Business entertainment provided and gifts given should also not exceed the bounds of good taste or customary business standards. Gifts and entertainment must be reasonable and be based on the expectation that they will become publicly known. Gifts, entertainment and other benefits must be properly recorded and accounted for in company financial records.

The same principles apply when you are offered or given gifts or entertainment. The Citrix community must always refrain from requesting, directly or indirectly, any gifts, entertainment, or other benefits from anyone with whom Citrix does or could do business.

A Citrix employee may refer customers to third party vendors, but must first obtain Citrix management authorization and cannot accept any fee, commission, or any other compensation for this activity from anyone except Citrix.

Offering gifts or entertainment to government officials is governed by a much more strict set of rules. See the next section for more information.

If you have any questions or concerns, you should always raise these with your manager, the local Legal representative in your region, the [Legal Compliance Officer](#) or use the resources referred to in “Ask questions and raise concerns” at the end of this Code.

See Citrix [Catering and Appreciation Policy](#) and [Anti-Bribery Policy](#)

Question

A vendor with whom you are renegotiating a contract has offered to host my team at a professional sporting event. Can I accept his offer?

Answer

Social events with partners are valuable relationship-building opportunities. However, you must never allow gifts or entertainment to influence your business judgment. Citrix employees are obligated to make business decisions that are in the best interest of Citrix. If the anticipated sporting event is modest and reasonable, you may accept his invitation. If the anticipated sporting event is more than routine, you should discuss the invitation with your manager and the local Legal representative in your region before accepting it. You need to make sure that the invitation is proper and does not reasonably appear to be an attempt by a third party to influence Citrix business decisions. Also, you should discuss with your manager and the local Legal representative in your region the specific circumstances surrounding the invitation—in this case, you are in the midst of negotiating a contract with the vendor.

Never bribe or offer inducements

Citrix does not allow bribes, kickbacks, or any other improper payments, regardless of local practices or competitive intensity

Laws and rules governing payments to government officials are complicated—what may be permissible with commercial customers may be illegal with government officials—and, in some cases, be a crime. Be aware that employees of companies with government ownership may be considered government officials.

Following these simple rules will help you deal with most situations:

Never offer, give, solicit, or accept any money or anything else of value for the purpose of:

- Obtaining, retaining, or directing business, or
- Bestowing or receiving any kind of favored treatment or inappropriate business advantage

Never use a third party (such as an outside consultant, reseller or agent) to avoid or get around this prohibition. For example, don't give money or anything of value to a third party if you have reason to think that it may be passed on to another third party such as a government official. Fees, commissions, and expenses paid to outside consultants, resellers, or third parties must be based on proper billings and reasonable standards for the services provided.

Always fully comply with anti-corruption laws where Citrix does business, including The Foreign Corrupt Practices Act (FCPA), which applies globally to Citrix and sets out prohibited activities when doing business with foreign government officials, and the UK Bribery Act.

Refrain from political contributions on behalf of Citrix. You should avoid personal political contributions that may create the appearance of a conflict of interest or an actual conflict of interest.

Employees working or travelling in certain countries on Citrix business may sometimes be told by foreign government officials or other persons that they must pay for certain privileges, services, or actions that would normally not cost anything. These types of payments, often known as facilitation payments, are not permitted.

See Citrix [Anti-Bribery Policy](#)

Question

One of Citrix resellers is known to be engaging in paying bribes to win business. What should I do?

Answer

Anti-corruption laws prohibit payments made either directly (by Citrix) or indirectly (by partners). If you are aware or think that any Citrix partner is engaged in any form of illegal activity including paying bribes of any kind, you should immediately report your concerns to the local Legal representative in your region or the Legal Compliance Officer or use the resources referred to in "Ask questions and raise concerns" at the end of this Code.

Important laws and regulations

Be careful when buying or selling company stock

Never use inside information to trade company stock

Insider trading and stock tipping are criminal offenses in many countries in which Citrix does business. Please familiarize yourself with specific Citrix policies that apply to these activities.

Inside information

Information about a company that is not known to the general public and that a typical investor would consider important in making a decision to buy, sell, or hold the company's stock. It may include information that something is likely to happen or even just that it may happen.

Insider trading or dealing

Insider trading or dealing means personally buying or selling stock of Citrix or any other company while in possession of inside information about Citrix or the other company.

Stock tipping

Stock tipping means disclosing inside information about Citrix or any other company—for example, to a relative, colleague, or friend—to enable the person to buy or sell stock of Citrix or of the other company on the basis of such information. Both the person who tips (the tipper) and the person who receives and later trades on the tip may be held liable. This includes any profits made, or losses avoided, as a result of the tip, as well as for monetary fines and penalties and other punishments.

You must always remember:

- Never disclose inside information to persons outside of Citrix, or to persons within Citrix who do not have a need to know, unless disclosure has been approved by the [Legal Compliance Officer](#) and is in the course of your job.
- It is illegal to trade in Citrix stock while in possession of inside information. You cannot trade until the information has been publicly disclosed. If you have any questions about whether it is safe to trade Citrix stock, you should ask the [Legal Compliance Officer](#) before trading.

See Citrix [Insider Trading Policy](#)

Question

I learned that Citrix is having a very good sales quarter and are expected to exceed our quarterly earnings guidance. Can I purchase shares of Citrix stock?

Answer

No. Unless Citrix has announced to the public that it expects to exceed its earnings guidance for the quarter, you may not buy or sell Citrix stock. The information you learned is inside information. You may only trade Citrix stock after an announcement is made to the public and after the public has had the opportunity to digest the information. If you have inside information, you, as well as your family, are prohibited from trading Citrix stock. Always check with the Legal Compliance Officer if you are considering executing a trade in these circumstances.

Respect international trade controls

Complex and highly regulated international trade controls apply to Citrix business

Many countries regulate international trade transactions, such as imports, exports, and international financial transactions, for a variety of reasons, including national security and foreign policy.

All of Citrix activities must fully comply with the trade control laws and regulations of the United States, as well as similar laws that apply in the countries in which Citrix does business.

In particular, export administration regulations restrict the export from the United States and the re-export from overseas of products that employ encryption functionality, including Citrix products with that functionality. These products may require review or licensing by the U.S. Department of Commerce prior to any export or re-export. These regulations also restrict the release of certain technology to non-U.S. persons, regardless of where release may take place.

Citrix products may also be subject to regulations that prohibit most transactions with certain designated countries, entities, and individuals.

You are responsible for understanding whether U.S. trade controls apply to transactions conducted by your business unit (including outside the United States). If you have any questions or concerns about the laws or regulations or how they might apply to your business unit, discuss this with the [Legal Compliance Officer](#).

See Citrix [Global Trade Compliance Guidelines](#)

Question

I have a potential sale with a customer in a country that may be subject to US or international trade restrictions. What should I do?

Answer

U.S. export controls classify certain nations as embargoed countries. As such, a sale to a customer located in an embargoed country would be a breach of federal export regulations and contrary to Citrix policy. To determine whether you indeed cannot proceed with the sale, seek confirmation by contacting the local Legal representative in your region or the Legal Compliance Officer.

Compete fairly at all times

Citrix is committed to free, fair, and open competition in the global marketplace

The Citrix community must comply with all laws that promote competition and avoid business activities or conduct that would unlawfully restrict competition. Antitrust, unfair competition, and trade regulation issues may arise in dealings with competitors, vendors, distributors, resellers, partners or customers.

When conducting Citrix business, be careful to avoid:

- Inappropriately sharing Citrix confidential information to gain a marketplace advantage
- Engaging in discussions with employees of competitors within trade associations, standard setting bodies, consortia and other industry organizations regarding costs, prices, terms of sale, territories, competitive bids or customers

While basic anti-trust and competition law principles apply worldwide, there are significant country and regional differences. If you have any questions or concerns about anti-trust or unfair competition issues, especially if you are doing Citrix business outside the U.S., discuss these with the [Legal Compliance Officer](#).

See Citrix [Anti-Trust Policy](#)

Question

At a recent trade association meeting, one of Citrix's competitors began volunteering information about its pricing trends. Should I pass this information along to marketing? Should I do anything else?

Answer

You should not pass this information to marketing or any other department. You should contact the local Legal representative in your region or the Legal Compliance Officer immediately to discuss the matter. If you find yourself in a meeting in which a competitor volunteers pricing strategy information again, you should leave the meeting immediately. The perception may be created that you are participating in a price-fixing scheme or other activity that restricts competition.

Ask questions and raise concerns

Question

My manager has asked me to do something that I think violates this Code. What should I do?

Answer

The first thing you should do is talk to your manager to make sure that there is not a misunderstanding and that he or she understands that you are concerned. If you are still concerned, you should raise the matter with your manager's manager, the local Legal representative in your region or use the resources referred to in "Ask questions and raise concerns" at the end of this Code.

Ask questions and raise concerns

Speak up and raise your concerns

The Citrix community has an obligation to ask questions or report concerns about possible violations of this Code, Citrix policies and laws. Because it's important that you feel comfortable when you ask questions and raise concerns, Citrix is committed to providing you with various ways to do this confidentially and anonymously, if you wish. Please note that some countries in which Citrix does business do not allow concerns to be reported anonymously.

Usually, you can raise the matter with your manager, and often this will be enough to resolve it. There may be situations in which you would prefer to, or feel it is necessary to, raise the matter with someone else, either because you are more comfortable doing so, the matter involves your manager, or you don't feel that your manager has understood or adequately dealt with the matter. Citrix understands that it is not always easy to be in this situation. It is important in those situations to always remember that there are a number of other options you have for voicing your concern.

If you are a manager, you have the additional responsibility to escalate concerns that you are aware of or that have been reported to you.

No retaliation

Citrix will not tolerate any retaliation or adverse action against you for raising or helping to resolve, in good faith, any concerns about possible violations of law, this Code, or Citrix policies. If you believe you are being retaliated against in any way, you should report it to one of the resources listed below.

Anyone who is found to have engaged in retaliation may be subject to discipline up to and including termination of employment or any other business relationship.

Here are the different ways that you can ask questions and raise concerns confidentially and anonymously, if you wish and if permitted in your country. You do not have to be certain that the Code of Business Conduct, a Citrix policy or a law or regulation has been violated before seeking assistance as long as you have a good faith concern. All of the below resources are provided to offer you guidance, to take your concerns seriously and to address the issues you bring to their attention.

Raise the matter with human resources.

Send an email to **ASKHR(US)@citrix.com** or call 1.800.4Citrix (1.800.424.8749) Extension 27547 if you are based in the United States.

Go to your local human resources manager if you are based outside of the United States.

Raise the matter with the local Legal representative for your region

Raise the matter with:

TonyGomes
General Counsel & Legal Compliance Officer
Tony.Gomes@citrix.com
1.781.203 4557

Use the Citrix online HelpLine reporting available at citrix.alertline.com.**

Call the Citrix toll-free HelpLine.**

- In the U.S. and Canada, please call 1.800.425.8109
- In Switzerland, please dial access code 0-800-890011, then enter 1.800.425.8109 when prompted
- In India, please dial access code 000-117, then enter 1.800.425.8109 when prompted
- In the United Kingdom, please dial one of the following access codes, then enter 1.800.425.8109: 0800-89-0011 (BT phone provider); 0500-89-0011 (Cable & Wireless provider)
- Additional international access codes may be found at www.business.att.com/bt/access.jsp. Dial the access code given, then enter 1.800.425.8109 when prompted

Send your matter to the Citrix postal HelpLine**

Global Compliance

13950 Ballantyne Corporate Place, Suite 300
Charlotte, North Carolina, 28277
United States of America

Citrix will investigate

Citrix will promptly investigate all matters reported on a case-by-case basis and will take reasonable steps to keep your identity confidential. In some cases, Citrix may report violations to regulators or law enforcement officials.

** Citrix's various HelpLine services are administered by Navex to ensure that you feel comfortable that you can raise a matter in a confidential way and anonymously, if you wish and if permitted in your country. Navex is a trusted third party who handles the initial receipt of any matters you raise. Their role is to act as a confidential intermediary between you and Citrix and to allow you to ask questions and raise concerns.



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