

PALO ALTO NETWORKS, INC. CONFLICT MINERALS POLICY

Palo Alto Networks, Inc. (the “Company”) believes in and supports international human rights, including in our supply chain. It is imperative to the Company that all of its suppliers uphold the same level of integrity and support for human rights wherever we do business around the globe.

Background. In 2012, the Securities and Exchange Commission (the “SEC”) adopted final rules regarding sourcing of conflict minerals (the “Conflict Mineral Rules”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”). The Conflict Mineral Rules require public companies to annually disclose information about whether the products they manufacture or contract to manufacture contain Conflict Minerals that originated in any “Covered Countries,” and, if so, information about the source and chain of custody of those Conflict Minerals. The “Conflict Minerals” for the purposes of the Conflict Minerals Rules are columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), and gold, and the U.S. Secretary of State may designate other minerals in the future. The “Covered Countries” for the purposes of the Conflict Minerals Rules are the Democratic Republic of the Congo (the “DRC”), the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. We support efforts to further the humanitarian goal of ending violent conflict in the DRC and in surrounding countries, which we understand has been partially financed by the exploitation and trade of Conflict Minerals.

Our Policy. We support the goal of the Dodd-Frank Act of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. We are committed to responsible sourcing of materials for our products from companies that share our values around international human rights, including the sourcing of Conflict Minerals, and we expect that our suppliers are likewise committed to responsible sourcing. We also support greater transparency with regard to the supply chain, in particular the sourcing of Conflict Minerals. Accordingly, we have adopted this Conflict Minerals Policy, and we expect that our suppliers will adopt a similar policy and meet our expectations set forth below.

Our Commitment. We are committed to complying with the Dodd-Frank Act and sourcing products from suppliers that share our values with regard to human rights, ethics, and social and environmental responsibility. In furtherance of our commitment, we:

- created a governance structure to operationalize this conflict minerals policy;
- communicated this policy with our third-party manufacturers and suppliers;
- engaged with our suppliers for training, data collection and verification to promote the use of Conflict Minerals from responsible sources in our products;
- developed a comprehensive due diligence process that is in line with the Organization for Economic Cooperation and Development (the “OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals From Conflict Affected and High-Risk Areas, that includes the adoption of Conflict-Free Sourcing Initiative tools and programs, such as the Conflict Minerals Reporting Template; and
- partnered with a third-party manufacturer who is a founding member of the Electronic Industry Citizenship Coalition.

Our Expectations for Suppliers.

Our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting and refining of Conflict Minerals. As a result, we expect that all of our suppliers will partner with us to support this policy. Furthermore, we expect our suppliers to:

- respond to our inquiries related to conflict minerals to ascertain the source of the conflict minerals being supplied to us and our third-party manufacturers;
- develop policies, procedures, due diligence processes and management systems consistent with the OECD guidelines that are reasonably designed to prevent products or materials that are not DRC Conflict Free from entering our supply chain and to provide transparency as to the source of any Conflict Minerals. For purpose of the Conflict Minerals Rules, “DRC Conflict Free” means that the product does not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries;
- undertake reasonable due diligence to determine if the specified metals are being sourced from certified conflict-free smelters validated as compliant to the Conflict-Free Smelter Program (the “CFS”) protocol, using the CFS Compliant Smelter List and, if not, to make deliberate progress towards doing so;
- to support industry efforts to enhance traceability and responsible practices throughout their supply chains.

We evaluate our relationship with our suppliers on an ongoing basis, and we reserve the right to evaluate the extent to which a supplier has failed to reasonably comply with this Conflict Minerals Policy. If we determine that a supplier’s efforts are deficient, we reserve the right to evaluate the supplier relationship and to take any appropriate action, including terminating our relationship with the supplier.

Nothing in this Conflict Minerals Policy is intended to in any way grant any additional rights or expectations to any of our suppliers, or in any way modify or otherwise limit our contractual or legal rights.

Additional Information. Our employees, suppliers and other interested parties may contact us regarding this Conflict Minerals Policy at: compliance@paloaltonetworks.com.

Changes to this Policy. The Company reserves the right to make changes to this policy at any time in its sole and absolute discretion.