



Code of Ethics and Business Conduct

October 23, 2025

Arista Networks

Dear Arista Employee:

Arista was founded on the principle of doing things the “Arista Way.” The Arista Way is to strive for customer success in every aspect of what we do. We build and deliver innovative, high-quality products and services through our commitment, innovation and uncompromising focus on the needs of our customers.

Most importantly, the “Arista Way” means always doing *the right thing*. Arista’s success is dependent upon our ability to conduct ourselves respectfully, ethically, honestly and in full compliance with our responsibilities under the law. This applies to everything we do, every decision we make, and with everyone with whom we interact—our customers, suppliers and business partners as well as with each other.

Although we operate in many regions and countries and are subject to many different rules, regulations, customs and practices, we can only succeed if we adhere to this common set of values and standards.

It is essential that we each recognize that we are responsible and accountable for understanding and meeting these standards. Our reputation and our success depend upon the personal commitment that each of us makes to uphold Arista’s values and practice ethical behavior in all of our business dealings.

Jayshree Ullal

Chief Executive Officer

Introduction

This Code of Ethics and Business Conduct (this “Code”) sets forth Arista’s standards of ethics and business conduct. It has been prepared to provide guidance in addressing the legal and ethical issues you may encounter while conducting Arista’s business. We use “Arista” or “our Company” throughout to refer to Arista Networks, Inc. and each of its subsidiaries.

Employment by Arista is subject to the terms and conditions established by your local organization. As part of those terms and conditions, you are also required to abide by the organization-wide standards set forth in this Code. This Code is not a contract, and no contract is implied. If any part of this Code conflicts with applicable law, the law will prevail. Arista may interpret this Code in its sole discretion.

Arista recognizes and respects regional and local legal differences in employment, privacy and other applicable laws. We will comply with regional and local requirements concerning the matters discussed in this Code, as appropriate, including those concerning the reporting of misconduct, employee monitoring, application of certain rules to temporary employees, and application of certain penalties.

This Code places Arista in the forefront of companies that emphasize the importance of honest business conduct and solid business ethics. We can meet these standards only with the support and cooperation of our employees, who are our most valuable asset.

Understanding this Code

As noted in the Introduction, this Code is meant to provide employees with guidance on how to address certain legal and/or ethical issues that may arise during their employment. The model questions and answers provided through this Code are meant to provide high-level guidance to common questions that might arise and should not be taken as the final answer on the particular subject. In all cases, employees should review those answers with their manager and/or Legal or Human Resources Departments (as applicable) before taking any actions or making any decisions.

Although we operate in many countries and are subject to many different rules, regulations, customs, and practices, we can only succeed if we adhere to a common set of values and standards.

It is therefore essential that we each recognize that we are responsible and accountable for understanding and meeting the standards described in this Code.

This Code starts with a summary of the core business values that are essential to Arista’s success. They are the foundation of all that we do, and we each are expected to adopt these values in our day-to-day business activities. Widespread adherence to these values will enhance our long-term success by improving our ability to serve customers, increasing our competitiveness, and promoting our pride in being part of the Arista team.

This Code then describes how we should interact with each other, with other companies and individuals, and with the

countries, cultures, and governments that make up the world in which we operate. Specifically, it addresses four areas:

Compliance

Our responsibility to abide by the laws, regulations, and Arista's policies that apply to our business in every country in which we operate.

Business Conduct

Our obligation to conduct internal and external business fairly and ethically.

Arista's Relationships

Our responsibility to interact fairly and respectfully with each other, our customers, our partners, our suppliers, and our host communities.

Enforcement

We are committed to conduct investigations in an ethical and legal manner, and to promote consistent disciplinary action for violations of our policies or business conduct standards.

Applicability of this Code

Employees and Directors

This Code applies to all personnel employed by or engaged to provide services to Arista, including, but not limited to, Arista's employees, officers, temporary employees, workers (including agency workers), agents, interns, consultants and independent contractors.

Non-employee directors are also subject to this Code in their capacity as members of the Arista Board of Directors, except that they are subject to the conflict-of-interest provisions of Arista's Corporate Governance Guidelines in lieu of the conflict-of-interest provisions contained in this Code.

Any waiver of any provision of this Code for a member of the Board or an executive officer must be approved in writing by the Board or its designated committee and

promptly disclosed along with the reasons for the waiver to the extent required by law or regulation. Any waiver of any provision of this Code with respect to any other employees must be approved in writing by the Chief Executive Officer, Chief Financial Officer or General Counsel.

A Summary of Arista Values

Certain core values comprise the foundation of our Company. The following values are essential to Arista and Arista's business:

Integrity

Arista employees demonstrate honesty and sound ethical behavior in all business transactions and personal integrity in all dealings with others.

Mutual Respect

Arista employees consistently treat individuals with respect and dignity.

Teamwork

Arista employees work together as a team for the collective interests of Arista.

Communication

Arista employees share information effectively with each other. We balance the need to share information alongside the need for confidentiality regarding certain information.

Innovation

Arista employees seek innovative and creative approaches to problem solving.

Customer Satisfaction

Arista employees consistently treat customer satisfaction as a top priority.

Quality

Arista employees make excellence and quality a part of their day-to-day work processes and seek continuous improvement in all that they do.

Fairness

Arista employees commit to dealing fairly with customers, suppliers, partners, and one another.

Compliance

Arista employees comply with all laws, regulations, and Arista's policies that govern Arista's business and employees' actions on behalf of Company.

Ethics

Arista employees observe the standards that have been established by Arista and act ethically in their approach to business decisions.

Compliance with Laws, Regulations and Arista's Policies

We must each operate within the boundaries of all laws, regulations, and internal policies applicable to Arista's business, wherever we conduct it. Where local laws are less restrictive than this Code, you must comply with this Code, even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than this Code, you must always, at a minimum, comply with those laws.

Arista expects its employees to:

- Act ethically and with integrity in all business dealings;
- Comply with the law, this Code, Arista's policies, and Arista business practices;
- Report known or suspected violations to their manager, the Legal Department or by using Arista's ethics violation hotline at www.arista.ethicspoint.com;
- Cooperate with compliance investigations; and

- Complete all mandatory compliance education courses and other compliance requirements in a timely manner.

Further, Arista expects its managers to:

- Promote and support ethical behavior and business practices that comply with this Code;
- Encourage employees to challenge and report unethical conduct or any other conduct that does not comply with this Code;
- Act as a leader demonstrating exemplary conduct modeling the principles set out in this Code;
- Ensure that employees who report to them directly or indirectly understand where and how to report violations of this Code;
- Ensure that employees who report to them directly or indirectly complete all mandatory compliance education courses and other Compliance and Ethics Program requirements in a timely manner;
- Maintain an "open door" policy with regard to employee questions, including those of business conduct and ethics, and ensure availability of resources and support for compliance, such as printed materials and relevant contact information; and
- Encourage open, honest, and confidential dialogue without retaliation.

From time to time, we may revise this Code, which will be available on the intranet site and our website. In addition, there are policies on the Arista intranet that cover many of the topics covered in this Code in more detail. If you have questions on how to interpret or comply with this Code, Arista's

policies, or applicable law, contact Arista's Legal Department.

Business Practices

Antitrust and Competition Laws

Typically, the countries in which Arista operates have laws and regulations that prohibit unlawful restraint of trade, usually referred to as antitrust or competition laws. These laws are designed to protect consumers and competitors against unfair business practices and to promote and protect healthy competition. Arista rigorously observes applicable antitrust or competition laws of all countries or organizations.

Antitrust or competition laws vary from country to country but, generally, such laws prohibit agreements or actions that reduce competition and harm consumers. Among those activities generally found to violate antitrust or competition laws are agreements and understandings among competitors to:

- Fix or control prices;
- Structure or orchestrate bids to direct a contract to a certain competitor or reseller ("bid rigging");
- Boycott specified suppliers or customers;
- Divide or allocate markets or customers; and
- Limit the production or sale of products or product lines.

Agreements of the type listed above are against public policy and are against Arista policy. Employees must never engage in discussions of such matters with representatives of other companies. You should report to Arista's Legal Department any instance in which other companies initiate such discussions.

Contracts or other arrangements that involve exclusive dealing, tie-in sales, price discrimination, and other terms of sale may

be unlawful under applicable antitrust or competition laws. You should not enter into such arrangements without the approval of Arista's Legal Department.

Q: Do these laws also prohibit unfair sales practices?

A: Yes. Unfair methods of competition and deceptive practices are also prohibited. Examples of these include:

- Making false or misleading representations about Arista's products;
- Falsely disparaging a competitor or its products; or
- Using another company's trademarks in a way that confuses the customer as to the source of a product.

Q: At a trade association meeting, you overhear an informal group of Arista competitors discussing future product pricing. May you join the conversation to gain some excellent competitive intelligence?

A: No. Arista is only interested in competing honestly and fairly. You must avoid all discussions and the exchange of information with competitors involving topics such as pricing, customer relationships, or market allocation, because they are, in fact, illegal. Disassociate yourself from any such discussions immediately and report the incident to your manager, Arista's Legal Department or via Arista's ethics violation hotline available at www.arista.ethicspoint.com.

As a general matter, when attending trade association meetings, always request a meeting agenda and do not participate in meetings that do not have a set agenda or where agendas appear improper or overly vague. If you have any questions about a meeting agenda, seek advice from Arista's Legal Department.

Because of the complexity of antitrust and competition laws, employees should seek advice from Arista's Legal Department on any related question.

Improper Payments

You are prohibited from receiving, offering, promising, authorizing, directing, or making any bribes, kickbacks, or payments of money or anything of value to obtain an improper business or any other advantage for Arista or yourself.

The above prohibition applies whether such payments go to:

- Government or public international organization employees or officials;
- Political parties or candidates for political office;
- Business entities partially or wholly owned by government interests;
- Privately held commercial companies;
- Arista employees; or
- Any other third party.

Arista strictly prohibits giving money, gifts or anything of value directly or indirectly to any person, whether they are a government official or work in the private sector, for the purpose of corruptly influencing them. This prohibition includes giving money, gifts or anything of value to any third party where it is likely to improperly influence that person or a third party to obtain or retain business for Arista, or to secure any improper advantage for Arista. Refer to the "Dealing with Government" section of this Code and Arista's Government Contract Code of Conduct and Arista's Anti-Corruption Policy (both of which can be found on our Company's intranet) for more information regarding government entities and government officials.

Compliance with U.S. Anti-boycott Laws

Arista does not participate in any economic boycott not sanctioned by the United States government. A boycott is the refusal of one person or group of persons to deal with other persons or nation states. Arista and its employees are prohibited from discriminating against or refusing to do business with a country that is the object of an unsanctioned boycott or nationals of the boycotted country. Additionally, Arista and its employees may not furnish information concerning Arista's, or any other person's, business relationships with a boycotted country or blacklisted company. If requested to supply any information, take any action, or refrain from taking any action to further, support or comply with the terms of an unsanctioned boycott of a country. Such questions or instructions may be oral or written and appear in RFPs, financial documents, contracts, purchase order, letter of credit or emails from channel partners or end users, or shipping documents. There may be a valid business reason for such questions. Immediately contact your manager, Arista's Legal Department, antiboycott@arista.com, or report the matter using Arista's ethics violation hotline available at www.arista.ethicspoint.com. Violations of U.S. Antiboycott laws carry grave consequences, including the potential revocation of export licenses, significant civil and criminal fines, and imprisonment. This policy is intended to ensure that we comply with foreign economic boycott laws of the United States.

Q: Arista received a Request for a Proposal (RFP) from a company. The customer's RFP states that the supplier (in this case Arista) may not have "persons of X origin" providing support for the project and that certification is required to confirm that goods shipped are not of "boycotted country X origin." Can Arista accept the RFP?

A: No. Pursuing this RFP may subject Arista to criminal and tax sanctions. It contains anti-boycott requests that are not allowed and potentially reportable to the U.S. government. It is Arista's policy to comply with anti-boycott provisions of U.S. law.

The employee receiving this RFP should immediately stop responding to the RFP and reach out to Arista's Legal Department or antiboycott@arista.com for advice on how to proceed.

Export Laws and Trade Sanctions

Arista is committed to complying with all applicable import, export, sanctions laws and trade regulations, both domestic and international. Arista takes pride in following the letter and spirit of the trade laws and regulations of the countries in which it and its partners operate. Our commitment is evidenced by our corporate policy, resources and support of senior leadership to ensure operations align with international laws and compliance standards.

Arista also expects that all employees, consultants, subsidiaries, affiliates, and business partners understand and comply with all applicable trade compliance laws that are relevant to their role.

As a US-headquartered company, Arista products, technology, technical data and software are subject to US export regulations. This includes:

- Physical items
- Items that are hand-carried
- Samples / demonstrations
- Software / Software license keys
- Written, electronic, or oral disclosure of source code, technology or technical data

You are responsible for understanding how export controls and sanctions laws apply to your role. This includes the physical movement of goods and the electronic

transfer of technology or technical data. Any employee, consultant, subsidiary, affiliate or business partner who learns of business situations having the appearance of not complying with trade compliance laws must promptly report the matter to their supervisor, the Arista Trade Compliance Team or the Arista Legal Department.

Q: Are there any export restrictions on disclosing technical information to foreign nationals visiting Arista in the U.S.?

A: Yes. As a general rule, any oral or written disclosure of controlled technology including proprietary technical information via email, phone call, video calls, file sharing, or in person meetings, to a non-U.S. visitor is considered an export.

Q: Is a software download considered an export?

A: Yes. An export occurs when software is made available for download by someone outside of the United States. Proper export authorization must be obtained before making software available for recipients outside of the United States.

Q: Is Arista expected to "know" its customers?

A: Yes. Restricted party screening is one of the most important aspects of export compliance. Governments issue lists of denied individuals or entities that are prohibited from receiving certain hardware, software or technical data. Knowing our customers also helps prevent diversion of Arista products to sanctioned parties or embargoed countries. This protects Arista against possible violations of export control regulations.

Fair Dealing

Arista requires its employees to compete fairly and ethically for all business opportunities. You should endeavor to deal fairly with Arista's customers, service providers, suppliers, competitors, business

partners and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practices.

Immigration Laws

You must ensure that you, and any employees who work for you, comply with all applicable immigration laws and the advice of Arista's Legal Department or immigration service providers. Arista employees who travel internationally on business are responsible for obtaining appropriate visa and work authorizations before attempting to enter a host country. Visa and work permit requirements apply to all Arista employees who travel outside of their home countries for business purposes or who work on international projects or assignments outside of their home country for any duration. Moreover, Arista prohibits its employees from knowingly allowing contractors or other employees to work on a project without the proper authorization or documentation.

Securities and Insider Trading

Arista expects all of its employees to comply fully with applicable insider trading and securities laws.

Insider trading and securities laws provide substantial civil and criminal penalties for individuals who fail to comply. If you trade in Arista securities or the securities of any other company trading on any stock exchange, you are subject to United States securities laws, any other securities or insider trading laws that may apply to you locally, and Arista's Insider Trading Policy. Arista's Insider Trading Policy is available on our Company's intranet.

Securities include stocks, bonds, stock options, futures, derivatives and other financial instruments.

Arista employees who possess material, non-public information gained through their work at Arista may not trade in Arista securities or the securities of another company to which the information pertains. Employees may not engage in any other action to take advantage of or pass on to others (i.e., "tip") material non-public information before its release to the public at large and for a period of time after it is publicly disclosed. These restrictions also apply to spouses and family members of Arista employees.

Material information means information that a reasonable investor would be substantially likely to consider important in deciding whether to buy, hold or sell securities of Arista or view as significantly altering the total mix of information available in the marketplace about Arista as an issuer of such securities. In general, any information that could reasonably be expected to affect the market price of a security is likely to be material. Either positive or negative information may be material.

Such information may include financial performance or significant changes in financial performance or liquidity (including forecasts); potential or ongoing major mergers, acquisitions, joint ventures, or divestitures; award or cancellation of a major contract; changes in key management; changes in auditors, knowledge of a qualification in an auditor's opinion or report or any change in the ability to rely on prior auditor reports; data breaches or other cybersecurity events, actual or threatened litigation or investigations; and gain or loss of a substantial customer or supplier.

Q: Through my job at Arista, I have become aware of non-public financial information received from one of Arista's customers that indicates the customer is in better financial condition than most people realize. I wish to purchase the customer's stock. May I do so?

A: No. The customer may have provided this information in trust to help Arista determine how to best meet the customer's needs. Using this information for personal purposes or disclosing it to others is a violation of that trust, a violation of Arista's Insider Trading Policy, and may be a violation of applicable insider trading and securities laws. Accordingly, you should not purchase this stock until after the financial information has been made known to the public and disseminated broadly in the financial markets.

Q: I understand why I shouldn't reveal inside information to an outsider, but may I discuss this type of information with members of my immediate family? What about other Arista employees who are not aware of the same information I am?

A: No. You should be careful about inadvertently or casually revealing material inside information about Arista or any other company to your family or any person who doesn't have a legitimate business need to know it.

If members of your family trade in securities while in possession of material inside information that you have revealed to them about Arista, you may be exposing them and yourself to criminal and civil liability, even if you do not take advantage of this information personally.

If you become aware of, or suspect, a violation of Arista's Insider Trading Policy, please report the matter using Arista's ethics violation hotline available at www.arista.ethicspoint.com.

General Contracting Issues

Employees involved in the sale or licensing of products/services, the negotiation of agreements, or the delivery of services to customers are expected to understand and honor the terms of Arista's contractual agreements. In addition, each employee

must ensure that all statements, communications, and representations to customers are accurate and truthful. Arista is committed to complying with all of its contractual obligations.

You must obtain all appropriate approvals before executing, modifying, or amending any contracts. Arista prohibits unauthorized contracts or modifications of contracts, including "side letters" or oral agreements.

Only certain Arista employees have authority to sign contracts on Arista's behalf, commit Arista to acquiring products or services, or obligate Arista to third parties. More information may be found in Arista's Signature Authority Policy and Government Contract Code of Conduct which are available on our Company's intranet.

Before acquiring any goods or services or making any other commitments on behalf of Arista, you must ensure that you have spending authority equal to or greater than the total amount of payments to which you are committing Arista. You should aggregate the total cost of a purchase when making this determination. It is not permissible, for example, to open several purchase requisitions for a single vendor on the same project to avoid going outside the limits of your spending authority. If you do not have adequate spending authority, obtain approval from the manager in your chain of management who does. If you have questions about your spending authority, consult your manager.

Before signing any document committing Arista to acquire goods or services or undertaking any other obligation, you must ensure that you have the required signing authority. Only certain Arista individuals have the authority to sign documents on behalf of Arista and its subsidiaries. Consult this policy if you have questions about your signing authority or who should sign a particular

document. Contact your manager or Arista's Legal Department if you have any questions.

Q: A customer asks you to write a letter confirming that it is entitled to use its software in a way that is not expressly allowed by the Arista license agreement. You note that the Arista license agreement does not expressly prohibit the use intended by the customer, and you are certain that Arista would not object. May you write the letter or otherwise agree to the customer's request?

A: No. Arista may be willing to modify the contract to allow the use desired by your customer, but such a change to the contract requires the necessary business review and approval. Treat the request as one for a formal contract amendment and process the request in compliance with Arista's Business Practices guidelines.

Q: Your customer is ready to sign the contract, but it needs board approval. The customer assures you that its board will approve the transaction when it meets in ten days and asks you to allow it 15 days within which to return the order in the unlikely event that the board does not approve. May you send a letter confirming that the customer has 15 days to return the product or otherwise agree to the extended deadline?

A: No. This would constitute an unauthorized "side letter" or oral agreement modifying the terms of the contract. Execution of unapproved side letters or analogous oral agreements is grounds for disciplinary action, including termination.

Q: A partner asks for your assistance in obtaining a higher, non-standard discount in an upcoming significant order with a major customer. It is your understanding that the customer has already agreed on the price and terms of the agreement, but the partner now tells you, with no additional justification, that he needs this additional discount to place the order before the end of the quarter.

Should you help the partner obtain this nonstandard discount?

A: No. Arista employees are prohibited from enabling partners to achieve excess margins from unapproved non-standard discounts. In addition, enabling a partner order to be placed with Arista without the existence of a valid end user contract (also known as "pre-loading" or "channel stuffing") would be against Arista business practices and prohibited in this case.

Dealing with Government

Government Contracting

Arista strictly observes the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with government. The penalties for failing to adhere to these laws are severe and include substantial civil and criminal fines and imprisonment, and Arista could be prohibited from doing business with the government. Arista employees who deal with any governmental agency, including international organizations, are responsible for learning and complying with all rules that apply to government contracting and interactions with government officials. More information may be found in Arista's Government Contract Code of Conduct which is available on our Company's intranet.

Q: Are regulations regarding government employee interaction with private contractors, such as Arista, the same for all government agencies?

A: No. Regulations vary depending on the government agency. Because these regulations vary so greatly, seek advice from Arista's Legal Department if you are uncertain about the applicable regulations.

Procurement Integrity

No Arista employee shall attempt to obtain, from any source, any of the following information:

- Procurement-sensitive government information;
- Confidential internal government information, such as pre-award, source selection information; or
- Proprietary information of a competitor, including, for example, bid or proposal information, during the course of a procurement or in any other circumstances where there is reason to believe the release of such information is unauthorized.

If such information is inadvertently communicated to you by another Arista employee, or a vendor, a consultant, or a government employee, you should promptly contact your manager, Arista's Legal Department or report the matter using Arista's ethics violation hotline available at www.arista.ethicspoint.com.

Arista employees must strictly observe all laws and regulations regarding classified information.

Q: One of our government contracts requires us to perform a test that seems to duplicate part of another test we must perform during a later stage of production. It is clearly a waste of time and money. Must we continue performing the extra test?

A: Yes. Since the contract requires that we perform both tests, no change in testing requirements or quality controls should be made without first informing and obtaining the approval of the appropriate level of management, as well as the approval of the government contracting officer. To knowingly deliver a product to the government that does not meet the contract specifications, without specific prior approval from the customer for any change in specification,

could be considered fraud and a violation of law.

Q: Is it permissible for an Arista employee or independent contractor to obtain information on the prices a competitor plans to bid or has bid on a government procurement?

A: No. It is not permissible for Arista to obtain any information that another party considers proprietary or confidential regarding competitive procurement, including information about pricing. However, Arista may consider information about a competitor's prices that it obtained from publicly available sources.

Organizational Conflict of Interest (OCI)

Arista employees must ensure that in performing government contracts there is no actual or potential organizational conflict of interest (OCI) that would provide Arista unequal access to non-public information or an unfair advantage in a competitive procurement, or impair the objectivity of Arista employees in providing assistance or advice to the government or in performing contract work for the government; or, to the extent there is any actual or potential OCI, that any such actual or potential OCI is addressed through an appropriate OCI mitigation plan.

Q: An employee of a government customer has asked me to help him develop a specification to be included in a Request for Proposal. May I help him do this?

A: No. You should not perform this type of work unless you have obtained approval from Arista's Legal Department or other appropriate internal approvals.

Post-Government Employment Restrictions

Various laws impose requirements and restrictions on government employees and private companies related to discussions regarding post-government employment in

the private sector. In addition, these laws restrict the former government employee's activities after he or she leaves the government and accepts employment with a private company. Before engaging in any discussions related to possible employment or entering a business opportunity with a current or former government employee, you must obtain approval from Arista's Legal Department.

Q: You are considering hiring a former U.S. government engineer to work at Arista who is very qualified for the position. May you hire this engineer?

A: It depends. United States law imposes several restrictions on Arista's ability to hire U.S. government employees. State and local laws may impose similar restrictions. Before speaking with, much less hiring, any ex-government employee about employment opportunities at Arista, consult with Arista's Legal Department to ensure compliance with applicable laws.

Anti-Corruption

No one on behalf of Arista shall give or offer, directly or indirectly, anything of value as a bribe or other improper inducement to a government official or to any other person in order to obtain or maintain business or any other advantage.

It is a violation of the U.S. Foreign Corrupt Practices Act (FCPA) and other similar anti-corruption laws to engage in any form of bribery. Penalties for violating the FCPA and other anticorruption laws are severe and can include large fines and imprisonment.

Bona fide meal, entertainment and travel expenses may be paid, and gifts provided, only if done so without corrupt intent and only in compliance with Arista's Travel and Expense Reimbursement Policy and its Anti-Corruption Policy, which provide specific guidelines to ensure that Arista and its employees operate in compliance with applicable accounting and anti-corruption

laws, including the FCPA. Both the Travel and Expense Reimbursement Policy and Anti-Corruption Policy can be found on Arista's intranet.

Address questions or requests for information about Arista's Anti-Corruption Policy, the FCPA, or other anti-corruption laws to Arista's Legal Department.

If you suspect a violation of this policy has occurred, contact Arista's Legal Department or submit a report using Arista's ethics violation hotline available at www.arista.ethicspoint.com.

Q: A government "consultant" offers to assist an Arista salesperson in securing an important government deal in exchange for a success fee of 10% of the value of the government contract. Can the employee agree to this payment?

A: Arista employees are prohibited from making any agreements to pay fees of any sort to a third party unless such agreements are in writing and approved through the contracting process described under "General Contracting Issues" above. In addition, Arista policy prohibits the payment of success fees (which could be used to conceal a bribe) or utilizing unapproved or ad hoc consultants because of the increased anti-corruption risk they can create.

Gifts, Meals, and Entertainment

Government employees and international organizations generally are governed by laws and regulations concerning their acceptance of entertainment, meals, gifts, gratuities, and other things of value from firms and persons with whom those departments and agencies do business or over whom they have regulatory authority. In dealing with employees of government agencies and departments, it is Arista's general policy that nothing of value will be given to such individuals, unless one of the limited exceptions that are set forth in Arista's Anti-Corruption Policy is applicable. Private

sector companies also often have policies that apply to their employees accepting such items. Offering business courtesies to employees of private sector companies is discussed in more detail below in the section titled “Business Conduct: Business Courtesies You May Extend” and in Arista’s Travel and Expense Reimbursement Policy which is available on Arista’s intranet. If you have any questions, contact Arista’s Legal Department.

Q: A high-level group of government officials is making a goodwill tour of Arista facilities. I wish to give them a memento of the visit with an Arista logo. Is this against Arista’s policy?

A: It depends. Arista’s policy prohibits giving anything of value to government employees unless applicable law and Arista’s policy permit it. Although giving a government official an item of nominal value with Arista’s logo on it is generally permitted, some government officials are prohibited from accepting any items regardless of value. Additional guidance is available in Arista’s Anti-Corruption Policy. See, also, the section “Business Courtesies You May Extend” or contact Arista’s Legal Department for guidance.

Q: A high-level Arista employee meets with a high-ranking local government official to discuss Arista’s plans to open a shared service center. In appreciation, the government official offers the employee a gift of substantial monetary value. Can the employee accept the gift?

A: No. Arista employees generally may only accept unsolicited gifts or other business courtesies provided they are not of material value and are not given with the purpose of influencing one’s judgment. It is never appropriate to solicit gifts or other courtesies directly or indirectly.

If an employee is offered a gift or other business courtesy of material value from an individual, firm, or representative of a firm

who has or seeks a business relationship with Arista, the employee should politely return such material gifts with a note that explains Arista’s policy. For additional guidance, refer to the section “Business Courtesies You May Receive” or contact Arista’s Legal Department.

Lobbying of Government Officials

Our interactions with the government are generally governed by lobbying laws and regulations. Lobbying is any activity that attempts to influence laws, regulations, policies, and rules, but in certain jurisdictions can also cover procurement and business development activity. These laws can apply to elected officials as well as appointed officials and career government employees. Arista may have an obligation to register and/or report its lobbying activities under applicable law. These include activities by employees and outside consultants or advisors on government relations. Employees are responsible for knowing when their activities may be considered lobbying on Arista’s behalf and should consult with Arista’s Legal Department for guidance.

Political Contributions

Arista’s policy is to make no political contributions. Laws about political contributions vary greatly among jurisdictions and countries and are, in many cases, subject to interpretation and circumstance.

Some campaign laws interpret use of corporate resources (e.g., equipment, email, stationery, or employees) as corporate donations. You must therefore obtain approval from Arista’s Legal Department before using any our Company’s resources for political campaigns or fundraising.

Personal Political Activity

Arista encourages employees to participate personally in civic affairs and the political

process. However, all Arista employees must:

- Make all personal political contributions with their own money;
- Conduct any personal political activities on their own personal time (provided that Arista acknowledges that certain employees may be eligible to take time off of work for certain political activities);
- Conduct all personal political activities in accordance with applicable laws; and
- Comply with Arista's policies.

The following are guidelines regarding personal political activity:

- Your personal contributions to a candidate for elective office or a political party must not be – or appear to be – made with, reimbursed from, or facilitated by Arista's funds or assets;
- You will not be paid by Arista for any time spent running for public office, serving as an elected official, campaigning for a political candidate, or attending political fundraisers unless required by law;
- You may not use or permit any campaign, candidate, or political party to use any Arista facility or property, including any of the Company's trademarks, without written approval from Arista's Legal Department; and
- Arista requires the prior approval of Arista's Legal Department before an employee may engage in any overt, visible, or partisan political activity that could cause someone to believe that your actions represent Arista's political view(s) or position(s).

Nothing in this section or elsewhere in this Code is intended to, or does actually, limit employees' rights under Section 7 of the National Labor Relations Act (or otherwise impairs employees from assisting other Company employees and/or former employees in the exercise of their rights under Section 7 of the National Labor Relations Act).

Influencing Others

You may not use your position to coerce nor pressure other employees to make political contributions or support candidates or political causes. You may not use your position of authority to make another employee feel compelled or pressured to:

- Work for or on behalf of any legislation, candidate, political party, or committee;
- Make contributions for any political purpose; or
- Cast a vote one way or another.

Q: My manager asked me to make a contribution to his son's campaign for city council. Is that appropriate?

A: No. Even if your manager is not pressuring you, the request is inappropriate. If you are not comfortable speaking to your manager about this, speak with his or her manager, Arista's Human Resources Department, or Arista's Legal Department.

Public Service

Arista encourages employees to be active in the civic life of their communities. However, such service may, at times, place you in a situation that poses a conflict of interest with Arista. Board or committee members may, for example, be confronted with a decision that involves Arista. It might be a decision to purchase Arista equipment or services, or it might be a decision by a board of tax assessors or a zoning board that affects Arista property. In such circumstances, your interest in Arista and your obligation to the

civic organization might pull you in opposite directions and create a conflict of interest or the appearance of a conflict. Accordingly, you must take appropriate steps to resolve the conflict or the appearance of a conflict, including possibly withdrawing from any community or civic activity that involves any decision related to Arista. If you have any questions whether your community or civic activity may create a conflict of interest with Arista or even the appearance of a conflict, you should contact Arista's Human Resources Department regarding your participation.

Intellectual Property and Information Technology Security

Besides its people, Arista's most important assets are its intellectual property rights, including its copyrights, patents, trademarks and trade secrets. We are each responsible for protecting Arista's intellectual property rights by complying with Arista's policies and procedures for their protection. Maintaining the confidentiality of Arista's trade secrets and proprietary information is an important element of such protection.

We also respect the intellectual property, including the confidential and proprietary data, of others. As Arista receives and handles more confidential information of our customers, including personal data or personally identifiable information, it is important that such data is handled appropriately.

Arista will provide all software necessary for employees to perform their functions under appropriate licensing agreements with vendors. It is against Arista's policy to use, copy, display, or distribute third party copyrighted software, documentation, or other materials without permission. You are not permitted to use software or

documentation except to the extent that applicable license agreements allow.

Consult Arista's Legal Department for relevant policies and guidelines, including:

- Information Protection Policy;
- Privacy Policy;
- Data Retention Policy;
- Employee Proprietary Information Agreement; and
- Copyright Compliance Policy.

Additionally, the Information Technology and Information Security teams make policies available on our Company's intranet. All employees must comply with all applicable policies relating to these matters.

Q: I am working with an outside consultant on an Arista project, and he needs access to the Arista network to complete his work. May I share my user ID and password with him?

A: No. Arista employees may not allow third parties to access Arista computer systems without appropriate authorization. Moreover, you should safeguard your passwords to Arista systems, change them regularly, and not disclose them to any other person. Follow Arista's Network Access Policy to obtain authorization for this consultant and be sure that you have completed all necessary paperwork and obtained all necessary approvals for retention of an outside consultant.

Q: I often work from home or at a customer site, and I need access to my Arista email. May I forward my Arista email to my personal email account with a third-party ISP so that I may access my email at home?

A: No. You may not auto-forward your Arista email to a personal email account outside the Arista domain without approval from Arista Information Security. Auto-forwarding your email would allow Arista's confidential

information to pass outside the Arista network and be accessible by third parties.

Business Conduct

Financial and Other Records

As a public company in the U.S., we are subject to reporting requirements imposed by the U.S. Securities Exchange Act of 1934, as amended and New York Stock Exchange regulations. As a result, we are required to follow strict accounting principles and standards, to report financial information accurately and completely in accordance with these principles and standards, and to have appropriate internal controls and procedures to ensure that our accounting and financial reporting complies with applicable U.S. law and generally accepted accounting principles. The integrity of our financial transactions and records is critical to the operation of our business and is a key factor in maintaining the confidence and trust of our employees, security holders and other stakeholders. Arista employees are responsible for the accurate and complete reporting of financial information within their respective areas and for the timely notification to senior management of financial and non-financial information that may be material to Arista to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that Arista files with government agencies or releases to the general public.

Each employee involved in Arista's disclosure process must familiarize themselves with the disclosure requirements applicable to Arista and the business and financial operations of Arista, and must not knowingly misrepresent, or cause others to misrepresent, facts about Arista to others, whether within or outside Arista, including to Arista's independent auditors, governmental regulators and self-regulatory organizations.

Intentional Misconduct

You may not intentionally misrepresent Arista's financial performance or otherwise intentionally compromise the integrity of Arista's reports, records, policies and procedures. For example, you may not:

- Report information or enter information in Arista's books, records or reports that fraudulently or intentionally hides, misrepresents or disguises the true nature of any financial or non-financial transaction or result;
- Establish any undisclosed or unrecorded fund, account, asset or liability for any improper purpose;
- Enter into any transaction or agreement that accelerates, postpones or otherwise manipulates the accurate and timely recording of revenues or expenses;
- Intentionally misclassify transactions as to accounts, business units or accounting periods; or
- Knowingly assist others in any of the above.

It is important that all transactions are properly recorded, classified and summarized in our financial statements, books and records in accordance with our policies, controls and procedures, as well as all generally accepted accounting principles, standards, laws, rules and regulations for accounting and financial reporting. If you have responsibility for or any involvement in financial reporting or accounting, you should have an appropriate understanding of, and you should seek in good faith to adhere to, relevant accounting and financial reporting principles, standards, laws, rules and regulations and Arista's financial and accounting policies, controls and procedures. This includes ensuring that all bookkeeping and records comply with the

U.S. Foreign Corrupt Practices Act where applicable as well as applicable laws in other countries. If you are a senior officer or director level employee or above, you should seek to ensure that the internal controls and procedures in your business area are in place, understood and followed. No false entries shall be made on Arista's books or records for any reason. Below are some helpful guidelines regarding financial record keeping:

- Billing of time or expenses by consultants, entry of orders by sales administrators, and submission of travel and expense reports shall be made timely and accurately and in compliance with Arista's policy, professional standards, regulations, and laws;
- No documents shall be inappropriately altered, nor shall they be signed by those lacking proper authority;
- Arista funds or assets shall not be used for any unethical, inappropriate, illegal purpose or in a manner that violates Arista's policies. The handling and disbursement of funds related to an Arista transaction must be pursuant to an authorized Arista written contract and in accordance with clearly defined procedures;
- No undisclosed nor unrecorded fund nor asset related to any Arista transaction shall be established or maintained for any purpose; and
- No payment on behalf of Arista shall be made or approved with the understanding that it will or might be used for something other than the stated purpose.

Dealing with Auditors

Our auditors have a duty to review our records in a fair and accurate manner. You

are expected to cooperate with independent and internal auditors in good faith and in accordance with law. In addition, you must not fraudulently induce or influence, coerce, manipulate or mislead our independent or internal auditors regarding financial records, processes, controls or procedures or other matters relevant to their engagement. You may not engage, directly or indirectly, any outside auditors to perform any audit, audit-related, tax or other services, including consulting, without written approval from Arista's Legal Department.

Q: Your customer signed and returned an order form but inadvertently forgot to sign one of the attachments. Now he has left town for vacation. May you sign on behalf of the customer and process the order?

A: No. Altering documents or signing them on behalf of a third party without proper authority is against Arista's policies. Return the order form and attachment to the customer for signature.

Data Retention

Arista's Data Retention Policy ("Retention Policy") sets forth the guidelines governing the retention and disposal of Arista business records.

The Retention Policy requires that you maintain records in accordance with the schedule specified in the policy ("Retention Schedule"). The Retention Schedule identifies the Arista records that we must retain and the retention period for each record type. You are responsible for reading and abiding by the Retention Policy and Retention Schedule. You can access the Retention Policy and Retention Schedule through Arista's intranet under Arista's IT or Legal Department pages.

The Retention Policy and the Retention Schedule cover both electronic and hard copy materials. They apply to ALL record types regardless of the medium in which they exist, including:

- Paper;
- Email;
- Video;
- Hard drive; and
- Compact disc or other electronic or cloud storage device.

You should give special care to ensure that records containing confidential information are retained and disposed of in accordance with both the Retention Policy and the Information Protection Policy.

Q: During the course of your job, you come across some invoices that are two months old. All were marked paid and the files are taking up valuable space. Can you shred them to make room for more recent information?

A: No. Records such as invoices represent expenses, have to be reported, reviewed, and audited consistent with Arista's policies and reporting requirements. Please see the Retention Schedule for guidance on how long to keep the invoices.

Q: The accounting department receives a letter from a customer's attorney, demanding that Arista fulfill certain oral promises that Arista allegedly made. Your manager asks you to review your email to determine whether you have any email messages that would support such a promise. You identify one email that could be construed as constituting a promise, but you believe, in good faith, that no such promise was ever made to the customer. Should you delete the email?

A: No. Arista's Records Retention Policy requires employees to preserve all records that may be relevant to a matter in which Arista reasonably anticipates litigation. You should immediately notify Arista's Legal Department of the email and take steps to ensure that all relevant emails and other documents are preserved.

If you have questions about the Retention Policy or the Retention Schedule, contact Arista's Legal department.

Business Courtesies You May Extend

Furnishing meals, refreshments, entertainment, and event access in conjunction with business discussions with non-government employees is a commonly accepted practice. You may do so when it is appropriate to the circumstances. Such practices, however, must not violate the standards of conduct of the recipient's organization, any contractual agreement with a customer, Arista's Travel and Expense Policy, Arista's Government Contract Code of Conduct or Arista's Anti-Corruption Policy. You are responsible for familiarizing yourself with any such standards, agreements, and policies and for complying with them and should consult with Arista's Legal Department if there are any questions.

Arista prohibits giving anything of value (including charitable donations or sponsorship of events) directly or indirectly to any private individual, firm, or entity as a means of improperly inducing business. Employees who make, facilitate, and/or approve expenditures for meals, refreshments, or entertainment must use discretion and care to ensure that such expenditures are in the ordinary and proper course of business and could not reasonably be construed as improper inducement. Refer to Arista's Anti-Corruption Policy or contact Arista's Legal Department if you have any questions about your activities and interactions with private sector counterparts.

Arista's standards and the applicable laws for dealing with government employees and officials are more stringent than standards for commercial company employees. In the US, it is generally prohibited to provide anything valued more than \$20 per occasion or \$50 in one year to federal government

employees and officials, including meals. Nothing of value should ever be promised, offered or provided to a government employee, either directly or indirectly, in an attempt to influence the government employee in any way. In addition, you need to obtain prior written approval before inviting any government guest when Arista is to pay for any portion of the government guest's hotel accommodations or other travel expenses. This is further covered in Arista's Anti-Corruption Policy. You are responsible for being familiar with the rules and regulations of the government agencies and departments with which you interact. Contact Arista's Legal Department if you have any questions about your activities and interactions with the government.

Q: A commercial customer with whom I do business occasionally visits our facility. May I buy lunch?

A: Yes, you may buy lunch, as long as the expenditures are reasonable considering the business relationship involved and this does not violate any of the customer's regulations, any contractual obligations between the customer and Arista or Arista's Anti-Corruption Policy. Remember, the rule is not the same for government employees or officials, even if they are existing customers. Our general policy is that nothing of value can be given to government employees or officials, including meals, without prior written approval.

Business Courtesies You May Receive

Arista employees generally may accept unsolicited gifts or other business courtesies from actual or potential customers, suppliers, or other business partners provided they are not of material value, are not given with the purpose of influencing one's judgment and comply with the guidance below. It is never appropriate to solicit gifts or other courtesies directly or indirectly. If you are offered a gift

or other business courtesy from an individual or representative of a firm who has or seeks a business relationship with Arista, you must ensure that the gift could not be construed as an attempt by the offering party to secure favorable treatment. Contact Arista's Legal Department if you have any questions about any gifts or other business courtesies received.

Gifts

Arista limits the maximum value of gifts to Arista employees and their family members to \$500 per source, per year, subject to compliance with Arista's Travel & Expense Reimbursement Policy. The following type of gifts are inappropriate and are not permissible under any circumstance:

- Cash, gift cards or cash equivalents;
- Anything that is illegal, unsavory, offensive, or would embarrass Arista or the person or firm making the gift;
- Anything that is done as part of an agreement to do something in return (quid pro quo);
- Neither you nor any member of your family may accept any loan, guarantee of loan, or payment from a firm or an individual doing or seeking business with Arista. Exceptions to this include only loans from recognized banks and financial institutions that are generally available at market rates and terms; and
- You may not accept finder's fees, referral fees, or other incentive payment from third parties to whom Arista may refer business, including Arista partners and leasing companies.

Q: May I accept travel expenses to attend or speak to a user group or professional meeting?

A: It depends. Arista's policy requires that all suppliers be treated fairly and impartially. Therefore, you should accept nothing from a supplier that could give even the appearance of favoritism. However, you can more readily accept reimbursement for expenses from associations and professional groups because such organizations are generally not comprised of vendors who might be using a speaking invitation as a device to secure favorable treatment. If there is any question as to the acceptability of these benefits, contact Arista's Legal Department.

Q: A consulting client has asked if it can pay cash bonuses directly to our employees. Is this allowed?

A: No. Bonuses from a client to Arista employees or consultants are not allowed under Arista's policy.

Q: If a representative of a supplier, vendor, or customer presents me with a pencil set with the supplier's logo as a token of appreciation, may I accept it?

A: It depends. If the item has a retail value that is below the gift limits set forth above, you may keep it for your personal use. If the item does not meet these criteria and if you have not received the requisite approval, politely return it to the donor.

Q: It is the holiday season and I have just received from a vendor, at home, a gift certificate worth the equivalent of U.S. \$800 for a local department store. May I keep the gift certificate?

A: No. You may receive only gifts that are not of material value. Cash or equivalent gifts are not acceptable under Arista's Gift Policy and Arista limits gifts to a maximum of \$500 per source per year. You should return the gift certificate immediately, explaining that Arista's policy does not allow you to accept such a gift.

Q: I have been offered a discount on a product sold by one of Arista's suppliers. May I take advantage of the discount?

A: It depends. You may accept the discount only if the program is generally available to all Arista employees. Accepting discounts not generally available to Arista employees may create the appearance of favoritism to influence decision making.

Entertainment

You may accept occasional meals or other entertainment appropriate to the circumstances in connection with normal business discussions. Again, it is inappropriate to accept such favors if they are offered solely to influence your business decision. If an individual or firm doing or seeking business with Arista offers you entertainment that is more than modest or routine, you must obtain the written approval of your supervisor before accepting. Every employee is personally responsible for ensuring that acceptance of any business courtesies, gifts or entertainment is proper and does not reasonably appear to be an attempt by the offering party to secure favorable treatment.

Q: May I accept a business meal from a representative of a supplier or vendor?

A: In most circumstances, Arista employees may accept modest and infrequent business meals. On other occasions, it may be more appropriate for Arista or the employee to pay for the meal. Whenever a vendor pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or even appear to be compromised.

Q: I am responsible for organizing Arista customer meetings, including the selection of hotel reservations. May I ask the hotel manager for a complimentary room for my personal use, since we are giving so much Arista business to the hotel?

A: No. Your request would violate Arista's policy. Your solicitation of a complimentary room would be using your position to obtain preferential treatment and could also affect your impartiality in making the hotel reservations.

Outside Communications and Press

Our policy in communicating with anyone outside of Arista – even family and friends – is to never disclose any confidential information without proper authorization (subject to any rights or activities that are protected by law, including, without limitation, under Section 7 of the National Labor and Relations Act). This includes our financial results, business prospects, new product plans or launches, or any other non-public information.

In order for any employee to speak to the media, issue press releases, or make (or authorize others to make) official statements to third parties on behalf of Arista, the employee must either be an authorized spokesperson under Arista's External Communications Policy (which is available on our Company's intranet) or receive advance written approval from Arista's Public Relations Department. This policy applies, without limitation, to all digital and print media, television, radio, social media, blogs, podcasts, and other forms of public communication. Employees who receive inquiries from the media about matters relating to Arista's business or our Company practices or that seek comment on behalf of Arista should always refer them to Arista's Public Relations Department and refrain from responding unless otherwise authorized.

All outside communications on behalf of Arista must be truthful and respectful, and must comply with all applicable laws and Arista policies, including this Code and its

External Communications Policy. Employees with questions about these requirements may contact Arista's Public Relations Department.

Q: You receive a call from an investment analyst who heard that Arista is having a bad quarter. Having just sat through a forecasting call, you know that the opposite is true – Arista is about to have an amazing quarter. May you set this investment analyst straight?

A: No. You should not speak with this analyst. Only spokespersons authorized by Arista Investor Relations, at the direction of Executive Management, are allowed to speak with the financial community about Arista or its financial prospects.

Q: You receive a call from a reporter who wants more information about a new Arista product announcement. You are very familiar with the product. May you speak with this reporter?

A: Not without first obtaining permission from Arista's Public Relations Department. Arista's Public Relations Department must provide advance written approval for all communications with the public on behalf of Arista.

Q: A supplier asks you to speak to a journalist at an industry conference about Arista's use of the supplier's products and the impact they have had on Arista's business. May you speak with this journalist?

A: No. Unless you are an authorized spokesperson, communicating with this journalist would only be permissible with advance written approval from Arista's Public Relations Department.

Social Media

We encourage communication among our employees, customers, partners, and others.

You should exercise good judgement when using social media and should never

disclose non-public information about Arista, its customers or any third party that does business with Arista.

It is particularly important to remember the following:

- This Code and Arista's corporate and legal policies apply to your online conduct (social media, blogging or other online comments and discussions) just as much as they apply to your offline behavior;
- Do not disclose any confidential information of Arista including any discussion of future product offerings;
- Respect other's intellectual property rights, including copyrights;
- Make it clear that your opinions are your own and do not necessarily reflect the views of Arista;
- Refrain from making any statements, posts, re-posts or otherwise making comments (online or otherwise) relating to Arista's business, including its financial results and business prospects that may violate Arista's External Communications Policy; and
- Refrain from making any statements or posts that violate our Company's policies against discrimination or harassment or that maliciously defame others.

Employees with questions about these requirements may contact Arista's Public Relations Department.

Conflicts of Interest

The term conflict of interest describes any circumstance that could cast doubt on an employee's ability to act with total objectivity with regard to Arista's interests. Arista wants its employees' loyalty to come easily, free from any conflicting interests.

All employees have a duty to avoid financial, business, or other relationships that might be opposed to the interests of Arista or might cause a conflict with the performance of their duties. Employees should avoid even the appearance of conflict between their personal interests and those of Arista.

Conflict of interest situations may arise in many ways. Examples of conflict of interest situations include, but are not limited to, the following:

- Performing any work for a competitor, regardless of the nature of the work, while employed by Arista;
- Acting independently as a consultant to an Arista competitor, customer, or supplier;
- Engaging in any activity or employment that interferes with or detracts from an employee's work at Arista, or requires an employee to disclose Arista proprietary information;
- Performing services as a director, advisor, employee, agent or contractor for an actual or potential competitor, customer, partner, or supplier of Arista;
- Having any involvement with a third-party that is entering into a transaction, arrangement or agreement with Arista if the employee or any member of the employee's family or friends, is affiliated with such third-party (including having a substantial ownership or other financial interest or management responsibility with the third-party);
- Having a personal relationship (familial or otherwise) with a customer, supplier, competitor, or business partner, if that relationship

impairs your objective business judgment;

- Acquiring real estate or other assets of interest to Arista; and
- Ownership of a substantial interest in, a company that is a competitor with or a supplier of Arista by an employee, or any member of the employee's family if such investment presents a conflict of interest.

Sometimes, a conflict of interest will develop gradually or unexpectedly, and the appearance of a conflict of interest can also easily arise. If you feel that you have a conflict, actual or potential, report all pertinent details in writing to Arista's Legal Department. The presence of a conflict does not necessarily mean that the proposed activity will be prohibited. Your responsibility is to fully disclose all aspects of the conflict and remove yourself entirely from the decision-making process.

You may not perform services as a director, advisor, employee, agent or contractor for a customer, a supplier, or any other entity without express prior written approval from Arista's Legal Department.

With respect specifically to any request by an employee to serve as a director, advisor, employee, agent or contractor to another company, again you must be very sensitive to an actual or potential conflict of interest. Generally, no conflict is presented if your service would:

- (1) require at most a very minimal commitment of time during your Arista work hours and would not otherwise detract from your job responsibilities at Arista,
- (2) not cause you to disclose Arista proprietary information; and
- (3) not be for an actual or potential Arista competitor, customer, supplier, or other business partner.

Regardless of whether you perceive a conflict, before serving as a director, advisor, employee, agent or contractor to any company or engaging in any activity that may involve a conflict, you must first obtain the written approval of Arista's Legal Department.

Q: I am an Arista employee and have been asked to take a seat on the board of directors of a start-up company. May I accept?

A: Not without approval. If you wish to serve on a board of directors, you must receive written approval from Arista's Legal Department. The company for which you serve should not be in a competitive position with Arista and should not be a customer, partner, or supplier of Arista, and the time required to serve on the board should not be substantial. You may receive compensation when serving in an approved position.

Q: May a software developer, on his or her own time and without using any Arista equipment or proprietary information, utilize engineering knowledge and skills to design, develop, and market for profit a product or service that does not compete with Arista products or services?

A: As long as the product or service does not relate in any way to Arista's business and is not a product or service that Arista would likely offer in the future, the software developer may undertake such an endeavor.

Q: An Arista employee, whose husband owns a graphic design firm, needs to retain a graphic artist to assist in the creation of Arista marketing collateral. May she select her husband's firm if the cost is comparable to alternative graphic design firms?

A: Not without approval. This situation presents a direct conflict of interest, and the employee should not proceed without approval. The employee must fully disclose the situation to and obtain the approval of her manager. The employee must remove

herself entirely from the selection and decision-making process.

Corporate Opportunities

Arista employees have a duty to Arista to advance its legitimate interests when the opportunity to do so in a legal and ethical manner arises. Arista employees are prohibited from:

- Personally taking for themselves, or their family members, opportunities that are discovered through the use of corporate property, information or position;
- Using corporate property, information or position for personal gain or for the gain of their family members; and
- Competing with Arista in any way.

You may only pursue such opportunities if you have received prior written approval to do so if you are (i) an employee, by the Chief Executive Officer, Chief Financial Officer or General Counsel, or, (ii) an officer or member of the Board, by the Board or its designated committee.

Sometimes the line between personal and Company benefits is difficult to draw, and sometimes there are both personal and Company benefits in certain activities. The prudent course of conduct is to make sure that any use of Arista's property or services that is not solely for the benefit of Arista, is approved beforehand by Arista.

Protecting Confidential Information

You are required to protect confidential information to which you have access in connection with your Arista employment. All Arista employees are required to use Arista's confidential information for business purposes only and must always keep such information in strict confidence, unless

disclosure is authorized in advance by Arista's Legal Department or is legally mandated.

All information related to Arista's business that is not intended for public disclosure should be considered confidential. Confidential information includes:

- Financial or legal information;
- Software and hardware developments;
- Marketing and sales plans;
- Competitive analysis;
- Product development plans;
- Product costs and pricing;
- Potential contracts, mergers, or acquisitions;
- Business and financial plans or forecasts; and
- Private information about other employees or personnel (e.g., Social Security numbers).

Any system that is used to record Arista financial, sales, marketing, engineering, or other Arista's confidential business data must be under Arista's control.

In addition, information concerning Arista's customers, partners, prospective customers, and vendors that was provided to Arista under nondisclosure agreements is considered confidential information.

Protection of Arista software, firmware and other codes is particularly essential to our business. Arista software is always treated as confidential. Any disclosure of source code outside of Arista must be approved in advance.

Arista also expects employees to abide by all security policies. Do not access or attempt to access systems or physical areas without appropriate authorization. Similarly, you may not allow third parties to access Arista

systems or physical areas without obtaining appropriate authorization. Report any unauthorized access of Arista's networks or systems to Arista's Legal Department.

Your obligation to protect Arista's confidential information and personal information continues after the end of your employment with Arista. Moreover, just as we expect employees to abide by their obligations not to disclose this information after they leave, we expect employees to abide by their obligations to protect the confidential information of their former employers. No confidential information obtained during or as a result of your work with former employers should be brought on Arista premises or used in any form in your work at Arista.

Arista's privacy policies govern the collection, use, transfer, and security of employee data, customer and prospect data, and other data Arista may access in connection with services. You are required to abide by these policies when collecting or processing the relevant personal information.

In circumstances where it is necessary to share Arista's confidential information with customers, prospects, suppliers or other third parties, Arista's employees need to take all steps necessary to protect Arista's confidential information, including the following:

- You must first enter into a non-disclosure agreement with the third party that protects the confidential information to be exchanged. This agreement must be either the standard Arista form, or a form that has been approved by Arista's Legal Department;
- You must only disclose confidential information that is necessary for the third party to evaluate our products or

otherwise engage in a business relationship;

- Where confidential information is provided in writing, it must be conspicuously marked as being "Arista Confidential" and, if applicable, "Arista Proprietary";
- Where confidential information is provided verbally, it should be clearly stated as being "Arista confidential" and, if applicable, "Arista proprietary" information. In certain cases, the confidentiality agreement may require that the information be followed with a written memorandum describing such confidential information. You should be careful to understand and fully comply with the terms of the confidential information; and
- You must not disclose any particularly sensitive confidential information regarding Arista's intellectual property. Any disclosure of source code outside of Arista must be approved in advance by Arista's Legal Department.

Protected Activity

Nothing in this Code prohibits you from filing and/or pursuing a charge or complaint with, or otherwise communicating or cooperating with or participating in any investigation or proceeding that may be conducted by, any state, federal, local, or other governmental agency, including the Securities and Exchange Commission, the Occupational Safety and Health Administration, the Equal Employment Opportunity Commission, the Occupational Safety and Health Administration and the National Labor Relations Board (together the "Government Agencies"), including disclosing documents or other information as permitted by law. In addition, nothing in this Code, including its

prohibitions pertaining to Arista's confidential information, prevents you from discussing or disclosing information about unlawful acts in the workplace, such as harassment, discrimination, retaliation, or any other conduct that you have reason to believe is unlawful. Notwithstanding, in making any such disclosures or communications, you must take all reasonable precautions to prevent any unauthorized use or disclosure of any Company trade secrets, proprietary information, or confidential information that does not involve unlawful acts in the workplace or the activity otherwise protected herein. Additionally, you are not permitted to disclose any Company attorney-client privileged communications or attorney work product. Additionally, you understand that nothing in this Code limits employees' rights to discuss or disclose the terms, wages, and terms and conditions of employment as protected by applicable law, including any rights under Section 7 of the National Labor Relations Act (or otherwise impairs employees from assisting other Company employees and/or former employees in the exercise of their rights under Section 7 of the National Labor Relations Act). Any language in any other agreements that you have entered into with our Company that conflicts with, or is contrary to, this paragraph is superseded by the language in this paragraph.

Gathering Information About Our Competitors or Other Third Parties

You may not seek to obtain proprietary information about Arista competitors, and you may not seek to obtain any information about Arista competitors or other third parties illegally or in a way that involves a breach of integrity or breach of any confidentiality or employment agreement. You must never misrepresent your identity when attempting to collect competitive information. In the

event that you inadvertently obtain a third party's confidential or proprietary information without authorization, you must immediately contact Arista's Legal Department. Unless Arista's Legal Department instructs otherwise, you must promptly destroy all copies of such information in your possession.

We may make appropriate observations about competitors' products and activities when basing them on publicly available information, such as public presentations and marketing documents, journal and magazine articles, advertisements, and other published information.

Q: I just received a copy of proprietary competitive information in the mail from an unknown source. Can I use it?

A: No. Instead, immediately contact Arista's Legal Department. Proper intelligence gathering is a legitimate marketing strategy, but Arista will never approve use of apparent proprietary information that it receives from unknown sources.

Q: A competitor is holding a conference for its customers to announce future product plans. May I register for the conference under a false name to gain entrance to the conference?

A: No. You may not misrepresent your identity when attempting to gather any information. Arista may face liability for theft of trade secrets or corporate espionage or be restricted from pursuing its own business plans to the extent those plans may have been tainted by unauthorized access to a competitor's trade secrets. Legitimate fact gathering through public sources is permissible.

Use and Protection of Arista Resources

We use a number of our Company's resources to perform our jobs. These include

Arista facilities, computers, telephones, and email. It is critical that each of us fully understands the requirements for appropriate use and protection of these resources.

You are required to comply with the Arista Acceptable Use Policy for Company Resources regarding:

- Personal use of Arista resources and appropriate conduct;
- Use of social media, instant messaging, email, voicemail, mobile phones, removable media, P2P networks, encryption, and wireless LANs;
- Securing connections to the Arista network;
- Use of passwords and prevention of viruses;
- Protection of confidential information;
- Issuance of public statements;
- Marketing activities;
- Third-party use of Arista systems; and
- Monitoring use of our Company's resources and facilities.

Theft, carelessness and waste have a direct impact on Arista's profitability. Employees should protect Arista's assets and ensure their efficient use. All Arista resources should be used for legitimate business purposes.

Any suspected incident of fraud or theft should be reported immediately to the employee's manager or the General Counsel for investigation.

Arista may employ security procedures at its facilities to monitor and maintain security, including the use of closed-circuit television. Also, Arista's computers, systems, and resources may be monitored to the extent permitted by applicable law. Arista

employees have no expectation of privacy in Arista property (e.g., computers, systems), and all such property is subject to inspection by Arista personnel at any time with or without further notice.

In addition, Arista requires its employees to comply with Arista's information and physical security policies at all times. Arista property may not be sold, loaned, given away, or disposed without proper authorization.

Upon leaving employment with Arista or upon earlier request by Arista, all Arista property – including keys, security badges, computer equipment, software, handbooks, and internal documents – must be returned to Arista.

Q: Can I send a personal email from my Arista email account or call a family member from my office phone?

A: Yes, provided that these activities are reasonably limited, there is no incremental cost to Arista, and your work is not disrupted.

Q: Can I use Arista equipment for a side business at home if my manager and I have determined that such activity is not a conflict of interests?

A: No. Even if there is no conflict of interest, you have an obligation to use Arista assets and resources only for Arista business.

Q: Arista has purchased numerous software programs to assist employees in performing their work. I have been asked to copy one of these computer programs for use by other Arista employees because the software program is needed immediately, and they cannot wait for their copies to be purchased. May I do this?

A: It depends. If the programs are copyrighted or otherwise protected and Arista has not negotiated a company-wide license, the copying of such programs would not only be in violation of Arista's policy but could subject Arista to a civil lawsuit. You should never make copies of software unless

you are certain that you have a legal right to do so.

Arista and Its Employees

Arista places great value in its employees and the environment in which we work. We encourage you to express ideas for improving the workplace and any concerns you may have about the workplace or specific job-related problems. We will not retaliate nor tolerate retaliation against any employee who raises an issue, complaint, or concern in good faith. We deal fairly and equitably with each employee.

Diversity

Arista affirms the principle of equal employment opportunity without regard to any protected characteristic, including but not limited to:

- Race;
- Religion;
- National origin;
- Color;
- Sex/Gender;
- Gender identity or expression;
- Age;
- Disability;
- Pregnancy;
- Marital status;
- National origin/ancestry;
- Military or veteran status;
- Sexual orientation; or
- Any other characteristic protected under applicable law.

We practice and promote such policies in all locations as appropriate under the law. We affirm this principle of freedom from discrimination in all aspects of the employment relationship, from recruitment

and hiring, through performance evaluations, compensation, and promotions, through the end of your employment relationship with Arista.

Harassment

Arista's policy is to provide a work environment free from harassment. Workplace harassment may include sexual harassment and/or harassment based upon a person's race, color, religion, national origin, sex/gender, sexual orientation, gender identity or expression, age, disability, or other protected characteristics. Arista prohibits harassment in any form, whether physical, verbal, or non-verbal.

Additionally, Arista wants to ensure that the workplace is free from abusive conduct which may include verbal abuse, the use of derogatory remarks, insults and epithets, any verbal or physical conduct that a reasonable person would find threatening, intimidating or humiliating, or malicious conduct by one employee towards another that a reasonable person would find hostile, offensive and unrelated to Arista's legitimate business interests.

Report instances of discrimination, harassment, retaliation, or abusive conduct to your manager or to your Human Resources representative. Your report will be kept confidential to the extent possible, and no complainant nor witness will suffer retaliation because of a report made in good faith or cooperation with an investigation. If you feel you cannot report the behavior to your manager or Human Resources representative, report it to Arista's anonymous online portal through www.arista.ethicspoint.com, or to another manager with whom you feel comfortable speaking. If making a report anonymously, please provide sufficient information for Arista to conduct an inquiry into your report. Any person may also call Arista's Anonymous Reporting Hotline. Information for the applicable hotline telephone number

in your geography can be found at www.arista.ethicspoint.com.

Q: Most of your work is physically performed around a specific person who appears to be interested in you romantically. He/she often makes flirtatious remarks that make you a little uncomfortable and this individual tends to get a little too personally close to you. Up until now you've been able to ignore his/her behavior, but lately, he/she has taken to calling you at home late into the night. Then one day, he/she asks you for a date. Should you report his/her behavior?

A: Yes, you should report this behavior immediately. Part of your supervisor's job is to listen to complaints regarding the actions of people under him/her and to act on the information available. In cases such as harassment that includes reporting the matter to Arista's Human Resources Department to initiate a review and, if necessary, an investigation.

Q: Is it acceptable to become romantically involved with another employee?

A: It depends. Romantic relationships between employees can create actual or apparent conflicts of interest, and it is not permissible to let those relationships affect the workplace. It is your responsibility to ensure that your personal romantic life does not interfere with your conduct in any way, including your objective business judgment and compliance with applicable corporate policies. In addition, we have a strict policy against romantic relationships between managers or supervisors and employees in their organization due to the inherent potential for conflict this situation creates. Any such relationship must be disclosed promptly to Arista's Human Resources Department and may require changes to reporting relationships or even termination of either or both individuals involved. Consult

Arista's Employee Handbook for additional guidance on this issue.

Q: You reported what you feel is harassment to your supervisor, but he doesn't appear to take your concern seriously. Do you have other options?

A: Yes. You should take the matter directly to Arista's Human Resources Department, report it to another manager with whom you feel comfortable speaking, or report it to Arista at www.arista.ethicspoint.com. Any person may also call Arista's Anonymous Reporting Hotline. Information for the applicable hotline telephone number in your geography can be found at www.arista.ethicspoint.com.

Q: I received an email that I was not supposed to receive, and it included very offensive jokes. What do I do?

A: Offensive jokes sent through our Company's email, regardless of the intended recipient, have no place at Arista. You may respond directly to the co-worker, notifying him or her that you found the email offensive and asking him or her to refrain from sending out such emails in the future, and/or you may report it to a manager, HR, Arista's online portal, or Arista's Reporting Hotline (see prior question/answer).

Health and Safety

We are committed to protecting the health and safety of our employees, visitors, and the public. Our policy is to maintain our facilities and run our business operations in a manner that does not jeopardize the occupational health and safety of employees. Compliance with health and safety laws and Arista's policy is expected of all employees. Threats or acts of violence against Arista employees, temporary employees, independent contractors, customers, clients, partners, suppliers, or other persons and/or property will not be tolerated. Immediately report potential threats or acts of violence. In case

of emergency, contact local law enforcement.

Enforcement

The strength of Arista is its people. We trust that each of you will recognize that we must adhere to the standards of this Code and uphold Arista's business values if we are to continue as leaders in our industry.

Though we are confident that we can count on every member of the Arista team to do his or her part, we would be remiss if we did not state categorically that deviations from our policies or business conduct standards will not be tolerated.

Reporting Violations

You are encouraged to seek guidance from your manager, Arista's Human Resources Department or Arista's Legal Department when in doubt about the best course of action to take in a particular situation. If you learn about or suspect a violation of this Code, you should promptly report it to your manager, Arista's Human Resources Department or Arista's Legal Department. Any person may also make a report online at www.arista.ethicspoint.com or call Arista's Anonymous Reporting Hotline. Information for the applicable hotline telephone number in your geography can be found at www.arista.ethicspoint.com.

Anyone who believes in good faith that banking, accounting, finance, internal accounting controls, audit practice, bribery or anti-corruption or antitrust/competition violations or practices have occurred or are occurring may also make a report in accordance with Arista's Policy Regarding Reporting of Accounting, Audit and Other Matters. In all circumstances, employees are encouraged to share their identity when reporting, as that will help Arista conduct the most thorough investigation possible, because it is more difficult to thoroughly investigate anonymous reports. However, if

the individual is uncomfortable doing so, they may report anonymously and, if the situation warrants or requires it, the reporting person's identity will be kept anonymous to the extent legally permitted and practical.

In addition, employees may make a report via a third party hosted confidential website at www.arista.ethicspoint.com or by calling Arista's ethics/violation hotline (telephone numbers available at www.arista.ethicspoint.com).

The Investigation Process

Investigations of allegations of misconduct will be conducted in an ethical manner and in compliance with applicable law and Arista's policies. Only Arista's legal counsel may commence an investigation relating to a potential Code of Conduct violation.

Arista may employ a variety of methods to conduct investigations. To the extent not prohibited by applicable law, investigation methods may include interviews with the parties and witnesses, review of relevant financial and other records, criminal and background checks, monitoring and/or analysis of computers, systems, offices, and other resources.

You have a duty to fully cooperate with investigations and to promptly, completely, and truthfully comply with all requests for information, interviews, or documents during the course of an investigation. Arista treats all reports of alleged misconduct as confidential, and only those persons with a need to know are informed of and involved in an investigation.

Disciplinary Action

Factors considered in determining appropriate action may include whether any laws were violated; whether this Code or any other company policies were violated; Arista's response to similar situations; whether the law in the relevant jurisdiction requires or prohibits a particular action; the

employee's tenure, performance, and disciplinary history; and other relevant factors. Arista will review the circumstances of each case and has the sole discretion to determine the appropriate disciplinary action.

At the end of an investigation, appropriate disciplinary action will be taken, or no disciplinary action may be necessary, based on the findings. In addition, Arista may report civil or criminal violations to the relevant authorities.

Arista will take disciplinary action against any individual violating these standards. Specifically, it will take disciplinary action against any employee or manager who is found to have:

- Authorized, condoned, participated in, or concealed actions that are in violation of the law, Arista's policies or business conduct standards;
- Disregarded or approved a violation;
- Through lack of diligence in supervision, failed to prevent or report violations; or
- Retaliated, directly or indirectly, or encouraged others to retaliate, against an employee who reported a potential violation of Arista's policies or business conduct standards.

Unsubstantiated allegations will not result in an adverse employment action against an employee accused of wrongdoing, and retaliation will not be tolerated against any employee who reports a concern or allegation in good faith or cooperates with a compliance investigation.

Amendment

The Company reserves the right to amend this Code at any time, for any reason, subject to applicable laws, rules and regulations.