

# CODE OF ETHICS AND BUSINESS CONDUCT

Version 2.5

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*(signatures on file)*

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# 1. Code of Ethics and Business Conduct

## 1.1. Purpose

The Code of Ethics and Business Conduct (the “Code”) is designed to promote a responsible and ethical work environment for all employees and members of the Board of Directors of Limelight Networks, Inc. and its subsidiaries (collectively “LLNW”). The Code contains guidelines concerning proper behavior in the workplace and contact information to be used in the event you have questions or concerns (see “[Limelight Networks, Inc. Contact Information](#)” at the end of the Code). The Code applies to all LLNW employees and members of the LLNW Board of Directors, as well as consultants and agents doing business on behalf of LLNW.

## 1.2. Your Responsibilities

In performing your duties for LLNW, you are responsible for abiding by LLNW policies and all local and national laws in all countries in which LLNW does business. You are also obligated to comply with all other applicable laws, rules and regulations of any regulatory organization, licensing agency or professional association governing your professional activities. You are responsible for knowing and following the laws and policies that relate to your duties, including the policies in the Code and all other LLNW policies. If you have questions about specific laws that may apply to your activities or about whether particular circumstances may involve illegal conduct, contact the LLNW Legal Department. You should also contact the Legal Department if you think a provision of this Code may conflict with an applicable legal requirement or a provision in another LLNW policy.

Violating the Code or other LLNW policies may result in corrective action, up to and including termination of employment and LLNW may seek to recover damages or file criminal charges. Most problems can be easily avoided by simply using good judgment and seeking guidance when questions arise. It is your responsibility to raise questions, make appropriate disclosures and bring potential problems to LLNW’s attention.

## 1.3. Reporting Code Violations

It is important to report all violations or suspected violations of the Code. You may report suspected violations of the Code, and any other ethics or integrity issues, to your manager, to the Legal Department or Human Resources Department or by calling the [Limelight Networks, Inc. Corporate Governance Hotline](#) (the “Corporate Governance Hotline”). The Corporate Governance Hotline can also be used to report questions or concerns involving LLNW’s accounting, auditing, financial reporting or internal controls. Reports to the Corporate Governance Hotline may be made confidentially and anonymously.

Neither your manager nor LLNW will take any action against you for reporting suspected misconduct in good faith. Information about how to contact the Corporate Governance Hotline appears under “[Limelight Networks, Inc. Contact Information](#)” at the end of the Code along with other important contact information.

If you are an executive officer or director, you should contact the Chief Legal Officer.

Reports of potential misconduct will be taken seriously and investigated promptly and thoroughly. All reports will be kept confidential to the extent practical, except where disclosure is required to investigate a report or by applicable law or legal process.

#### **1.4. No Retaliation**

It is against LLNW policy, and in some cases against the law, for LLNW to take any adverse action against an employee, director, vendor or agent of LLNW for reporting or threatening to report a violation of this Code or cooperating in investigations relating to Code violations, provided that the person has acted in good faith and with a reasonable belief that the information provided is true.

#### **1.5. Sales Agents, Consultants and Professional Services**

Sales agents, consultants, representatives, independent contractors, external temporary workers and suppliers are expected to observe the same standards of conduct as LLNW employees when conducting business with or for LLNW. No employee may indirectly, through agents, do anything the employee is prohibited from doing under LLNW policy. Business integrity is a key standard for the selection and retention of those who represent LLNW.

## **2. Conflicts of Interest**

### **2.1. General**

All business decisions should be made solely in the best interests of LLNW, not for personal benefit. Therefore, you should avoid any actions that create, or appear to create, conflicts of interest with LLNW. A “conflict of interest” may occur when an individual’s own interests (including the interest of a family member or an organization with which an individual has a significant relationship) interfere, or appear to interfere, with the interests of LLNW.

Many conflicts of interest or potential conflicts of interest may be resolved or avoided if they are appropriately disclosed and approved. In some instances,

disclosure may not be sufficient and LLNW may require that the conduct in question be stopped or that actions taken be reversed where possible.

Employees (other than executive officers) should address potential conflicts of interest with the Chief Legal Officer, and executive officers and directors may address potential conflicts of interest with the Governance Committee who may seek guidance from Chief Legal Officer or outside counsel as appropriate.

## 2.2. Gifts, Gratuities and Other Payments

We make our business decisions with honesty and integrity, based on objective factors such as cost, quality, value, service and the ability to carry through on commitments. This includes decisions about which external partners we work with, such as vendors and suppliers and how we work with them.

LLNW wants to avoid even the appearance of impropriety in making its business decisions. Therefore, LLNW employees and directors should not give anything of value to anyone or accept anything of value from anyone, when doing so may compromise or appear to compromise the objectivity of business decisions.

Except as specifically noted below, this includes giving to, or accepting from, a current or prospective supplier, vendor, landlord or competitor of LLNW, any gifts, entertainment or any form of compensation. Employees are prohibited from receiving any samples or gifts at home; all samples and gifts must be sent to the employee's primary work location. Employees and directors are prohibited from accepting any goods, loans or services from any LLNW vendor who is not otherwise in the business of providing such goods, loans or services, and any such goods, loans or services provided must be provided on fair market value terms.

Some gifts and entertainment are allowed as follows:

- (1) Gifts with an established value of \$150 or less are generally allowed. Gifts with an indeterminate value or value in excess \$150 may only be accepted if approved in advance by an executive officer who determines that under the circumstances there is a value to the business to permit acceptance of the gift and acceptance will not compromise or appear to compromise the objectivity of business decisions.
- (2) Business-related meals, of reasonable value are allowed. Reasonable, business-related attendance of sporting or other entertainment events or education related events in the company of the customer or vendor is allowed.
- (3) Gift baskets or flowers may be accepted.
- (4) Promotional items, such as those bearing a vendor's logo, may be accepted up to a total estimated value of \$100.

- (5) Existing employees may accept samples of new or reformulated products, and new employees may accept samples of existing products. It is not appropriate for employees to receive for their personal use multiple samples of the same product from a vendor.

If someone attempts to give you a prohibited gift, you should politely decline and report it to your manager for appropriate action.

### **2.3. Doing Business with Spouses, Relatives, Friends or Your Own Business**

Employees and directors should not use their positions at LLNW for personal gain. Generally, it is not permissible to conduct business with an employee or director of LLNW or an LLNW employee's or director's spouse, relatives or friends if the employee's role allows him or her to influence purchasing decisions for the employee, facility or region where he or she works.

Additionally, it is considered a conflict of interest for any director or executive officer to hold a 5% or greater interest in a major customer, vendor or lender to LLNW. This provision is not to be construed to limit or impair the investment activities of the employer or affiliate of any independent director.

Employees (other than executive officers) may send requests for approval of particular transactions or situations to the Chief Legal Officer, and executive officers and directors may send requests to the Governance Committee.

### **2.4. Outside Employment or Service as Director of Officer**

All employees are expected to avoid any outside employment with or investment in companies that are in competition with LLNW (other than immaterial or insignificant investments such as indirect investments through mutual funds or retirement accounts). An employee who wishes to initiate or continue an employment or business relationship outside of LLNW should seek approval from their manager and the Legal Department. Employment or business relationships that present a possible conflict of interest due to the nature of the work or due to the level of commitment required will not be approved. Approved outside business activities may not interfere with the employee's work for LLNW, and the employee may not use LLNW's name, equipment, facilities, or other resources for outside activities. Employees may be subject to additional restrictive covenants relating to outside business activities and competition with LLNW contained in their employment related agreements with LLNW. This provision is not to be construed to limit or impair the outside employment or investment activities of non-employee directors or their employers or affiliates. These policies are supplemental to, and not a substitute for, whatever additional restrictive covenants an employee may be subject to.

The Governance Committee must approve of any circumstance in which an executive officer serves as an employee, director, officer, partner, agent or consultant to any LLNW vendor, lender or competitor.

## **2.5. Donations and Other Payments**

Employees and directors are prohibited from authorizing donations or other payments from LLNW to outside organizations such as not-for-profits with which they or a member of their immediate family have a personal affiliation. No contributions, gifts or payment may be made from LLNW to any political party, candidate, lobbying organization, etc., without the prior approval of the Chief Executive Officer.

## **2.6. Opportunities Related to LLNW's Business**

Employees and directors may not take for themselves opportunities related to the business of LLNW or opportunities that they discover through their positions with LLNW or through the use of LLNW property or information.

## **2.7. Extensions of Credit**

Employees and directors are prohibited from extending any form of credit from LLNW to any organization with which they or a member of their immediate family have a personal affiliation. The only exceptions to this rule are accounts receivable from customers arising in the ordinary course of business and other programs previously approved by the Chief Financial Officer or the Chief Executive Officer.

## **2.8. Leasing Property and Equipment**

Any property or equipment lease between LLNW and an employee (other than an executive officer) or the employee's immediate family or any organization to which they are affiliated must be approved in advance by the Chief Executive Officer, Chief Financial Officer or Chief Legal Officer.

Any property or equipment lease between LLNW and a director, executive officer, an executive officer's or director's immediate family or any organization with which they are affiliated must be approved in advance by the Governance Committee.

## **2.9. Consulting and Other Professional Services**

Employees and directors are prohibited from providing consulting or other professional services to LLNW for payment outside of their normal compensation without prior approval of the Governance Committee.

Any situation in which LLNW would retain the services of a professional services



firm with which an employee (other than an executive officer) or an employee's immediate family is affiliated must be approved in advance by an Executive Officer.

Any situation in which LLNW would retain the services of a professional services firm with which a director, an executive officer or a director's or executive officer's immediate family is affiliated must be approved in advance by the Governance Committee.

Examples of professional services include, but are not limited to, accounting, auditing, architectural or design, engineering, investment or commercial banking, legal services, project management and computer programming.

### 3. Legal Compliance

#### 3.1. Insider Trading

In the course of work at LLNW, we may become aware of material non-public information about LLNW or other companies that is not available to the public. "Material" information includes any information that would influence a reasonable investor to buy or sell LLNW stock or to buy or sell the stock of another company with a current or prospective material business relationship with LLNW.

The use of material, non-public information by employees for their own financial benefit or that of a spouse, relative or friend is against LLNW policy and against the law. It is a serious violation of securities laws to buy or sell LLNW stock (or securities of another company to which the information applies) while in possession of material, non-public information. It is also illegal to give the information to others who can reasonably be expected to use the information to trade any stock. The law imposes severe criminal and civil penalties and fines for individuals who violate this law. Please refer to the [Limelight Networks, Inc. Insider Trading Policy](#) or call the Legal Department with any questions.

#### 3.2. Bribes and Improper Payments

Making bribes, kickbacks or other improper payments to government officials, civil servants and private individuals to influence them is prohibited. The U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act of 2010 ("UK Bribery Act"), and various other local laws makes it illegal for anyone at LLNW or anyone acting on behalf of LLNW to offer, promise or pay money or anything of value, directly or indirectly, to any foreign government official or employee, political party or candidate for public office, and even individuals in the private sector for the purpose of obtaining or maintaining business or for any other business advantage. The fact that bribery may be an accepted local practice in a country

does not relieve LLNW employees from complying with the FCPA, the UK Bribery Act or other local laws.

As a result, LLNW does not permit the use of corporate funds for political contributions, regardless of their size, to or on behalf of any political party, candidate or cause. The term “contributions” includes the free use of company facilities, property or personnel, advertisements on behalf of candidates, purchase of tickets to political dinners, etc.

The only exception to this restriction would be in connection with the legitimate lobbying efforts of a trade association of which LLNW is a member, and then only with the approval of the Legal Department. Employees of LLNW are, of course, permitted to participate in political activities on their own time. LLNW will not bribe or make payoffs to any government official, civil servant or anyone else. If employees are ever approached to make what could be considered a “questionable payment,” they should report the matter immediately to their manager and to the Legal Department.

Please refer to the [Limelight Networks, Inc. FCPA Policy](#) or consult the Corporate Legal Department concerning any questions related to the FCPA, the UK Bribery Act or other local laws.

### 3.3. Antitrust Laws

It is the policy of LLNW to conduct its business as a vigorous, but ethical, competitor, maintaining total compliance with antitrust laws and to hold employees in management positions accountable for taking the measures necessary to achieve this objective within their areas of responsibility. It should be noted that antitrust laws provide for severe criminal and/or civil penalties for a company which is convicted of an antitrust offense and for the individual employees involved in the antitrust activity.

Violations of antitrust laws generally arise as a result of “agreements” or “understandings” among competitors. These troublesome “agreements” or “understandings” would arise as a result of contact or communication among competitors. Therefore, LLNW employees must be extremely sensitive to communications between employees of other companies and themselves. Some such communication may, from time to time, be necessary in the ordinary course of business. However, extreme care must be used to ensure that these communications are kept to a minimum and do not form the basis for any misinterpretation or for inferences regarding illegal and unethical business practices.

Examples of some of these types of “problem practices” (along with brief explanations of their meaning) are provided in a link to the electronic version of

the Limelight Networks, Inc. Employee Handbook (the “Employee Handbook”) on LLNW Connect (“Examples of ‘Problem Practices’”).

In order to comply with Section I of the Sherman Act, no employee shall enter into any understanding or agreement—whether expressed or implied, formal or informal, written or oral—with a competitor limiting or restricting any of the following aspects of the competitive strategy of either party or of the business offering of either party to any third party or parties: prices, costs, profits, product or service offerings, terms or conditions of sale, production or sales volume, production facilities or capacity, market share, decisions to quote or not to quote, customer or supplier classification or selection, sales territories, and distribution methods.

Membership in a trade association can be very beneficial to a company. Therefore, it is LLNW’s policy to belong to trade associations when such groups contribute significant benefits to justify the time and cost of membership or support. Since trade association meetings are gatherings of competitors, they present the opportunity for an improper exchange of competitive information or for improper “agreements” or “understandings” to be reached among competitors, which could give rise to antitrust problems. Therefore, any employee who attends a trade association meeting must observe the Rules for Trade Association Meetings, which are noted in the Employee Handbook.

Employees should also be aware that participation in standard development and product certification activities, which impact competitors or suppliers, may raise antitrust concerns. Before participating in committees or organizations, which develop standards or certify products, employees should consult with the Legal Department. If an employee ever suspects that such a situation may be developing or acquires information that gives them reason to believe a violation of this policy may exist, they are required to contact the Legal Department immediately.

### **3.4. Fair Dealing**

Employees and directors should always deal fairly with LLNW’s customers, suppliers, vendors, competitors and employees. No one should take unfair advantage of another through manipulation, concealment, abuse of confidential information, falsification, misrepresentation of material facts or any other practice involving intention unfair dealing. This provision does not alter existing legal relationships between LLNW and its employees, including any at-will employment arrangements.

### **3.5. Export and Import Laws**

It is LLNW’s policy to comply with the export and import control laws and regulations of all countries in which LLNW does business. Compliance with

export control regulations requires that we know the end use and end-user for all LLNW transactions.

In addition, LLNW's policy is to comply with U.S. anti-boycott laws. This applies to LLNW everywhere we do business, in all parts of the world. U.S. anti-boycott law is intended to prevent LLNW from taking any action in support of a boycott imposed by one country upon a country that is friendly to the United States. LLNW is required to report the receipt of any request to participate in an international boycott. Requests are often found in letters of credit, shipping instructions, certificates of origin and other contract-related documents.

### **3.6. Complaints to Government Agencies**

Occasionally, a job applicant, customer or current or former employee may file or threaten to file a complaint against LLNW with the government. If an employee or director is notified about such a complaint, they should immediately contact the Legal Department.

### **3.7. Equal Opportunity Employer and Anti-Harassment Policy**

LLNW is an equal opportunity employer. It is the continuing policy of LLNW to recruit and employ the best qualified individuals without regard to race, color, sex, religion, national origin, disability, age, sexual orientation and/or any other protected characteristic as established by federal and state laws and regulations. Equal employment opportunity applies to all employment actions such as recruiting, hiring, compensation, benefits, promotions, training, transfers, terminations and opportunities for training. LLNW will not tolerate unlawful discrimination of any kind.

LLNW will not tolerate harassment of our employees, male or female, by anyone, including any manager, co-worker, vendor, customer, contractor or any other third party.

All employees are responsible for helping to enforce this policy against harassment. The [Corporate Governance Hotline](#) is also available as an avenue for reporting if all other options have been exhausted or if the employee requires an alternate source.

It is LLNW's policy to investigate all harassment complaints thoroughly and promptly. To the fullest extent practicable, the confidentiality of those involved will be maintained. If an investigation confirms that harassment has occurred, corrective action will be taken. Corrective action may include discipline up to and including immediate termination of employment. LLNW forbids retaliation and intimidation against anyone who has reported harassment or who has cooperated

in making a report, provided the report was made in good faith and with a reasonable belief that the report was true.

For more specific information on what constitutes harassment and the method of reporting concerns, please reference LLNW's EEO and Anti-Harassment Policy & Procedure. Any questions should be directed to Human Resources or the Corporate Legal Department.

### **3.8. Safety, Health and Environment**

LLNW is committed to providing a clean, safe and healthy work environment in every location and to being an environmentally responsible corporate citizen. LLNW's standard is to comply with all safety, health and environmental laws and regulations and ensure the safety and well-being of all employees. Safety is a shared responsibility of LLNW, managers and employees. Everyone is responsible for genuine cooperation with all aspects of safety, for continuously practicing safety in the performance of their duties and for reporting any potential unsafe, unhealthy or hazardous conditions.

## **4. Company Information and Assets**

### **4.1. Proprietary, Personal, and Other Confidential Information**

Given the nature of LLNW' business, protecting proprietary, personal, and other confidential information of LLNW and its business partners and customers is of vital concern to LLNW. This information is one of the LLNW's most important assets. It enhances LLNW's opportunities for future growth and indirectly adds to the job security of all employees. Therefore, employees must not use or disclose any proprietary, personal, or other confidential information that they produce or obtain during employment with LLNW, except to the extent such use or disclosure is required by their jobs. This obligation remains even after an employee's employment relationship with LLNW ends.

Intellectual property is increasingly important to LLNW' business, and all employees are hired to invent. Accordingly, all employees must fully and promptly disclose to LLNW all inventions, discoveries, know-how, or improvements, whether or not patentable and including works of authorship and other copyrighted works ("Intellectual Property"), which employees may conceive or make, alone or with others, during the periods of the employees' employment with LLNW, whether or not during working hours ("Term IP"). Employees also must promptly disclose to LLNW all Intellectual Property which they may conceive or make, alone or with others, within one (1) year after the termination of their employment with LLNW, which relates to, results from or is suggested by: (1) activities of LLNW, its subsidiaries, licensees or any affiliated companies; (2) any Proprietary, Personal, or other confidential Information of LLNW; or (3) any work

employees may have done for LLNW or affiliated companies ("Post-Term IP").

For more detailed information on this subject, please reference the [Limelight Networks, Inc. Intellectual Property and Non-Disclosure Policy](#), the [Employee Handbook](#) or consult the Corporate Legal Department. Each employee may also be subject to covenants concerning Intellectual Property in their employment related agreements with the LLNW. These policies are intended to be supplemental to, and a substitute for, the covenants to which an employee may be subject.

## 4.2. Company Communications

LLNW attempts to keep employees informed of policies, procedures, benefits and events occurring within the organization. Company intranet, e-mail, mailings, bulletin boards and newsletters are some ways LLNW attempts to deliver information to employees. LLNW asks that employees take the time to carefully read materials distributed for informational purposes. If employees require further explanation or additional information, they should contact their manager.

All communications, whether internal or external, news releases, case studies, advertising, blog postings, internet message board or chat room postings, or conversations with journalists, bloggers, industry or financial analysts must be cleared in advance with the Corporate Communications Department. All media inquiries, verbal or written, must be directed to the Corporate Communications Department who will evaluate the request and answer or direct it as appropriate. Media releases that include quotes by employees, or speaking/webinar engagements where the individual will be recognized as an employee of LLNW must first be approved by the Corporate Communications Department.

## 4.3. Online Forums

To avoid the actual and perceived improper use of Company information, and to avoid any impression that statements are being made on behalf of LLNW, unless approved by the Corporate Communications Department, no employee or director may make any posting to any non-LLNW-sponsored Internet chat room, message board, web log (blog) or similar forum, regarding LLNW business operations, either under their name, anonymously, under a screen name or communicating through another person.

## 4.4. Accurate Records and Reporting

Almost every employee at LLNW records and/or reports some type of data. All such record keeping and reporting must be handled with the utmost integrity - accurate, honest and complete and must not be organized in a way intended to mislead or misinform the reader. Whether the reported information is sales results, hours worked or some other company or customer information, it must be

accurate and timely and be a fair representation of all the facts. Some forms of inaccurate record keeping and reporting are illegal. Listing a fabricated expense on an expense account report or petty cash record is, for example, illegal. Misreporting time worked on a contract is also illegal.

LLNW's goal for record keeping and reporting is to have this process be 100% accurate, above-board and in compliance with all company policies and procedures and government legislation, including The Sarbanes-Oxley Act. All employees are expected to participate in achieving this goal. Any employee who is requested to make, authorize, or agree to any offer or payment which is, or may be, contrary to this policy will promptly report such information to the employee's manager, the manager in the area having responsibility for financial activity, or the Legal Department.

Also, if an employee acquires information (for example, newspaper reports, reports from customers, or statements of individuals involved) that gives them reason to believe that any employee is engaged in conduct forbidden by this policy, or that any sales representative, distributor, or other person or record representing LLNW in any transaction is engaged in the type of conduct (whether or not in connection with a transaction involving LLNW or its products) which, if engaged in by an employee of LLNW, would violate this policy, they will promptly report such information to the employee's manager, to the manager in the area having responsibility for financial activity, or to the Legal Department.

Any manager receiving a report as cited above will promptly consult with the Chief Legal Officer and thereafter will, after appropriate investigation, take timely remedial or other action as warranted under the provisions of this policy.

For additional information, please consult the [Limelight Networks, Inc. Records Management Policy](#) or contact the Legal Department.

#### **4.5. Computing and Information Resources**

LLNW considers its computing and information resources to be corporate assets having strategic value. It is the policy of LLNW to protect information assets under its control by implementing security controls to prevent the unauthorized disclosure, modification or destruction of non-public information; the disruption of information processing service provided to the users; and the theft of LLNW assets. LLNW also recognizes the strategic value of computing and information assets of others and will, accordingly, abide by and enforce compliance with all software licenses for rights to use such assets.

LLNW employees are to ensure that the use of LLNW computing and information assets, including the use of the Internet, electronic mail, and other on-line resources, and the use of computer hardware and software is consistent with the business objectives of LLNW. For additional information on this subject, please

consult the [Limelight Networks, Inc. Intellectual Property and Non-Disclosure Policy](#) and related policies.

#### 4.6. Privacy

LLNW is committed to respecting the privacy rights of our customers and our employees. In many cases, the release of confidential information, such as personally identifiable information, even if accidental, potentially exposes LLNW to significant fines and penalties and costly legal and regulatory requirements. It is the responsibility of every employee to respect the privacy of our customers, business partners and fellow employees. Access to and the use of employee and customer information is limited to only that which is required to perform your job. Employee and customer information should not be used for personal benefit or for the benefit of others.

#### 4.7. Fraud and Theft in the Workplace

All work-related activities at LLNW must reflect the standards of honesty, loyalty, trustworthiness, fairness, concern for others and accountability. LLNW property such as inventory, supplies and equipment, should be used for business purposes. LLNW property should be cared for and used responsibly and it should be protected from misuse, improper disclosure, theft and destruction. Taking or using LLNW property of any value for personal purpose, without appropriate permission of LLNW, constitutes theft.

Theft is illegal. LLNW does not tolerate any form of theft or anyone assisting another in theft. Anyone who is caught stealing any company property will be terminated and may be prosecuted to the fullest extent of the law. Theft costs LLNW and employees money that has to be diverted to pay for property that is stolen. LLNW encourages all of its employees and contractors to lock up and protect their valuables and other personal property while on company premises. Although LLNW cannot be responsible for the loss of personal property, all incidents will be investigated. Any employee who has been found to have stolen or used another person's personal property without their permission will be subject to discipline up to immediate termination of employment.

Employees that have knowledge about or see anyone committing fraud or theft must report it to management or to the [Corporate Governance Hotline](#) immediately. All disclosures will be kept confidential. Such disclosures indicate an employee's loyalty to the interests of LLNW and of their colleagues.



## 5. Contact Information

Corporate Governance Hotline	1 (866) 290-5180 <a href="https://www.openboard.info/lnw/index.cfm">https://www.openboard.info/lnw/index.cfm</a>
Chief Executive Officer, Bob Lento	
Chief Legal Officer, Michael DiSanto	
Assistant General Counsel – Corporate and Compliance, James Todd	
Senior Director of Human Resources, Kate Garcia	
Investor Relations, Sajid Malhotra	

## 6. Roles and Responsibilities

Role	Responsibility
Assistant Secretary	Maintain this Code of Ethics and Business Conduct in the Company's compliance document repository; publish it on the Company's public facing website; schedule periodic reviews and assessments of the Code; and, where warranted, recommend any proposed changes to the Board for its consideration.
Board of Directors	See Section 1 above.

## 7. Document Control

### 7.1. Document Approver

Title or Role	Approver Name	Signature	Date
Board of Directors	The Board of Directors	[see approved resolutions]	August 1, 2014

### 7.2. Document Reviewers

Title or Role	Reviewer Name	Signature	Date
Secretary	Philip C. Maynard	/s/ Philip C. Maynard	August 1, 2014

### 7.3. Document Distribution and Notification

#### 7.3.1. Distribution

The approved document must be distributed to all approvers and reviewers listed above.

#### 7.3.2. Notification

The following users/groups need to be notified of the publication of this document:

User/Group	Reason
Legal / Compliance	Incorporate into Compliance Program document repository and calendar for periodic review. Also, assess whether any modifications are material enough to trigger 8-K public disclosure obligations.
Human Resources	Publish on Intranet site – update links in Company handbook.
Marketing	Replace prior version of the Code with a properly redacted (i.e., removal of internal review history) version of the updated Code.
Independent Public Accountants	For their records.

END OF DOCUMENT