AMERICAN REGISTRY FOR INTERNET NUMBERS, LTD.
CODE OF CONDUCT FOR VOLUNTEERS

1. PURPOSE

1.1 ARIN Volunteers share a commitment to nurture and safeguard the American Registry for Internet Numbers, Ltd.'s ("ARIN") reputation and to act in the best interests of the organization.

1.2 ARIN's success requires a productive and safe working environment for all participants. Trust and mutual respect among members of the ARIN community are essential for providing the necessary environment. To this goal, Volunteers are expected to behave in a manner consistent with the guidelines set forth in this Code of Conduct ("Code").

2. APPLICATION

2.1 "Volunteer" is defined as and applies to all ARIN Volunteers, to include Board of Trustees, Advisory Council, and Number Resource Organization – Number Council members. Volunteers will be provided with a copy of this Code, and will be requested to sign a written acknowledgement on an annual basis confirming their receipt, understanding of, and agreement to comply with the Code, which is a condition of their volunteer service.

2.2 This Code applies to ARIN Volunteers when they are at any ARIN or Internet industry meeting, conference or event, or when they are in the presence of individuals known to them to be members of the ARIN community, regardless of whether their expenses are paid for by ARIN. This Code does not address the conduct of Volunteers at private events that are unrelated in any manner to ARIN or the Internet industry.

3. GENERAL PROVISIONS

3.1 Everything we do in connection with our work at ARIN is measured against the highest customary standards of ethical and professional behavior. ARIN's commitment to these highest standards helps bring great people into the ARIN community and encourages their lasting participation.

3.2 ARIN Volunteers must avoid any conflicts of interest, which includes activity on the part of a Volunteer that is adverse to ARIN, including activity that will or will likely expose ARIN to a lawsuit or would manifestly bring the organization into disrepute. In addition, Volunteers should be aware of circumstances where there may not be an actual conflict but there may be the perception of one. Volunteers should, where appropriate given the nature and materiality of the issue and having regard to how the situation might be perceived by others, disclose the potential perceived conflict.

3.3 ARIN Volunteers must be generally aware of ARIN's employment policies applicable to the Volunteers and conduct themselves in a manner consistent with those policies and this Code. Applicable ARIN employment policies are noted in Appendix A, where references to "employee" should be considered a reference to "volunteer". They also need to be aware of and comply with applicable laws, rules and regulations, and must never knowingly violate these laws.

4. POLICY AGAINST HARASSMENT

4.1 Every member of the ARIN community and broader Internet community is entitled to fair treatment, courtesy, and respect. ARIN strongly disapproves of and will not tolerate harassment of any of its participants, members, employees, officers, Volunteers, or Internet industry participants (collectively, the "ARIN community"). The ARIN community includes not only those directly involved with ARIN but also those throughout the Internet industry with whom ARIN Volunteers engage in any manner.

4.2 ARIN is committed to maintaining an environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment. Actions, words, jokes, or comments based on an individual's gender, race, creed, color, national origin, nationality, ancestry, marital status, age, religion, disability, sexual orientation, gender identity, or any other legally protected characteristics (all as defined and protected by applicable law) will not be tolerated. It is the responsibility of all Volunteers to assist ARIN in providing an environment that is free from harassment and commit to not engage in offensive or inappropriate harassing behavior and to report incidents of such behavior.

4.3 ARIN prohibits harassment in any form -- verbal, physical, or visual -- which includes slurs and any other offensive remarks, jokes, or verbal, graphic, or physical conduct. Sexual harassment is not limited to demands for sexual favors. It also may include actions such as:

- Sexually-oriented kidding, teasing, gestures, or jokes;
- Offensive or unwelcome sexual flirtations, advances, or propositions;
- Verbal abuse of a sexual nature;
- Graphic or verbal comments, epithets, or slurs about an individual's body;
- Sexually degrading words used to describe an individual;
- The display or transmission (e.g., e-mail, text, or social media) of sexually suggestive or sexually explicit materials (such as magazines, videos, pictures, cartoons, or posters);
- Inquiries into another individual's sexual experiences and activities or discussion of one's own sexual experiences and activities; and
- Unwelcome intentional touching of another person or other unwanted intentional physical conduct.

4.4 Any member of the ARIN community who feels that they have been, or are being, harassed by another member should immediately notify any of the following: the Chair of the Board, the President and CEO of ARIN, ARIN's Chief Human Resources Officer, or ARIN's General Counsel. If a Volunteer wishes to anonymously report an issue, including any misconduct and/or violation of ARIN's policies, ARIN also offers an

anonymous toll-free whistleblower hotline service administered by a third-party vendor, NAVEX Global EthicsPoint. If a Volunteer wishes to anonymously report any misconduct and/or violation of ARIN's policies, NAVEX Global EthicsPoint can be reached at 1.844.910.2311.

4.5 All complaints of harassment that are reported will be investigated as promptly as possible. All complaints of harassment that are reported will be treated with as much confidentiality as possible, consistent with the need to conduct a thorough investigation.

4.6 ARIN prohibits retaliation against any ARIN community member who complains about alleged inappropriate behavior, even if sufficient evidence is not found to substantiate the complaint. ARIN also prohibits retaliation against any ARIN community member who participates in an investigation of a harassment complaint. An ARIN community member will not be penalized in any way for reporting, in good faith, an incident of harassment.

5. VIOLATIONS OF CODE OF CONDUCT

5.1 Violations of this Code may result in disciplinary action which correlates with the nature and gravity of the violation. Volunteer Performance Review and Escalation Guidelines can be found in Appendix B. Discipline may include a reprimand, limitation of Volunteer duties, removal of a Volunteer, and/or any other measure deemed necessary by ARIN to maintain a productive and safe working environment for all participants.

5.2 ARIN Volunteers are expected to adhere to the highest standards of behavior and decorum. A Volunteer's failure to comply with ARIN Participants Expected Standards of Behavior Policy may constitute a violation of this Code. Prohibited conduct includes making statements while in an ARIN capacity that may be considered slanderous or libelous if not true, including making accusations of criminal conduct in the absence of an indictment or conviction.

6. CONFIDENTIALITY

6.1 All information acquired by an ARIN Volunteer concerning ARIN personnel matters, financial matters, legal matters, member status issues, or any other item of ARIN business that is designated by the President and CEO, Chair of the Board, or General Counsel as being confidential in nature shall be held in the strictest of confidence and shall not be divulged to any outside party, including other ARIN members, without prior authorization by the President and CEO, Chair of the Board, or General Counsel. ARIN Volunteers will, from time to time, receive information relating to an alleged violation of this Code that if disclosed to anyone could reveal the identity of an ARIN community member and could be embarrassing to an ARIN community member, harmful to the interests of ARIN, or even create legal liability for ARIN. This confidentiality provision does not supersede, but rather supplements, the non-disclosure agreement signed by each Volunteer.

ACKNOWLEDGMENT OF RECEIPT

I acknowledge that I have received a copy of this Code of Conduct and agree to comply with it.

_____ _____
SIGNATURE DATE

_____
PRINTED NAME

APPENDIX A
ARIN Employee Handbook Applicable Policies to Volunteers
DATE: 13 January 2026

1. Business Ethics and Conduct/Whistleblower Policy
2. Anti-Fraud Policy
3. Information Technology (IT) Acceptable Use Policy

APPENDIX A

1. Business Ethics and Conduct/Whistleblower Policy

The successful business operation and reputation of ARIN is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of ARIN is dependent upon our customers' and members' trust and we are dedicated to preserving that trust. Employees owe a duty to ARIN, its customers, and members to act in a way that will merit the continued trust and confidence of the public.

ARIN will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and company policies, and to refrain from any illegal, fraudulent, wasteful, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your Department Director for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of every ARIN employee. Appropriate disciplinary action may be taken against any employee willfully violating this policy.

To the extent any employee believes that the standards and requirements of this policy are being violated, that employee should notify any of the following: Board of Trustees Chair, President/Chief Executive Officer, Chief Human Resources Officer, or General Counsel.

If an employee wishes to anonymously report an issue, ARIN also offers an anonymous toll-free whistleblower hotline service administered by a third-party vendor, NAVEX Global EthicsPoint. If an employee wishes to anonymously report any misconduct and/or violation of company policies observed at ARIN, NAVEX Global EthicsPoint can be reached at 1.844.910.2311.

There will be no retaliation against any employee for making a complaint or report of perceived violation of ARIN business policies or conduct contrary to this policy, and there will be no retaliation against any employee for cooperating in an investigation into any report made under this policy.

2. Anti-Fraud Policy

Background

This policy is established to facilitate the process and controls which will aid in the detection and prevention of fraud or other improprieties that impact the ARIN Corporation. It is the intent of ARIN to promote consistent understanding and behavior throughout this organization by providing guidelines and assigning responsibility for the development of controls and conduct of reviews related to any possible fraud.

Scope
This policy applies to any fraud, or suspected fraud or wrongdoing, involving employees as well as consultants, vendors, contractors, and any other entity or individual with a business relationship with ARIN. Those who seek number resources from ARIN would fall within this policy.

ARIN management is responsible for creating policies and practices intended to detect and prevent fraud, misappropriations, false data entries and other inappropriate conduct. Each member of the management team must be familiar with the types of improprieties that might occur within their area of responsibility, and be alert for any indication of irregularity.

Any fraud or potential fraud that is detected or suspected must be reported immediately to ARIN's General Counsel, Chief Human Resources Officer, or the Chief Operating Officer, who will act as ARIN's Fraud Investigation Coordinator with regard to specific issues reported to them as applicable.

Prohibited Actions
Actions constituting fraud and other prohibited or improper activities which impact ARIN include, but are not limited to, the following:
*Forgery or alteration of any document or account;
*Forgery or alteration of a check, bank draft, or any other financial document;
*Misappropriation of funds, supplies, or assets;
*Impropriety in the handling or reporting of money or financial transactions;
*Disclosing ARIN trade secret(s), confidential, and proprietary business information to outside parties;
* Improper use of ARIN equipment or services to acquire information on organizations or individuals that is not related to ARIN business;
*Misuse of any vendor services for personal use;
*Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to ARIN;
*Knowingly providing IP address space allocations/assignment inconsistent with ARIN policy;
*Destruction, removal or inappropriate use of ARIN records, furniture, fixtures, and equipment;
*Any dishonest or fraudulent act; and
*If there is any question as to whether an action constitutes fraud, or other impermissible conduct, ARIN personnel should contact the ARIN Fraud Investigation Coordinator. As used in this policy, fraud has its normal dictionary definition.

ARIN Investigation Responsibilities
The ARIN Fraud Investigation Coordinator has responsibility for the thorough investigation of each suspected fraudulent act as defined in the policy. If an investigation substantiates that fraudulent activities have occurred, the Fraud Investigation Coordinator will issue a report to the President/Chief Executive Officer, and will utilize ARIN General Counsel as appropriate.

Decisions by the Company to refer results of any investigation to the appropriate law enforcement and/or regulatory agencies for independent investigation shall be made in coordination with the President/Chief Executive Officer and ARIN General Counsel.

Any review activity required for compliance with this policy will be conducted without regard to the position or title of any ARIN employee, board member or outside business interest.

Confidentiality
Any employee who suspects dishonest or fraudulent activity will notify the ARIN's General Counsel, Chief Human Resources Officer, or the Chief Operating Officer (immediately). Employees should not attempt to personally investigate such matters, or otherwise contact the suspected individual in an effort to determine facts or demand restitution. Investigation results will not necessarily be disclosed or discussed with anyone other than those who have a legitimate need to know. Potential fraud issues will be investigated to the fullest extent.

Authorization for Investigating Suspected Fraud
The Fraud Investigation Coordinator is hereby granted:
*Appropriate and necessary access to all Company records and premises; and
*The authority to examine, copy, and/or remove all or any portion of the contents of files, computers, hard drives, databases, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities when it is within the scope of their investigation. All files shall be maintained in accordance with Company's Document Retention and Disposition policy outlined below.

Reporting Procedures
Great care must be taken in the investigation of suspected improprieties or wrongdoings so as to avoid mistaken accusations or alerting suspected individuals that an investigation is underway until it is appropriate to do so.

An employee who discovers or suspects fraudulent activity will contact the General Counsel, Chief Human Resources Officer, or Chief Operating Officer immediately. All inquiries concerning the activity under investigation from the suspected individual, their attorney or representative, or any other inquirer, should be directed to the General Counsel, Chief Human Resources Officer, or the Chief Operating Officer immediately.

Termination
Any ARIN employee who commits fraud or other improprieties against ARIN or others in the course of their employment will be disciplined or terminated for these violations as is necessary.

3. **Information Technology (IT) Acceptable Use Policy (select provisions – applicable to the use of ARIN systems)**

Use of Social Media
Increasingly, public social media sites (such as LinkedIn) blur the lines between professional and personal use. ARIN actively participates in the world of social media and encourages the participation of its employees in social media and discussion forums, as long as company policies for usage are followed. However, information posted on social media reflects on the individual and can impact their professional life. Consequently, staff should use discretion when posting information to social media and remember that once information is posted, it can be captured and used in ways not originally intended and is impossible to retract, as it often lives on in copies, archives, backups, and memory cache. Therefore, there should be no expectation of privacy.

The use of official social media accounts to manage the organization's public social media presence will only be used by ARIN's Communications Team. Those accounts are privileged accounts and must be treated as such. Passwords of privileged accounts must follow information security standards, be unique on each site, and must not be the same as passwords used to access other resources. Multi-factor authentication should be enabled, where possible.

Coordination through the Communications Team is not required for postings to public forums for vendor technical support, if participation in such forums is within the scope of the user's official duties, has been previously approved by their supervisor, and does not include the posting of any sensitive information, including specifics of the IT infrastructure.

Where staff use a personal account to support ARIN through reposting of ARIN announcements, events, or job openings, no review or approval is necessary. However, the same rules for Internet usage apply to social media and other discussion forums. Employees should conduct themselves in a responsible, professional, and secure manner regarding references to ARIN and staff. Users should respect the privacy of other staff and not post any identifying information of any staff without permission (including, but not limited to, names, addresses, photos, videos, email addresses, and phone numbers).

If a personal email, posting, or other electronic message could be construed to be an official communication, a disclaimer is strongly recommended. An example of an appropriate disclaimer is: "The views and opinions expressed are those of the author and do not necessarily reflect those of the organization."

Bring Your Own Device

ARIN grants employees the privilege of using personal smartphones to support their work. The employee is expected to use their devices ethically at all times and adhere to the remainder of the company's IT Acceptable Use Policy. ARIN defines acceptable business use as activities that directly or indirectly support the business of ARIN.

Devices and Support

- The following devices are authorized:
    - iPhones
    - iPads
    - Android
    - Blackberry
    - Windows
    - Google
- Rooted (Android) or jailbroken (iOS) devices are strictly forbidden from accessing the network.
- Connectivity issues are supported by Information Systems and Security (ISS); employees should contact the device manufacturer or their carrier for operating system or hardware-related issues.
- Employees shall ensure password/pin/biometric locks are enabled on the device.
- Employees shall ensure that they maintain the latest OS and updates on their device at all times.
- Devices must be encrypted and locked to store confidential company data.

Risks/Liabilities/Disclaimers

- ARIN reserves the right to disconnect devices from ARIN resources or disable services without notification.
- Work-related texting, emailing, or messaging is not permitted while driving; only hands-free talking while driving is permitted.
- The employee assumes full liability for risks including, but not limited to: the partial or complete loss of company and personal data due to an operating system crash, errors, bugs, viruses, malware, and/or other software or hardware failures, or programming errors that render the device unusable.
- The employee is personally liable for all costs associated with a personal device.
- Lost or stolen devices must be reported to ISS within 24 hours. Employees are responsible for notifying their mobile carrier immediately upon loss of a device.
- ARIN retains the right to remotely wipe all data from a device in the event of employee termination, data or policy breach, if deemed necessary.
- While ISS will take every precaution to prevent an employee's personal data from being lost, if a device must be remotely wiped, it is the employee's responsibility to take precautions with personal data, such as backing up email, contacts, etc.

Violations

ARIN takes the issue of security seriously. Employees who use company technology and information resources must be aware that they can be disciplined if they violate this policy. Upon violation of this policy, an employee may be subject to discipline up to and including discharge. The specific discipline imposed will be determined on a case-by-case basis, taking into consideration the nature and severity of the violation of the Security Policy and/or Acceptable Use Policy, prior violations committed by the individual, state and federal laws, and all other relevant information. Discipline which may be taken against an employee shall be administrated in accordance with any appropriate rules or policies and the Employee Handbook.

In a case where the accused is not or is no longer an employee of company, the matter may be submitted to law enforcement agencies and/or prosecutors for consideration as to whether criminal charges should be filed against the alleged violator(s).

APPENDIX B
ARIN Volunteer Performance Review and Escalation Guidelines
DATE: 13 January 2026

Purpose

These guidelines establish a structured process for addressing performance-related concerns for the ARIN Volunteer groups consisting of the Board of Trustees, Advisory Council (AC), and Number Resource Organization – Number Council (NRO-NC). The goal of this policy is to ensure accountability and foster the integrity of the ARIN Volunteers, as well as to provide a fair, transparent and consistent approach to performance issues while avoiding the appearance of any action being arbitrary or reactive. These guidelines may also inform the qualification process for election.

Scope

This document applies to all ARIN Volunteers and covers the following performance issues:

- Late submission of expense reports
- Excessive absences from relevant meetings or activities
- Violations of the Volunteer Code of Conduct
- Disruptive behavior during meetings
- Lack of preparedness for meetings (e.g., failure to review materials in advance)
- Other performance issues not outlined above

Performance Review Process

A. Informal Resolution

1. If a performance issue arises, the Chair of the relevant volunteer group or a designated officer may provide informal feedback to the ARIN Volunteer, outlining the concern and offering an opportunity for self-correction.

2. If the issue is resolved at this stage, no further action is necessary.

B. Formal Review Process and Thresholds

1. A formal review is initiated if an ARIN Volunteer exhibits repeated performance issues or a single serious incident occurs. Thresholds for triggering a review may include:
    - Three consecutive unexcused absences from meetings
    - Two or more late expense report submissions within a six-month period
    - A documented violation of the Volunteer Code of Conduct
    - Persistent failure to prepare for meetings

2. The Board Chair, in consultation with relevant stakeholders (such as the President and CEO, General Counsel, and Chief Human Resources Officer), will review the concerns and determine appropriate next steps.

3. The ARIN Volunteer will be notified in writing of the review and given an opportunity to respond.

C. Corrective Action

1. If the review determines that corrective action is needed, possible steps may include:
    - A formal warning issued by the Board Chair or President and CEO
    - A development plan, including mentorship or training, if applicable

- Temporary removal from specific ARIN Volunteer responsibilities
- Suspension of any ARIN-sponsored travel

2. The ARIN Volunteer will be given a defined period to demonstrate improvement, after which progress will be reassessed.

3. ARIN always reserves the right to move directly to the final escalation and documentation step in cases of severe incidents.

D. Final Escalation and Documentation

1. If corrective actions are ineffective or the issue persists, the Board Chair or President and CEO may take further steps, including:
    - Private remediation discussions with the ARIN Volunteer
    - Recommendation for censure[1] of the ARIN Volunteer
    - Documentation of the issue in an internal file for future reference, including election evaluations
    - Recommendation to initiate procedures for removal of a Volunteer from the applicable group

2. Documented performance issues will be reviewed as part of the ARIN Volunteer's qualification process for members seeking election.

Confidentiality and Fairness

ARIN will maintain confidentiality for any of these matters to the greatest extent possible. All reviews and corrective actions will be conducted with discretion and fairness. ARIN Volunteers will have the right to present their perspective, and all decisions addressed by these guidelines will be based on documented evidence.

Policy Review and Updates

These guidelines will be reviewed periodically and amended as necessary by the Board to ensure they remain effective and aligned with best governance practices.

[1] Defined as a formal expression of disapproval issued by a body, without removing the Volunteer from their position or limiting their voting rights.