

**FireEye, Inc.**  
**Summary of Changes to Code of Business Conduct and Ethics**

On February 9, 2017, the Board of Directors of FireEye, Inc. approved a revised Code of Business Conduct and Ethics. The following summarizes the changes:

- Revised to have less legalese and be more user friendly with links to other FireEye policies and updated formatting and graphics;
- Includes additional recommended policies including anti-money laundering, employee data privacy, social media, environmental responsibility, and fair labor practices;
- Includes CEO “tone from the top” introduction regarding importance of doing business with integrity;
- Incorporates FAQs with hypothetical examples to drive understanding of compliance issues;
- Updated reporting recommendations to address transition from pre-IPO startup to maturing public company; and
- Other technical, administrative and non-substantive and conforming changes.

On July 26, 2018, the Board of Directors of FireEye, Inc. approved a revised Code of Business Conduct and Ethics. The purpose of the amendment was to reflect administrative and non-substantive changes.