

Business Practices Standard of Excellence

Our Code of Conduct



Dear Colleague:

You and I are part of a company that is committed to integrity in all that we do. We have a shared responsibility to make compliance and good business practices part of the fabric of CA. It's a responsibility I, along with the Senior Leadership Team, take very seriously and I know you do as well.

We also have a responsibility to communicate what it means to be a member of the CA Team and to understand and abide by the behaviors expected of each of us. To do that, we've developed the enhanced Code of Conduct — "Our Code of Conduct". We use the word "our" rather than CA because we are the people who will make this Code a true reflection of all that is good about the company. After all, we **are** the company.

The Code includes very important information about our dealings and communication with each of our audiences, our fundamental business rules, and our unwavering commitment to doing what is right and complying with the law. It is also meant to provide you with the avenues of communication that you have available if you suspect wrong doing.

Please take the time to read the Code in its entirety. If you have any questions, concerns or suggestions, please contact Pat Gnazzo, our Chief Compliance Officer, or any member of his team. (<http://canet.ca.com/compliance/contacts.htm>)

We've worked hard to enhance our reputation in the market and I thank you for the role you've played in helping us do that. If I can be of assistance to you personally, please let me know.

Regards,

A handwritten signature in black ink that reads "John Swainson". The signature is fluid and cursive, with a small dot above the "i" in "Swainson".

John Swainson

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*Integrity and Respect
are the foundational
values of CA.*

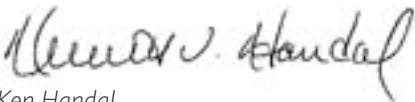
Dear Colleague,

Welcome to CA's revised Code of Conduct, "Our Code of Conduct". The Code has been re-written, not as an all encompassing document to cover every workplace or ethical dilemma you may be faced with, but as a framework to assist you in recognizing issues and understanding how to deal with them. It is this awareness that will provide you with a strong foundation of ethical standards on which CA will build its business and upon which you will develop professionally.

The Code also directs you to the tools, resources and avenues of communication available to all employees faced with ethical or other workplace dilemmas. It is the responsibility of all CA employees to conduct business with the highest ethical standards; to this end, we encourage all employees to raise any issue that concerns them — ethical or otherwise. As the Code explains in greater detail, CA will not permit any retaliation against any employee who raises concerns about the manner in which CA conducts its business. Any employee who feels he/she has been the victim of retaliation should feel free to contact me or the Business Practices and Compliance organization directly.

I urge you to read the Code and use it as a reference tool in your daily business life. While no document can address every possible issue that you may encounter while performing your job, we have designed the Code to provide you with a starting point with very clear avenues of escalation when you have concerns related to your work.

I encourage you to raise any questions, comments, or concerns about the Code, or CA business practices, to CA's Business Practices and Compliance organization or your local Human Resources representative.

A handwritten signature in black ink, appearing to read "Ken Handal". The signature is fluid and cursive, written over a light blue horizontal line.

Ken Handal

All of our ethical rules and principles are built on CA's shared goals and core values.

CA's commitment to ethics and honest business practices extends to its customers, employees, suppliers, partners, shareholders and communities ("Constituents"). Each of these Constituents plays a vital role in CA's success.

Customers

CA is committed to dealing honestly with its customers and providing them with high quality software solutions at fair prices. When dealing with customers, CA will uphold the highest ethical standards and always operate within the parameters of the law.

Employees

CA is committed to treating its employees fairly and maintaining employment practices based on equal opportunity for all employees. CA employees must respect one another's privacy and treat each other with dignity and respect regardless of age, race, color, gender, religion, nationality, disability status, sexual orientation or any other classification protected by law. CA is also committed to providing a safe and healthy working environment and an atmosphere of open communication for all employees.

Suppliers

CA is committed to dealing fairly with its suppliers. CA will promote fair competition without discrimination or deception.

Partners

CA is committed to partners being treated fairly. All partners should act in accordance with the standards and principles set forth in the Code.

Shareholders

CA is committed to providing a superior return to its shareholders by protecting and improving the value of his/her investment. This will be accomplished through the prudent use of company resources and by observing the highest standards of business practices and ethical conduct in all of our business dealings.

Communities

CA is committed to be a responsible corporate citizen by taking an active leadership role in the communities where it does business. CA encourages and promotes employee volunteerism and corporate philanthropy.

CA's Core Values

Values provide perspective in the best of times and the worst.

As one of the world's leading providers of management software, CA's products and services reach every corner of our customers' businesses. CA customers must have absolute confidence in our integrity, as must our investors, partners and employees.

CA believes that integrity and respect are the foundational values for all that we do and has integrated these principles into its five core values:

- **Innovation:** We are constantly looking for ways to innovate and improve. We embrace change as opportunity.
- **Excellence:** We strive for excellence in all we do. We have a passion for continuous quality improvement. We measure what counts and take action based on facts.
- **Teamwork:** We communicate actively and openly. We build trust by honoring our commitments. We show respect for each other and value diversity.
- **Integrity:** We are honest in all interactions. We earn our reputation by adhering to the highest ethical standards and conduct.
- **Performance:** We recognize and reward outstanding performance. We hold ourselves accountable for achieving our goals.

It is through our Constituents and our core values that we can continue to grow CA's profitability and enhance our position in the global marketplace.

Compliance with the Code is the responsibility of every CA employee. CA encourages all employees to bring issues and concerns forward to management without fear of retaliation.

Application

The Code applies to all directors, officers, employees, contractors, and representatives of CA. Employees who deal with third parties should familiarize themselves with the sections of the Code relating to Consultants, Representatives, Agents, Contractors, Suppliers and Partners.

Management Responsibility

The CEO, with assistance of the Senior Leadership Team (SLT), is responsible for operating the CA business in compliance with applicable laws. The CEO and SLT are responsible for creating and fostering a culture of ethical business practices, encouraging open communication, and for instilling an awareness of and commitment to the Code.

The Senior Vice President, Business Practices, and Chief Compliance Officer has overall responsibility for administering the Code. The Chief Compliance Officer is responsible for:

- Distributing the Code to all employees, directors, officers, and representatives
- Monitoring CA's ethics and business practices company wide
- Resolving issues raised to the Business Practices and Compliance organization
- Overseeing Business Practices and Compliance investigations
- Discussing ethics and business conduct issues with employees and managers throughout CA and the Board of Directors.

Questions regarding the Code, its interpretation or its application should be addressed to the Business Practices and Compliance organization.

Employee Responsibility

CA expects all employees to read and understand the Code. Employees who have questions about the Code should feel free to raise such questions with his/her manager, local Human Resources representative and/or a member of the Business Practices and Compliance organization. It is the obligation of every employee to report suspected violations of the Code to management utilizing the avenues discussed in the "CA's Commitment to Transparency" section of the Code.

Each year, CA will require all employees to acknowledge his/her understanding of the Code and to report any perceived and/or actual conflicts of interest.

Violations of the Code may result in disciplinary action, up to and including dismissal.

Waiver

Only the Board of Directors or a Board of Directors Committee may grant a waiver or amendment to a provision of the Code, which will then be promptly disclosed to all CA shareholders.

Our obligation is to create a corporate culture of transparency and accountability.

CA believes in applying standards of full, accurate and timely disclosure to all its Constituents and the Board of Directors.

CA is committed to operating its business in a manner that encourages employees to openly discuss his/her opinions, attitudes and concerns about the manner in which CA does business. If you have questions or concerns about CA's business practices, CA encourages its employees to speak to his/her manager and/or your local Human Resources representative. If you are uncomfortable speaking to your manager or HR, contact the CA Business Practices and Compliance organization, the Worldwide Law Department or use the *CA Helpline*. The key, for both CA and its employees is that questions and concerns become known so that the question can be addressed and resolved.

CA will not tolerate **any** retaliation against any employee who raises a question or concern about CA's business practices or for utilizing the *CA Helpline*. Employees must understand, however, that using these communication channels to report a wrongdoing will not absolve the employee from accountability for personal involvement in such wrongdoing.

For further information on this subject, see CA policy: ***Compliance and Ethics Helpline Policy***.

CA's Fundamental Business Rules

The fundamental business rules for all CA employees are: Don't Lie, Don't Cheat and Don't Steal.

All of us must:

- Know and follow the laws that apply to us where we are doing business so that we meet our customers' needs by treating them fairly and honestly. That means delivering high-value, high-quality products and services, and supporting everything we sell with the technical and business resources our customers need.
- Avoid real, apparent, potential or perceived conflicts of interest in which your personal interests might conflict with those of CA.
- Respect one another. CA will provide a good and safe place to work. We will help our employees develop his/her talents and use those talents to the fullest. CA will strive to involve its employees in the planning and direction of his/her own work. As an equal opportunity employer, CA makes employment decisions based solely upon a person's qualifications and job performance.
- Safeguard CA's property and property entrusted to CA by others — including all proprietary information, assets and resources.
- Seek mutually beneficial relationships (within the parameters of good business judgment) with consultants, representatives, agents, contractors, suppliers and partners who share our values and principles, and who are prepared to promote them.
- Treat inside information as strictly confidential and not use it for personal gain.

Employee responsibilities are explained in more detail in the following pages. Additional information about CA policies and CA's Code is available on CA's intranet site or at your local Human Resources office.

Compliance with the law is mandatory.

Local Laws and Customs

Because CA conducts its business in over 100 countries, laws, local customs and social standards differ greatly from one place to the next. CA's policy is to abide by the national and local laws of the countries in which it operates, unless such laws or practices violate U.S. law. If local customs and business or social practices differ from the standards contained in the Code, CA employees must consult with the Chief Compliance Officer or his/her local designee or a member of the Worldwide Law Department to determine the proper way for CA to conduct its business in that location/situation.

Following the Law

Every CA employee has the responsibility to understand and abide by the local laws and rules that apply where they are conducting CA business. It is management's responsibility to ensure that employees have the support and resources he/she needs to make this happen. Employees who have questions should contact a member of the Worldwide Law Department.

Communication both internally and externally should never knowingly be false or misleading.

Auditors

Free and forthright communication with internal auditors and CA's external public accounting firms in the course of his/her review is crucial to the goal of assuring proper accounting for all company transactions, assets and liabilities. Accordingly, no employee may **knowingly** make a false or misleading statement to CA's internal auditors or external public accounting firm, nor may any employee conceal, or fail to reveal, information necessary to make the statements true.

Federal, National, State and Local Government Agencies

CA has adopted a policy for responding to federal, national, state and local government agencies that are inquiring about or investigating some facet of CA's business or the business of CA's subsidiaries or affiliates. Employees who become aware of such an inquiry or investigation must report such government agency requests to the Worldwide Law Department and the Chief Compliance Officer. The Worldwide Law Department has primary responsibility for reviewing and coordinating company responses to government agency requests.

For further information on this subject, see CA policy: ***Business Ethics and Conduct in Contracting with Federal, State and Local Governments***. **For further information outside the U.S. please contact your Worldwide Law Department.**

Strong relationships with consultants, representatives, agents, contractors, suppliers and partners are crucial to our success. To preserve and deepen these relationships, we must always act with integrity and respect.

Marketing and Advertising

CA believes in vigorous competition and that honest and truthful company materials help build and maintain our reputation as a leader in the software industry. To this end, all marketing, sales, and advertising should be conducted on the basis of the merits and superiority of CA's products and services and in line with local laws on marketing/advertising. Representations that CA makes in advertising, product packaging and/or other promotional materials must be truthful and accurate. All claims made by CA must be substantiated and should not be false, misleading, or deceptive in any way. Any comparisons to CA competitors should be made without disparaging or inaccurate statements. All advertising and promotions must be reviewed and approved by the Marketing Department and the Worldwide Law Department.

For further information on this subject, see CA policy: ***Marketing, Selling and Advertising Guidelines for Legal Review; and Copyright Policy.***

Suppliers and Contractors

It is CA's policy to purchase all equipment, supplies and services on the basis of merit. CA contractors and suppliers will be treated with fairness and integrity, without discrimination.

CA employees who deal with suppliers or potential suppliers should be familiar with and follow the CA policies regarding Procurement and Conflicts of Interest.

For further information on this subject, see CA policy: ***Business Ethics and Conduct in Contracting with Federal, State and Local Governments. For further information outside the U.S. please contact your Worldwide Law Department.***

Consultants, Representatives, and Agents

Occasionally, CA engages the services of an individual or a firm to consult for or otherwise represent CA in the course of business. CA employees must be especially careful to avoid conflicts of interest between CA and the person or firm being utilized. Consultants, representatives, and agents of CA must not act on CA's behalf in any manner that is inconsistent with the Code or any applicable laws or regulations. All agreements with consultants, representatives, and agents must contain language to assure the Code is followed or equivalent standards are met.

Partners

CA has relationships with resellers, distributors, original equipment manufacturers, internet service providers, and other third parties, who help CA market and distribute its products and services. CA employees who have responsibilities that bring them in contact with these partners must follow the applicable sales, marketing and services **guidelines** that describe the appropriate conduct for dealing with partners.

For further information on this subject, see ***CA Partner Program Intranet site for Guidelines and Templates***.

*If you ever find yourself with a compliance or ethical dilemma, remember you are not alone. Contact your Manager, your Human Resources Representative, the Business Practices and Compliance Organization, Worldwide Law Department or call the **CA Helpline**.*

Obviously, the Code cannot address all possible compliance or ethical dilemmas a CA employee may encounter in his/her career at CA. However, listed on the following pages are some of the situations that CA employees may likely encounter at some point in his/her career.

Remember, these may not be the only compliance or ethical dilemmas that may be encountered.

NOTE: Specific policies and procedures also exist for CA's Finance, Sales, and Worldwide Law Departments on these issues (see specific references at the end of each topic).

Compliance Topics

Anti-boycott

CA complies with the Anti-boycott provisions around the world. These provisions encourage, and in some cases require, persons to refuse to participate in foreign boycotts that are not sanctioned. In the U.S., the U.S. Export Administration Act helps ensure that U.S. firms do not assist in implementing foreign policies of other nations that run counter to U.S. policy.

Any CA employee who receives a request to take any action in support of an unsanctioned foreign boycott must report such request to Company's Chief Compliance Officer or a member of the Worldwide Law Department.

For further information on this subject, see CA policy: **Anti-boycott Policy**.

Anti-Bribery: Foreign Corrupt Practices Act (FCPA) & OECD Treaty Provisions

CA does not offer or pay bribes to government officials.

CA employees working outside the U.S. should be aware that payments of bribes to foreign government officials violate the FCPA and may also violate local laws outside of the U.S. In addition, the FCPA requires CA to maintain

proper accounting controls and keep detailed records about all financial dealings with foreign governments, including payments of any kind.

CA also discourages “facilitating payments” which are made to help ensure that public officials perform tasks they are supposed to perform as part of his/her normal job function (such as issuing licenses or permits). All facilitating payments must be reviewed and approved by a member of the Worldwide Law Department and accurately recorded in the appropriate financial record as a “facilitating payment.”

For further information on this subject, see CA policy: ***Anti-Bribery Policy***.

Antitrust

The U.S., the European Union, countries in Asia-Pacific and many other nations have antitrust laws that are designed to ensure that competition is fair and honest.

Antitrust laws typically prohibit agreements or actions among competitors that might restrain trade or reduce competition. Under most antitrust laws, companies cannot agree with any competitor to:

- Fix or Control Prices
- Boycott Specified Suppliers or Customers
- Allocate Products, Territories or Markets
- Limit the Production or Sale of Products

It is not enough to avoid taking specific actions that violate antitrust laws—employees must not even give the appearance of doing so.

Additionally, where CA has a “dominant” market share in any product area, it may be subject to additional laws that prohibit abuse of its dominant position.

For further information on this subject, see CA policy: ***Worldwide Antitrust/Competition Policy***.

Business Ethics and Conduct In Contracting with Federal, National, State and Local Governments

CA organizations that contract directly or indirectly with federal, national, state or local government agencies around the world are required to comply with all applicable procurement and government relations laws and regulations and maintain current, detailed policies and procedures, which expressly designate the department or activity responsible for implementing each element of the policy and/or procedure. Accordingly, CA has implemented an ongoing program of communication and training to ensure compliance with CA's policy on this activity.

For further information on this subject, see CA policy: ***Business Ethics and Conduct in Contracting with Governments***. For further information outside the U.S. please contact your Worldwide Law Department.

Export and Import

CA follows all national and multinational export and import control laws that apply to its products and services. For instance, the U.S. and the European Union have laws that control which technologies may be exported and where the technologies may be exported. These laws may also prohibit CA's subsidiaries outside the U.S. from re-exporting certain CA products to certain countries. Exports can occur through telephone calls, emails or downloads of software. Exports can also occur when technical data is disclosed to a non-U.S. person, including a CA employee, within the physical boundaries of the U.S.

CA employees engaged in transactions involving export/import of CA products outside country boundaries should be familiar with the rules governing such transactions. Employees involved with these types of transactions must familiarize themselves with CA's policies on export/import or contact a member of the Worldwide Law Department with any questions.

For further information on this subject, see CA policy: ***Export and Import Controls***.

Financial Reporting

As a publicly traded U.S. company, CA must comply with various securities laws, regulations and reporting obligations. U.S. federal laws and CA's associated policies and procedures require that CA disclose accurate and

complete information regarding its business, financial condition and results of operations. Inaccurate, incomplete, or untimely reporting will not be tolerated and may result in legal liability.

CA's principal financial officers, members of the Disclosure Operating Committee, members of the Executive Disclosure Risk Oversight and Compliance Committee and Finance department employees have a special responsibility to ensure that all financial disclosures are full, fair, accurate, timely and understandable. All employees involved with financial reporting must understand and strictly comply with U.S. Generally Accepted Accounting Principles (GAAP), and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

Of course, these are just a few examples. The fundamental rule for financial reporting is: do nothing that would mislead or misinform anyone about CA's finances.

For further information on this subject, see CA finance manual: ***Finance & Administration Policy & Procedures Manual***.

Human Resources

CA believes that its employees are its most important asset. CA will promote a professional and congenial work environment that encourages teamwork and professional development of all its employees. CA is committed to taking the necessary steps to ensure that its work environment remains free of harassment. CA employees must always project the highest level of integrity and treat one another with courtesy, consideration and professionalism. To that end, CA will not tolerate and further prohibits:

- Harassment of any employee, which would include harassment directed at an employee because of that person's race, color, gender, age, religion, ancestry, national origin, citizenship status, marital status, sexual orientation, medical condition, disability, pregnancy, veteran status or any other classification protected by law.
- Sexual harassment, which includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal, graphic or physical conduct of a sexual nature.

- Retaliation of any type against an employee for reporting or participating in an investigation regarding any type of harassment or discrimination.

Employees who believe he/she has been the victim of discrimination or harassment should immediately report such conduct to his/her Human Resources representative or the *CA Helpline*.

For further information on this subject, see **your local Human Resources policies and procedures, your Human Resources handbook; or contact your local Human Resources representative.**

Privacy

CA will protect the privacy rights of its employees company-wide. CA respects these rights whenever it collects, processes, uses and stores employee personal information.

Specifically, CA intends to collect, use, and retain employee personal information only as needed to effectively operate the company and/or as required by law in the jurisdictions in which CA operates. Only those who have a legitimate business need to view personal information will be granted access to it. Employees who have access to personal information of other employees must maintain its confidentiality. No CA employee may provide another employee's personal information to anyone outside of CA without proper authorization.

For further information on this subject, see CA policy: ***Employee Privacy: Safe Harbor***.

Inside Information (Trading)

Inside information is anything an employee has learned in connection with his/her employment at CA and that has not been revealed publicly but would be considered important by investors when making investment or trading decisions. Examples of inside information include (but are not limited to):

- Information that CA is about to win or lose a large contract.
- Information that CA is about to announce a major change in strategy or an important new product.
- Information that CA is about to acquire a company or sell a division or product.

- Information about quarter-end or year-end financial data not yet publicly disclosed.
- Information that CA is about to repurchase shares, change dividend policies or announce a stock split.
- Information about developments in lawsuits or regulations that will significantly impact CA.
- Any similar information about a CA customer, supplier, or business partner, such as an impending joint venture.

It is inside information even if the information is discovered by accident.

Employees and anyone in his/her closely related family or household are prohibited from making stock trades based on inside information. Employees may not disclose inside information to anyone or even suggest to anyone that it might be a good time to buy or sell CA stock, based on inside information.

Employees having access to inside information should consult with a member of the Worldwide Law Department before making any trades or sharing any information.

For further information on this subject, see CA policy: ***Policy Against Insider Trading and Tipping; and Policy on Communications with Outsiders and Compliance with SEC Regulation FD.***

Lobbying

CA complies with all laws and regulations regarding lobbying. While lobbying may be defined differently in various countries, it generally includes contact with government officials for the purpose of influencing legislation or rulemaking. When dealing with the U.S. Federal Government, CA must report to the U.S. Government an individual's contact with legislators, executive branch officials or their staff, government contract sales or marketing, and/or government procurements for specific purposes. Before employees engage in any contact with government officials or other lobbying activity, including engagement of third-party consultants, the employee must obtain the approval of CA's Government Relations Department and receive training on what is or is not appropriate in this area.

For further information on this subject, see CA policy: ***Lobbying and Government Relations Policy.***

Business Practices Topics

Conflicts of Interest

A conflict of interest is anything that might cause an individual's private interest to interfere in any way— or even appear to interfere — with the interests of CA. A conflict situation can arise when an employee's actions or interests make it difficult to perform company work objectively and effectively. It is anything that might deprive CA of an employee's undivided loyalty as he/she does business on its behalf.

Employees may encounter a conflict of interest if he/she:

- Recommends, influences, buys or sells property, goods, or services on CA's behalf.
- Knows or has access to confidential CA information, processes or activities.
- Accepts gifts, gratuities or entertainment from individuals or companies that do business or want to do business with CA. CA's policy as it relates to gifts, gratuities and entertainment is:
 - CA employees may not receive gifts, gratuities, or entertainment of more than \$200 US fair market value per fiscal year collectively from an individual customer, supplier, or partner, without approval from his/her manager and the Business Practices and Compliance organization. Any individual gift with a value of \$200 US fair market value or more being given to a customer, vendor or partner, must be reported to the individual's manager and the Business Practices and Compliance organization.
 - CA must respect the gift rules of its customers, vendors and partners. CA employees shall not give anything of value to those who have policies that prohibit them from receiving such gifts.
 - CA employees must keep in mind that when giving gifts that are permitted, the gift must be culturally reasonable in cost and frequency.
- Receives gifts of a value of \$200 US fair market value or more (cash, gift cards, or other items of value) from another CA employee(s) for business related purposes. These gifts must be reported to the employee's supervisor and the Business Practices and Compliance organization.

- Works in the Procurement organization, or any employee in CA who is performing procurement, sourcing, supplier/partner selection or supplier/partner management function or in a role which may influence any of these functions. The restrictions regarding the receiving of gifts for individuals in these capacities are more restrictive. Such employees may only accept:
 - Beverages, light snacks, and business meals served during business meetings held at the facilities of customers, suppliers and partners
 - Business meals while in travel status
 - Promotional or advertising items of truly nominal value, such as ball caps or pads of paper
 - Any other gift, entertainment or gratuity if reported to and approved by the Business Practices and Compliance organization
- Participates in romantic and/or familial relationship between supervisors and employees in which the parties are within the same supervisory chain.
- Participates as an owner, employee, officer, or director of another company.
- Owns in excess of 5% of a competitor, supplier, or partner.
- Owns stock in excess of 5% of his/her net worth in a competitor, supplier, or partner.
- Participates in a "Corporate Opportunity". Employees, officers, and directors are prohibited from:
 - Taking for themselves personally opportunities that are discovered through the use of corporate property, information, or position;
 - Using corporate property, information, or position for personal gain; and
 - Competing with CA.

Employees having a conflict of interest or facing a potential conflict of interest should notify his/her manager and the Business Practices and Compliance organization for guidance.

For further information on this subject, see CA policy: **Conflicts of Interest Policy**.

Community Involvement and Political Contributions

CA encourages its employees to be involved in civic affairs and the political process. Personal contributions to civic organizations and political candidates and parties are entirely consistent with CA's commitment to good citizenship and community involvement. However, employees are prohibited from contributing CA's funds, property, or services to any political party, committee or candidate for any governmental office.

Prohibitions include (but are not limited to):

- Use of company email or mailing lists to promote a candidate.
- Use of company time to perform volunteer work for political candidates.
- Pressuring any colleague, supplier, customer, or partner to make any political contribution or support any political party or candidate, even implicitly. For example, you cannot ask your subordinates to purchase tickets to a political fund-raiser.

For further information on this subject, see CA policy: ***Lobbying and Government Relations; and CA Corporate Contribution Policy.***

Proprietary Information (Intellectual Property)

CA's Intellectual Property is the heart of its success and includes:

- Copyrighted materials
- Patents
- Trademarks
- Trade secrets
- Confidential information
- Company private information
- Competition sensitive information
- Proprietary information, including bid information and pricing data
- Technical data
- Confidential information from customers, suppliers, partners, and other third parties

CA expects each employee who has or may have access to proprietary information to maintain its confidentiality and not to disclose it unless provided written authorization to do so by a company official with appropriate authority.

For further information on this subject, see CA policy: ***Intellectual Property Policy; Records Security and Confidentiality Policy; and Copyright Policy.***

Records and Information Management

CA is responsible for ensuring that its business records, in any medium, including hard copy and electronic, are created, managed, and disposed of properly. An effective, efficient records and information management program allows CA to meet its business needs as well as comply with all legal and regulatory obligations. CA employees must familiarize themselves with and abide by the Records and Information Management Policies and Procedures.

For further information on this subject, see CA policy: ***Records and Information Management (RIM) Policies.***

Use of Company Resources

CA expects every employee to be prudent about expenditures of company money. Employees must use good judgment and discretion when using any company or customer-owned resources, including computers, telephones, internet access, email, voicemail, copiers, fax systems, vehicles, or other equipment and facilities.

CA realizes that minor, incidental and infrequent personal use of company assets is sometimes inevitable and will accept such use as long as it does not compromise the company's interests. Personal use is not acceptable if it significantly depletes the value of a company asset, adds significant costs to the company, interferes with productivity of the employee or places the company at risk of liability.

For further information on this subject, see CA policies: ***Use of Company Resource policies; and Electronic Information and Communications Policy.***

Doing what is right is absolutely essential to our long-term success, both as a company and as individuals. We all want to do the right thing. With common sense, vigilance and teamwork, we can—and we will.

The Code is not all encompassing. If you have any questions or concerns, remember you have numerous avenues to have your questions answered. Again, CA encourages you to speak to your manager; contact your local Human Resources Representative; and if you wish to remain anonymous, contact the *CA Helpline*. It is your responsibility to ask questions when you have a concern and to report issues. Sound business practices and compliance with laws are the responsibility of all CA employees.

**Business Practices and Compliance Organization
Contact Information**

CA Helpline: **(800) 648-8014** (U.S.)
 URL: **http://canet.ca.com/legal/global_helpline.pdf** (International)

Chief Compliance Officer +1(631) 342-4520
 Deputy Chief Compliance Officer +1(631) 342-3734
 North America Compliance Officer +1(631) 342-2829
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Business Practices and Compliance Website:
<http://canet.ca.com/compliance/>



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