



Ribbon Communications

Our Approach to Human Rights

Overview

Ribbon is a leading, publicly traded, global provider of communications technology, employing thousands of people operating in more than 100 countries. Using our trusted solutions, our customers can offer services that improve the quality of life for millions of people around the world, support digital inclusion across markets and lower global greenhouse emissions through efficient bandwidth utilization and cloud-based applications.

Upholding individual human rights is fundamental to our operations as a responsible and accountable Company. Respect and empowerment are core Ribbon values. We are passionate in our belief that everyone benefits when we respect and advance each other's human rights: our employees, our customers, our suppliers, and everyone else with whom we interact.

Our Approach

Ribbon Communications, including all subsidiaries, directors, executives and employees, is committed to respecting and upholding human rights in all its activities throughout its value chain in all countries of operation.

The fundamental principles of respect for human rights established in the laws of the countries in which we operate provide a basis for our approach. In addition, we support internationally recognized frameworks and agreements, including:

- The Universal Declaration of Human Rights
- The International Labor Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work and related ILO conventions
- The Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD)
- The United Nations (UN) Guiding Principles on Business and Human Rights

Our commitment to the respect for and advancement of human rights in all areas of our business includes our zero tolerance stance towards human rights violations internally and among our suppliers. We require our employees and supply chain partners to report actual or suspected human rights violations to the Company immediately and we facilitate such reporting via a variety of published reporting channels. See Ribbon's [Code of Conduct](#) and its [Supplier Code of Conduct](#).

Human rights risk assessment

Ribbon conducts risk assessments across all business units and operations as part of its Enterprise Risk Management procedures. Such assessments may be performed by Ribbon's qualified internal auditors or by an appointed third party and include aspects of social compliance, including matters relating to human rights in our workforce and in our extended supply chain. The outcomes of such assessments are communicated to Ribbon's executive leadership as a matter of priority and to the extent they contain calls to action, the Company responds quickly and purposefully to resolve opportunities for improvement.

Upholding human rights in our workplaces

At Ribbon, we are committing to fostering a working environment that is engaging, inspiring, challenging, respectful and inclusive for all who enter our workplaces across the world. By valuing each person and upholding their rights, we demonstrate our appreciation for people as well as our commitment to responsible and sustainable business practices. We uphold fundamental and universally accepted labor rights that include, among others, the:

- Prohibition of child labor: we do not employ persons under the age of 16 anywhere in our business.
- Prohibition of forced or bonded labor: we do not tolerate any form of trafficking or unlawful exploitation of individuals.
- Protection of the right of employees to freedom of association and collective bargaining.
- Prohibition of unlawful discrimination: we have a zero tolerance stance on unlawful discrimination, harassment and retaliation.

We are committed to maintaining a diverse workforce and a culture of inclusion in which all people are welcome. We are passionate about fostering a workplace culture of inclusion and human resources practices that provide equitable treatment in all facets of the employment relationship including hiring, compensation and benefits, development, training, advancement, promotion opportunities, and access to workplace accommodations and facilities. In addition to requiring open and collaborative relations on a daily basis where employees are free to share their concerns with their managers, HR, Legal and other members of senior management, we engage regularly with our employees in a structured way through our annual Employee Satisfaction Survey, regular global townhall meetings hosted by the CEO, and other communication channels to provide employees with a voice with which to share their views about our Company and for Ribbon management to gain insights about ways to improve our working culture and practices. See our [Approach to Employment](#) and our [Approach to Diversity, Equity and Inclusion](#).

Upholding human rights in our supply chain

Ribbon's suppliers are expected to conduct their business in an ethical and legally compliant manner. Ribbon's [Supplier Code of Conduct](#) is a binding commitment in Ribbon's procurement contracts and suppliers are obliged to uphold its provisions, including those relating to respecting the protection of human rights of employees and treating all employees with dignity and respect in their own operations and throughout their own value chain.

As part of Ribbon's ongoing supplier management, we do not knowingly engage suppliers that do not meet Ribbon's legal, financial, environmental, social, human rights and governance standards. Ribbon conducts due diligence on suppliers, including resellers and agents, incorporating periodical screenings, risk

assessments, compliance health checks and financial propriety checks. Specifically, we conduct an annual Environmental, Social and Governance (ESG) Risk Assessment on our critical and Tier 1 Suppliers (including contract manufacturers), and follow up any areas of concern.

We aim to help our suppliers meet our strict supply standards. Where relevant, we provide training and/or other resources to assist suppliers in meeting our standards.

Ribbon also aligns our procurement activities to ISO 20400, the international guidance standard for sustainable procurement. ISO 20400 incorporates the concepts of complicity and due diligence from the UN Guiding Principles of Human Rights and Business and is aligned with the UN Sustainable Development Goals.

See also our Approach to [Responsible Supply Chain Management](#).

Ethical sourcing and conflict-free supply chains

We aim to source products through suppliers that meet our strict social standards as outlined in our [Supplier Code of Conduct](#). Such conduct includes proactive confirmation of the ethical supply of finished goods, components, products and services throughout our supply chain. When our suppliers engage other suppliers in their supply chain, we expect them to apply these same standards. In particular, conflict minerals is a specific area of focus, and we expect suppliers to observe best practice to ensure a conflict-free supply chain for Ribbon, and report transparently about their sourcing of Tantalum, Tungsten, Titanium and Gold (3TG) as per our annual requests to comply with U.S. legislation and disclosure on this topic. See our [Policy on Conflict Minerals](#).

Supporting human rights in our communities

We believe in the transformational power of ‘digital’—expanding access to digital tools and helping people and communities acquire digital skills helps bridge social inequalities and strengthens economic and social life. At Ribbon, we support the right to universal access to digital technologies and the necessity for everyone to acquire the skills to best use and enjoy information technology in today’s digital world. We believe it is important to advance access to and use of digital technologies in markets that are currently underserved as a means to upholding human rights and a key driver of prosperity. To advance digital inclusion, we support access to digital technologies in rural and underserved communities and provide digital capabilities and tools for people in our markets. See our [Approach to Digital Inclusion](#) and our [Approach to Information Security and Data Privacy](#).

Training and education

All Ribbon employees are trained in Ribbon’s [Code of Conduct](#), which provides a strong basis for understanding the need for ethical conduct, including protecting human rights, across all areas of our business in all locations. New employees must agree to comply with our [Code of Conduct](#) as a condition of joining Ribbon and current employees must re-certify each year. For employees in areas of high exposure, such as procurement, we provide additional targeted training on matters relating to human rights.

Reporting human rights concerns: Ribbon employees are empowered to report concerns relating to human rights via a variety of reporting channels including direct access to the Company’s EVP, Chief Legal

Officer as well as well as through reporting options which are made available 24/7/365 on the intranet. Any reports are promptly investigated and appropriate actions undertaken. Ribbon does not tolerate retaliation against employees for making good faith reports.

Similarly, customers and suppliers are encouraged to report concerns relating to human rights, confidentially and in good faith, to Ribbon's Procurement Managers or directly to the Company's EVP, Chief Legal Officer. Any reports are promptly investigated and appropriate actions undertaken.

Supporting Global Sustainable Development

Our approach to human rights directly supports UN Sustainable Development Goal (SDG) 16 which calls for promoting the rule of law at the national and international levels.



- Target 16.3: *Promote the rule of law and ensure equal access to justice*

Governance

Executive direction of our human rights approach is led by Ribbon's Executive Vice President and Chief Legal Officer. Other senior managers also play an important role in ensuring effective organizational controls related to human rights, such as procurement, supply chain management, human resources management and others.

The Audit Committee of the Ribbon's Board of Directors oversees Ribbon's adherence to human rights standards and practices, and reviews human rights concerns with management if and as they arise.

Disclosure

We report transparently to our stakeholders on progress and performance related to human rights in our [annual Sustainability Report](#).

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