Ribbon Communications Slavery and Human Trafficking Statement
2023

Ribbon Communications Inc. (“Ribbon” or the “Company”) works in an energetic global telecommunications industry where the pace is fast and change is constant. But, there are some things that don’t change at Ribbon—our commitment to doing business honestly, ethically, and with respect for people. It is to this end that Ribbon has implemented this Statement on the Prevention of Slavery and Human Trafficking, which mirrors the anti-slavery and anti-human trafficking principles embodied in the Company’s employee Code of Conduct and its Supplier Code of Conduct.

It is paramount to our way of doing business at Ribbon to comply with applicable law and to act with the utmost integrity, honesty, and transparency. Ribbon is committed to acting responsibly in all of our business dealings to ensure that we comply with applicable national and international legislation and industry standards, including laws and standards against slavery and human trafficking. Ribbon will forgo business opportunities rather than act in an unlawful, unethical, or inhumane manner. Preserving an ethical workplace and supply chain that respects human rights is critical to our long-term success as a leading global telecommunications company.

At Ribbon, the message for each Ribbon employee and supplier is clear: Any success that is not achieved lawfully and ethically is no success at all. At Ribbon, we obey applicable law—including laws against slavery and human trafficking—and strive to hold ourselves to the highest ethical and legal standards, and we expect the same of all of our suppliers.

Ribbon’s Business Structure and Supply Chain Relationships

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

Ribbon is headquartered in Plano, Texas and has operations, R&D and resources around the globe that provide world-class support and services for its vast customer base.

As of January 1, 2023, Ribbon directly employs over 3355 skilled employees in 34 different countries, and is an indirect source of work for many workers through its global supply chain.
relationships in, among other countries, Turkey, Mexico, Israel, India, Taiwan, Vietnam, Thailand and China.

Ribbon’s business is real-time communications. It is not a manufacturer (so does not own or operate factories or production plants) nor a handler of raw materials or commodities (so does not own or operate processing plants). However, Ribbon’s business relies on suppliers and complex third-party commercial relationships.

**Ribbon’s Policies against Slavery and Human Trafficking**

Ribbon’s commitment to complying with and supporting laws and moral standards that prohibit slavery and human trafficking is evidenced by the human rights and labor policies contained in its employee Code of Conduct and its Supplier Code of Conduct. These policies are rooted in the law and internationally recognized standards including, for example, the Responsible Business Alliance (“RBA”) Code of Conduct, the United Nations’ Universal Declaration of Human Rights, and the International Labor Organization’s International Labor Standards.

While Ribbon’s policies reflect the law and global standards, they also reflect the unequivocal expectation of the Company’s leadership that its employees and suppliers support its compliance with anti-slavery and human trafficking laws.

Ribbon’s Supplier Code of Conduct directly addresses the labor rights issues associated with slavery and human trafficking. For example, the Supplier Code of Conduct states that:

- Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons may not be used either by any supplier or its contractors, suppliers or subcontractors. This prohibition includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

- There shall be no unreasonable restrictions imposed by suppliers on their workers’ freedom of movement in or beyond supplier facilities.

- All work performed must be voluntary and workers must be free to leave work at any time or terminate their employment.

- Suppliers may not hold or otherwise destroy, conceal, confiscate or deny access by workers to workers’ identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law.

- Workers may not be required to pay suppliers or agents’ recruitment fees or other aggregate fees.
Training Regarding Ribbon’s Anti-Slavery and Human Trafficking Policies

Ribbon has developed measures to ensure that its prohibition of slavery and human trafficking extends beyond its policy documents.

During the new hire onboarding process, individuals wishing to join Ribbon as an employee must certify that they have read the employee Code of Conduct and confirm that they agree to abide by its policies, including its policy against forced labor. Every supplier who wants to do work for Ribbon is required to acknowledge the Company’s Supplier Code of Conduct. Ribbon requires its current employees to complete an annual Code of Conduct review and re-certification process. Completion of this annual re-certification process is a term and condition of continued relationship with Ribbon, in accordance with applicable law.

Ribbon provides suppliers and employees with several avenues to report to the Company any suspected and/or actual violations of Ribbon’s policies against slavery and human trafficking. For example, Ribbon has published employee reporting options—which include a hotline in various countries—in the employee Code of Conduct and on its intranet website. The Legal Department frequently reminds employees of the Company’s reporting options during employee online training sessions and all employee email alerts. Suppliers are encouraged to report questionable conduct related to any topic covered in the Supplier Code of Conduct—including slavery and human trafficking—to Ribbon’s Legal Department. Ribbon has not received any employee or supplier reports alleging slavery or human trafficking in Ribbon’s workplace or supply chain as of January 1, 2023.

Ribbon’s Audit Practices in Relation to Slavery and Human Trafficking

Ribbon screens prospective suppliers for criminal conduct—such as slavery and human trafficking—using a Refinitiv World-Check which is a robust risk intelligence data base. The Company will screen a current supplier using Refinitiv World-Check if it reasonably believes that the supplier is in violation of applicable law. Ribbon will reject a prospective or current supplier if it cannot meet Ribbon’s corporate social responsibility requirements and/or has been officially sanctioned for human trafficking or slavery violations; provided that, Ribbon will consider engaging with, or continuing to engage with, a supplier that has been convicted of slavery and human trafficking if the supplier can demonstrate to the satisfaction of Ribbon’s supply chain leadership that it has engaged in effective remediation efforts to address the concerns.

To the extent legally permissible, all Ribbon employees are subject to an extensive criminal background check during the hiring phase as a condition of employment with the Company. Current employees may be subject to a criminal background check during their employment relationship should circumstances so require. Ribbon uses third-party background check providers to run its employee background checks. Subject to applicable law, Ribbon will not confirm or continue employment of an individual who has been convicted for crimes related to slavery and human trafficking. Ribbon has Human Resources personnel and/or senior
managers onsite at the majority of its Ribbon locations with a relatively high employee population. The Company believes that the onsite physical presence of its Human Resources and senior personnel serves to combat slavery and human trafficking among employees and contractors who work in Ribbon facilities.

Ribbon’s supply chain team, directly or via third party auditors, conducts audits of prospective and current contract manufacturers through virtual audits and on-site visits. In addition, Ribbon conducts onsite and remote Quarterly Business Reviews with existing contract manufacturers to test their performance and quality and to confirm their adherence to the principles of the RBA. These QBRs include a presentation by the contract manufacturer’s human resources department to the Ribbon audit team regarding a variety of matters affecting the contract manufacturer’s workforce including workplace accidents, hours of work, and employee satisfaction.

This Statement is approved and supported by Ribbon’s Board of Directors.

Bruce McClelland
President, CEO & Director