



ribbonTM

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1.0 Objective

This document is written to communicate Ribbon Communications Corporate Policy, SC-CP-09 Supplier Code of Conduct.

2.0 Document Availability

To obtain the latest version of this or any other policy, visit the Ribbon Documentation tool @ <https://ribbon.logicgate.com>.

3.0 Review Period

The Policy Owner will ensure a review of this policy is conducted every two (2) years at a minimum, or when significant business policy changes occur, to ensure the information contained herein is current and applicable.

4.0 Policy

Our Commitment

We work in an energetic global industry where the pace is fast and change is constant. But, there are some things that don't change at Ribbon Communications (also, "Ribbon") - our commitment to doing business honestly, ethically, and with respect for others. It is to this end that Ribbon Communications has implemented this Supplier Code of Conduct ("Code") which mirrors many of the principles set forth in Ribbon Communication's Code of Conduct.

It has always been paramount to our way of doing business at Ribbon Communications to comply with applicable law and to act with the utmost integrity, honesty, and transparency. Ribbon Communications is committed to acting responsibly in all our business dealings to ensure that we comply with applicable national and international legislation, including laws regarding anti-corruption, anti-trust, anti-bribery and fair competition, and human rights. Ribbon Communications will forgo business opportunities rather than act in an unethical manner and/or in violation of applicable law. Preserving an ethical workplace is critical to our long-term success as a company.

At Ribbon Communications, the message for each Ribbon Communications' Supplier is clear: any success that is not achieved lawfully and ethically is no success at all. At Ribbon Communications, we obey applicable law and strive to hold ourselves to the highest ethical standards, and we expect the same of all our Suppliers.

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Human Rights and Labor

Ribbon's Suppliers are expected to support and respect the protection of human rights of employees and must treat all employees with dignity and respect. Ribbon Communications' Suppliers will:

Support Freely Chosen Employment: Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used either by Supplier or by any of its contractors, suppliers or subcontractors. This 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 on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in a language which they understand that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker. See Ribbon's Anti-Slavery and Human Trafficking Statement.

Comply with Young Workers Regulations: Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Supplier shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

Maintain Appropriate Working Hours: Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Provide Appropriate Wages and Benefits: Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For

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each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

Ensure Humane Treatment: There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers or threats for their family, nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Implement Non-Discrimination Policies and Processes: Supplier should be committed to a workforce free of harassment and unlawful discrimination. Supplier shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status, or any other characteristic protected by applicable law in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

Not Prevent Freedom of Association: In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

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Health and Safety

Ribbon's Suppliers must ensure safe working conditions and a healthy work environment for their workers. At a minimum, Supplier will ensure that the following health and safety standards are followed and adhered to:

Occupational Safety: Workers' potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified, assessed, mitigated and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must be taken to remove pregnant women and nursing mothers from working conditions with high hazards, to remove or reduce and workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers. Workers shall be encouraged to raise safety concerns.

Emergency Preparedness: Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

Occupational Injury and Illness: Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes and facilitate return of workers to work.

Industrial Hygiene: Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

Physically Demanding Work: Workers' exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

Machine Safeguarding: Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

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Sanitation, Food, and Housing: Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Workers' dormitories provided by the Supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

Health and Safety Communication: Supplier shall provide workers with appropriate workplace health and safety training in their primary language or a language they can understand for all identified workplace hazards that they are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Workers shall be encouraged to raise any health and safety concerns without fear of retaliation.

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Environment

Ribbon's Suppliers must demonstrate good stewardship of the environment by minimizing the adverse effects of their operations on the community, environment, and natural resources, while safeguarding the health and safety of the public. Suppliers are expected to meet the following requirements:

Environmental Permits and Reporting: All required environmental permits (e.g. discharge monitoring), approvals and registrations must be obtained, maintained and kept current and their operational and reporting requirements must be followed.

Pollution Prevention and Resource Reduction: Emissions and discharges of pollutants and generation of waste of all types, including water and energy, must be reduced or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, must be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

Hazardous Substances: Chemicals and other materials posing a hazard if released to the environment must be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Water Management and Solid Waste: Implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Supplier must implement a water management program that documents, characterizes and monitors water sources, use and discharge, seeks opportunities to conserve water, and controls channels of contamination. Wastewater generated from operations, industrial processes and sanitation facilities must be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures must be implemented to reduce generation of wastewater. Supplier must conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

Materials Restrictions: Supplier must comply with all applicable laws, regulations, and Ribbon requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations must be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems.

Materials Restrictions: Supplier must adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

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Storm Water Management: Supplier shall implement a systematic approach to prevent contamination of storm water runoff. Supplier shall prevent illegal discharges and spills from entering storm drains.

Energy Consumption and Greenhouse Gas Emissions: Supplier must establish a greenhouse gas reduction goal. Energy consumption and greenhouse gas emissions are to be tracked, documented, and publicly reported by Supplier against its greenhouse gas reduction goal. Supplier must look for and implement methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

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Business Conduct and Ethics

Ribbon Suppliers must commit to, and enforce, the highest standards of ethical conduct and fair business practices.

Business Integrity: The highest standards of integrity are to be upheld in all business interactions. Supplier shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Supplier's business books and records. Monitoring, record-keeping, and enforcement procedures must be implemented to ensure compliance with anti-corruption laws.

No Improper Advantage: Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Supplier commits to complying with all applicable laws relating to bribery and anti-corruption. Supplier agrees that it will not cause Ribbon or one of its customers to be in breach of any such laws and will maintain programs to prevent and detect violations of such laws. Supplier will report to Ribbon an allegation of bribery or corruption made in court, arbitration or in administrative proceedings against Ribbon or Supplier and will reasonably assist Ribbon in the investigation required by a government agency with regard to a breach of any such laws.

Disclosure of Information: Information regarding Supplier labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Intellectual Property: Intellectual property rights must be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer information is to be safeguarded.

Fair Business, Advertising and Competition: Standards of fair business, advertising and competition must be upheld by Supplier. Appropriate means to safeguard customer information must be available.

Protection of Identity and Non-Retaliation: Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers¹ must be maintained by Supplier, unless prohibited by law. Supplier must have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

Responsible Sourcing of Minerals: Supplier shall have a policy and exercise due diligence on the source and chain of custody of tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure they are sourced in a way consistent with the Organization for Economic Co-operation and Development Guidance for Responsible Supply Chains for Minerals from Conflict Affected and High Risk Areas, which aims to prevent the use of certain minerals that directly or indirectly finance or benefit

¹ Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

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armed groups in the Democratic Republic of the Congo or in adjoining countries. Supplier must make their due diligence measures available to customers upon customer request. See also [Ribbon's Conflict Minerals Policy](#).

Privacy: Supplier must protect the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Supplier must comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. See also [Ribbon's Privacy Policy](#).

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Monitoring and Compliance

Ribbon's Suppliers are expected to establish and maintain an appropriate management and monitoring system to ensure compliance with the law and this Code as set forth below.

Corrective Action: Suppliers are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with the law and/or this Code.

Compliance: Suppliers must keep all information necessary to document their compliance with the law and this Code. Ribbon requires all of its Suppliers to contractually commit to compliance with this Code and all applicable laws in the country or countries in which they are doing business for Ribbon. Further and upon prior written notice, Ribbon may, through itself or a third party, at Ribbon's cost, audit Supplier's books, records, practices and facilities to ensure Supplier's compliance with this Code and applicable law.

Reporting Noncompliance: Suppliers as well as their employees, contractors, suppliers, and subcontractors must report to Ribbon any known or suspected violations of applicable law, rules, regulations or this Code by Ribbon employees, contractors or suppliers, Supplier employees and/or their contractors or subcontractors. Reports can be made via email to Ribbon.Law@rbbn.com, via mail addressed to the Audit Committee of the Ribbon Communications' Board of Directors, c/o General Counsel, 6500 Chase Oaks Blvd, Suite 100, Plano, Texas 75023, or via telephone at +(978) 614-8170.

Management System: Suppliers are expected to establish a management system whose scope is related to the contents of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system should contain the following elements:

Supplier Commitment. Relevant public policy statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management, and posted in Supplier's facilities or on its intranet site in a language(s) that employees and contractors can understand.

Management Accountability and Responsibility. Clearly identify senior executive(s) and/or company representative(s) of Supplier responsible for ensuring compliance and implementation of management systems and associated programs. Senior management must review the status of the management systems on a regular basis.

Legal and Customer Requirements. A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

Risk Assessment and Risk Management. A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

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Improvement Objectives: Written improvement objectives, targets and implementation plans to improve Supplier’s social, environmental, and health and safety performance, including a periodic assessment of Supplier’s performance in achieving those objectives.

Training. Programs for training managers, workers and those who have a direct responsibility for supply chain management to implement Supplier’s policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements and customer requirements including, for example, this Code.

Communication: A process for communicating clear and correct information about Supplier’s policies, practices, expectations, flow down- contractual obligations (including under this Code pursuant to a contract with Ribbon), and performance to workers, suppliers, and subcontractors.

Reports and Anti-Retaliation: Accessible mechanisms and procedures to assess employees suppliers and subcontractors’ understanding of, compliance with, and to obtain reports regarding actual or suspected violations of, Supplier policies, applicable law, and this Code. All interested parties, including Supplier employees, must be able to make reports free from unlawful retaliation.

Audits and Assessments. Periodic self-evaluations to ensure conformity with legal and regulatory requirements, the contents of this Code, and customer contractual requirements related to social and environmental responsibility.

Accountability Standards and Procedures. Maintain internal accountability standards and procedures for employees, contractors and suppliers failing to meet the standards set forth in this Code.

Documentation and Records: Creation and maintenance of documents and records in accordance with applicable law and customer expectations including, for example, records demonstrating compliance with this Code.

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References

[Responsible Business Alliance Code of Conduct \(2021\)](#) Version 7.0

[Ribbon Privacy Policy](#)

[Ribbon Conflict Minerals Policy](#)

[Ribbon Code of Conduct](#)

[Ribbon Anti-Slavery and Human Trafficking Statement](#)

[Ribbon Sustainability Report](#)

The Ribbon Supplier Code of Conduct has been developed using the principles from the Responsible Business Alliance, the International Labor Organization and the United Nations Global Compact.

5.0 Implementation

This Policy shall be implemented through the application of Ribbon Quality Management System (QMS), to drive continual improvement.

◇ End of Document ◇