



Verizon Supplier Code of Conduct

The Verizon Supplier Code of Conduct (“Supplier Code”) contains principles to promote ethical conduct in the workplace, respect for human rights as set forth in Verizon’s Human Rights Statement, safe working conditions, the protection of sensitive information, and responsible, secure, and resilient supply chains. These principles are of the utmost importance to Verizon. As used in this Supplier Code, “Supplier” refers to any entity providing products, people or services to Verizon, including its subcontractors and agents, and where applicable, the personnel of Supplier and its subcontractors and agents. Suppliers doing business with Verizon are expected to uphold these important principles and communicate them, and the need to abide by them, to Suppliers’ personnel, subcontractors and agents working on Verizon business. “Verizon” refers to Verizon Communications Inc. and its controlled affiliates and business organizations.¹

All Suppliers must operate in full compliance with the laws, rules and regulations of the jurisdictions (whether U.S. or otherwise) in which they operate or where they provide services to Verizon. Where this Supplier Code sets higher standards than what is required by law, Verizon expects Suppliers to adhere to such higher standards. The Supplier Code supplements, but does not supersede, the contracts between Verizon and the Supplier.

SECTION A - ETHICS AND STANDARDS OF CONDUCT

Verizon’s reputation is based not only on the actions of its employees but also on the actions of its Suppliers, their employees, and subcontractors. Verizon expects its Suppliers to act with integrity and respect at all times. We seek Suppliers that uphold the highest standards of ethics and behavior in all of their actions.

1) Business Integrity

Verizon values conducting and winning business fairly. Verizon expects its Suppliers not to engage in any forms of illegal or inappropriate activity, including corruption, extortion, embezzlement or bribery, regardless of the country in which the Supplier provides services to Verizon. Similarly, Verizon expects its Suppliers to maintain policies, processes and procedures to ensure such behavior does not occur.

2) Gifts and Entertainment

Suppliers must not provide entertainment that could embarrass Verizon or harm its reputation. Suppliers must never provide gifts or entertainment intended to improperly influence any person’s business judgment or that might create the appearance of undue influence. It is never permissible to give currency as a gift.

When Suppliers team with Verizon in providing goods and services to government entities, or otherwise deal with governmental officials in connection with Verizon matters, gifts or

¹ This Supplier Code supersedes all prior versions, the most recent of which was published in June 2020.

entertainment of any value are not permitted without the express written authorization of Verizon.

3) Competition, Advertising and Marketing

Verizon expects Suppliers to uphold fair and honest business standards in advertising, sales and competition. If a Supplier, with Verizon's prior written approval, engages in any advertising, marketing or promotional activities that reference or implicate Verizon, its name, logo or services in any manner, such materials must be truthful and accurate, with clear and conspicuous disclosure of material terms and limitations of advertised offers.

4) Alcohol and Drugs

Workplace health and safety is a priority for Verizon. Substance abuse is not acceptable to Verizon.

Suppliers must not engage in any work for or on behalf of Verizon, or in any fashion represent Verizon, while under the influence of alcohol or other substances that may impair the ability to work safely. In addition, Suppliers may not possess illegal drugs or controlled substances or prescription drugs not prescribed for them by a medical professional while on Verizon premises or while conducting business with or for Verizon.

Marijuana is an illegal drug under federal law. Even if a Supplier provides work for or on behalf of Verizon in a jurisdiction that has legalized marijuana for medical or recreational purposes, Suppliers may not work under the influence of marijuana, or use or possess marijuana while on Verizon property, in a Verizon vehicle or while doing any work with or for Verizon.

5) Gambling

Maintaining a professional and productive workplace is an imperative for Verizon. Gambling in the workplace can contribute to an unprofessional workplace.

Suppliers must not engage in gambling (online or offline), including games of chance, on Verizon premises, when using Verizon's systems, or while conducting business with or for Verizon.

6) Verizon Property, Funds and Information; Records

Verizon requires the proper use of its property, proper use of its funds, and proper care of its and its customers' non-public information. Verizon will not tolerate falsification or improper alteration of records.

Suppliers must use all Verizon property, including, but not limited to, equipment, funds, documents, electronic and written information and communications systems, with care and adherence to acceptable standards and Verizon's rules and procedures. Suppliers must report any suspected or actual misuse, theft, vulnerability, improper exploitation, or sabotage of Verizon property. Records prepared for Verizon, including records of all time worked and expenses, must be accurate and complete.

7) International Business

In conducting international business, Suppliers are required to comply with all applicable U.S. laws, executive orders, and regulations including the U.S. Export Administration Act,

the Export Administration Regulations, the Foreign Corrupt Practices Act, the National Defense Authorization Acts, and international laws such as the U.K. Bribery Act and the French Sapin II Law. Verizon expects adherence to the OECD Guidelines for Multinational Enterprises.

8) Conflicts of Interest

Verizon requires that decisions made on its behalf be objective and fair, and avoid even an appearance of a conflict of interest.

Suppliers must avoid engaging in any activity that would create an actual or apparent conflict of interest regarding their provision of products or services to Verizon. A conflict of interest exists when any relationships or activities impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. In the event an actual or potential conflict of interest does arise, Supplier must immediately report it to Verizon.

9) Workplace Violence

Verizon is committed to maintaining a work environment that is free from violence and weapons, or threatening, hostile or abusive behavior.

Suppliers must maintain a work environment that is free from violence, or threatening, hostile, or abusive behavior. Supplier personnel must never engage in violent or threatening behavior toward anyone in the workplace, including to other Supplier personnel, Verizon personnel, customers, or business partners. Verizon maintains a weapons-free workplace that prohibits anyone from possessing or using any weapon or weapon component (e.g., ammunition) on Verizon property, in a Verizon vehicle or while conducting business on behalf of Verizon. Unless expressly permitted by law, this includes weapons stored in a locked personal vehicle or while on Verizon property.

10) Supply Chain Risk Management

Verizon expects that Suppliers (including their suppliers) manage supply chain risk. Supplier supply chain risk management, at a minimum, should ensure the secure design (including traceable provenance of components) of supplier products or services, physical security (e.g., at the Suppliers' facilities as well as when products are in transit), and personnel security (e.g., onboarding (including background checks), off boarding, insider threat, training).

11) Supply Chain Integrity

Verizon expects that Suppliers ensure the integrity and resilience of the products and services purchased by Verizon. Suppliers should ensure that the product or services purchased by Verizon perform in the manner expected. Suppliers should have and implement resiliency plans, including plans in the event of disruptions, such as but not limited to, a pandemic, weather event, geo-political instability, volcanic eruption, and earthquakes.

12) Supply Chain Responsibility

Verizon expects that Suppliers will work to establish responsible supply chains in all respects, from the materials in products delivered to Verizon to the treatment of people that deliver Supplier's goods and services. Suppliers should have appropriate policies, management systems, and staffing in place to meet the expectations set forth in this

Supplier Code of Conduct. Suppliers should also ensure that vendors providing them with services in their workplace, including the provision of workers, also apply these standards.

All Suppliers should communicate to their employees and to their suppliers the standards to which the Supplier is committed, as well as relevant laws, regulations and protections.

Suppliers must comply with Verizon's requirements with respect to "conflict minerals" – see Verizon's Conflict Minerals Statement at <https://www.verizon.com/about/sites/default/files/Verizon-Conflict-Mineral-Statement.pdf>. Further, Suppliers must use all reasonable efforts to avoid modern slavery and human trafficking in their supply chains.

SECTION B – NON-DISCRIMINATION

Verizon embraces diversity and equal opportunity as fundamental principles and key components of its corporate strategy. We expect that all Suppliers will do the same.

Suppliers must not engage in discrimination on any basis prohibited by applicable law, including, without limitation, race, color, religion, age, gender, pregnancy, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status or military status. Suppliers must not engage in such discrimination in any aspect of the employment relationship, including recruitment, promotion, and remuneration.

Suppliers must also maintain a workplace culture based on respect where all forms of unlawful harassment and abuse, including sexual harassment, is forbidden. Unlawful harassment includes conduct or language that creates a hostile or offensive work environment. It can be physical, verbal or visual, and sexual harassment may include inappropriate touching, unwelcome romantic advances, lewd gestures or the display of obscene material. Suppliers must have appropriate policies and procedures in support of these requirements and must communicate these policies and procedures to individuals working on behalf of Supplier, including conducting all legally-required sexual harassment training.

Verizon believes that building an inclusive supply chain makes an economic impact in the communities we serve while creating a competitive advantage. Our robust supplier diversity and inclusion program actively seeks to provide opportunities to certified minority, women, veteran, service disabled veteran, disability, and LGBT owned businesses. Suppliers are encouraged to support supplier diversity efforts by utilizing diverse businesses. As such, Suppliers may be asked to report diverse spend, including "Tier 2" spend, on a quarterly basis. For more information about supplier diversity, including our reporting programs, please visit: <http://www.verizon.com/supplier-diversity>.

SECTION C – LABOR

Verizon views it as a business imperative to uphold the human rights of workers by treating them with dignity and respect and we expect the same commitment from Suppliers. Accordingly, all participants in Verizon's supply chain are expected to adhere to the following labor standards:

1) No Child Labor

Suppliers must not use child labor. Consistent with the principles set forth in ILO Convention No. 138, the term “child” refers to any person under the age of 15, or under the applicable minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest.

2) Only Voluntary Labor

Suppliers will not use forced labor of any type, including bonded, indentured or prison labor.² Suppliers are prohibited from requiring workers to pay fees or lodge deposits for their employment, either directly or through third parties. Suppliers will not place any unreasonable restrictions on workers’ freedom of movement within, or in and out of, company provided facilities. Suppliers 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.

3) Freedom of Association and Collective Bargaining

Suppliers must comply with applicable laws and regulations governing the legal rights of their employees to join or not to join worker organizations, including trade unions, and the right to collectively bargain, if they choose to be represented.

4) Working Hours and Wages

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Employees should have the ability to earn fair and equal wages, as determined by applicable local law.

Suppliers are fully responsible for the quality, performance, behavior, supervision and protection of their personnel. Verizon retains the right in its absolute discretion to require the removal of any individual from a Verizon job site for any reason.

SECTION D – HEALTH AND SAFETY

Verizon is committed to maintaining a safe and healthy workplace. We expect the same commitment from Suppliers.

All Suppliers must review and follow the principles described in Verizon’s Environmental, Health and Safety Policy, which can be found here: <https://www.verizon.com/about/our-company/company-policies/environmental-health-safety>.

Further, Verizon expects its Suppliers to conform to all applicable health and safety laws, regulations, and to industry codes. Verizon works with a third party to review safety-performance metrics for Suppliers working in areas highly prone to environmental and safety risks. Suppliers must register with this third party if requested and have a program or mechanism to enforce and monitor compliance with health and safety requirements. These programs or mechanisms should include at least the following elements:

²Verizon supports efforts to help incarcerated individuals develop their skills. Suppliers may, with Verizon’s written permission, participate in programs that have as a principal goal providing a benefit to incarcerated individuals.

1) Occupational Safety

Suppliers must provide personnel with a safe place to work including appropriate safety equipment. They must ensure that personnel are trained and qualified to identify hazards and perform their work functions safely before initiating any work for Verizon. Suppliers must have or subscribe to a written health and safety program or management system.

2) Emergency Preparedness

Suppliers must have emergency plans and response procedures that include:

- (a) emergency preparedness, reporting and notification;
- (b) evacuation procedures, training and drills;
- (c) appropriate hazard detection and suppression equipment; and
- (d) adequate (i) posting of exits; and (ii) exits from job sites.

Suppliers must ensure that their personnel performing services in Verizon facilities are aware of and comply with Verizon emergency plans and response procedures for those facilities.

3) Occupational Injury and Illness

Suppliers must have procedures and systems to prevent, manage, track and report:

- (a) occupational injuries and illnesses;
- (b) exposure of workers to chemical, biological and physical agents; and
- (c) violations and fines from the Occupational Safety and Health Administration or other regulatory agencies.

Such procedures and systems must include provisions to:

- (a) permit the cessation of unsafe work;
- (b) encourage worker reporting;
- (c) classify and record injury and illness cases; and
- (d) investigate cases and implement corrective actions.

Fatalities, injuries, illnesses, property damage, vehicle incidents and near-misses occurring on Verizon property or while delivering services to Verizon must be reported to Verizon by accessing the Supplier Reporting Portal at <https://www.verizon.com/contractor-reporting>.

SECTION E – ENVIRONMENTAL

Verizon considers environmental responsibility integral to delivering world-class services and solutions that create shareholder and community value. Verizon requires Suppliers to demonstrate a commitment to responsible environmental stewardship, including:

1) Compliance with Environmental Laws

Suppliers must ensure that personnel are trained and qualified to perform their work functions in an environmentally responsible manner while performing services on Verizon's behalf. At a minimum, Suppliers must comply with all environmental laws and requirements, including those relating to:

- (a) managing and disposing of hazardous materials;
- (b) releasing contaminants in air, soil or water;
- (c) protecting natural resources, wildlife and wetlands; and
- (d) recycling.

2) Pollution Prevention and Resource Reduction

Suppliers must strive to reduce, eliminate or prevent waste of all types by conserving materials and modifying their production or maintenance or facility processes. Suppliers must also work to reduce the volume and toxicity of products throughout the life cycle.

3) Environmental Consideration in Business Decision-making

Suppliers must work with their own subcontractors and suppliers to assess and address environmental and sustainability issues within their supply chains.

4) Assessment and Improvement of Environmental Practices

Suppliers are expected to implement an environmental management system and focus on monitoring and continually improving their performance. Well-designed “key performance indicators” and meaningful short- and long-term improvement targets are essential.

5) Recordkeeping

Suppliers must track and report to Verizon’s Environmental, Health and Safety team all waste materials managed on behalf of Verizon.

SECTION F – VERIZON INFORMATION; ACCESS TO VERIZON SYSTEMS AND PREMISES; NON-EMPLOYEE VERIZON IDENTIFICATION

Verizon is committed to protecting the non-public, sensitive information of its customers, employees, partners and others. Verizon expects the same commitment by its Suppliers. At a minimum, that requires Suppliers and their subcontractors to adhere to the following requirements:

1) Verizon’s Information

Verizon’s confidential and proprietary information concerning matters such as our business activities, strategies, plans, structure, technology, customers (including, but not limited to, names, locations, contract services and products, and controlled unclassified information), financial situation and performance is critical to our success, and such information must be protected from unauthorized disclosure and must not be used except in accordance with applicable regulations and contractual requirements.

Suppliers must comply with all applicable privacy, data protection, and information security laws and associated regulatory requirements as well as with Verizon’s privacy, data protection, and information security policies – as they are updated by Verizon – whenever Verizon’s confidential and proprietary information, especially personal information, is collected, stored, processed, disclosed, transferred and/or shared. Suppliers must return or destroy Verizon’s information when the information is no longer necessary for the performance of Supplier’s obligations or at the conclusion of its relationship with Verizon.

2) Special Duties for CPNI and Personal Information

If Verizon provides a Supplier access to Customer Proprietary Network Information (“CPNI”) or personally identifiable information pertaining to Verizon customers and/or employees, Supplier may only disclose such information to its personnel with a need to know such information in the performance of their work for Verizon, and only if permitted to

do so by its contract with Verizon. Supplier must adopt effective technical, physical and administrative measures that achieve these results. For this purpose: (i) "CPNI" is as defined in 47 U.S.C. Section 222(h)(1); and (ii) "personally identifiable information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household, such as an individual's name, social security number, financial account numbers (e.g., credit or debit card number or bank account information), account passwords and passcodes, driver's license and/or government-issued identification number, mother's maiden name, date of birth, email address, and healthcare records.

Upon request, Suppliers and their personnel must complete CPNI and/or Privacy compliance training provided by Verizon. In the event of an unauthorized disclosure of CPNI or personally identifiable information, Supplier must provide immediate notice to its account manager at Verizon and by electronic mail sent to cirtext@one.verizon.com. We must receive this email notification within the timeframe to which Supplier has agreed to notify Verizon of any security incident under its contract. Upon request, Supplier must provide Verizon with a certification of compliance with its CPNI obligations under the law, its contract and this Supplier Code.

3) Verizon's Information Systems

Suppliers who access the information systems or applications of Verizon, or any Verizon customer, may do so only as expressly authorized in writing by Verizon and in accordance with contractual or other then-current requirements of Verizon. Verizon-issued access credentials such as passwords, user IDs or PINs must be protected at all times, and access to Verizon systems and information must be immediately removed for any Supplier personnel, including subcontractors, who have been terminated or reassigned.

To maintain a safe and professional work environment, Verizon monitors Supplier use of company property, consistent with applicable law. Monitoring applies to company facilities and vehicles. Such monitoring also applies to company-provided communications devices, our networks and computer systems (including corporate email, encrypted and unencrypted internet access, and any application, such as web-based email or Slack, accessed from company provided devices and systems).

4) Building Keys, Access Devices and Non-Employee Identification

Building keys, access devices, and non-employee identification cards may be issued to Supplier personnel who have a recurring business need to gain entry to Verizon premises without escort, and/or a need to identify themselves to third parties as performing work for Verizon. If Verizon issues a building key or access device, the key or access device must: (i) be safeguarded; (ii) be used only by the authorized recipient; (iii) not be transferred without the consent of Verizon; (iv) not be duplicated; and (v) be returned to Verizon immediately when the employment of its holder is terminated, when its holder no longer requires such building key or access device, or at the request of Verizon. If Verizon issues non-employee identification cards, Supplier personnel must wear such identification whenever they are at a Verizon or Verizon customer premises, and that identification must be returned to Verizon immediately: (i) when the employment of its holder is terminated; (ii) when its holder no longer requires such identification; or (iii) at the request of Verizon. Non-employee identification must be used strictly in accordance with all contractual requirements and limitations on its use.

SECTION G – COMPLIANCE MANAGEMENT

Suppliers must manifest their commitment to implementation of the principles of this Supplier Code with an appropriate compliance management process. The management process must be designed to ensure ongoing compliance with applicable laws, regulations, and customer requirements related to Supplier operations and products, as well as conformance with this Supplier Code. The management process should support the continual identification and mitigation of operational risks related to this Supplier Code, and must ensure prompt corrective action. Suppliers should create and maintain appropriate documentation and records to track and ensure compliance with this Supplier Code. As a key element of managing compliance, Suppliers must take steps to ensure their subcontractors and sub-suppliers' own compliance and safety.

SECTION H – REPORTING CONCERNS; ENGAGEMENT WITH VERIZON

Suppliers must promptly report concerns and potential or actual violations of this Supplier Code. Suppliers should contact Verizon Ethics at 844-894.8433 (within the U.S.), International Dialing instructions (outside the U.S.), through email at: ethics@verizon.com, or online at www.verizonethics.com. Suppliers must provide reasonable assistance to any investigation by Verizon of any potential violation of this Supplier Code. Suppliers must protect anyone who works for them, either as an employee or a contractor, from any form of retaliation for reporting suspected or actual violations.

We have designed the www.verizonethics.com portal and hotline to handle questions from any concerned party, including our Suppliers, their employees, and members of the public. We encourage anyone with a question or concern regarding this Supplier Code to contact us using the above methods. Your question or concern will be documented and submitted to Verizon where an assessment will occur to facilitate a prompt and effective response within Verizon and/or make an otherwise appropriate referral for handling and resolution.

Please see Section F for separate reporting requirements with respect to breaches regarding CPNI or personally identifiable information. If a safety or environmental incident occurs while a Supplier is working on a Verizon project or property, the Supplier must enter the incident in the Environmental, Health and Safety supplier portal at <https://www.verizon.com/contractor-reporting> and ensure that its subcontractors who work on Verizon projects do the same.

Verizon reserves the right to review or audit Supplier's compliance with this Supplier Code. Suppliers are to promptly respond to requests for information from Verizon, or a third party working on our behalf, regarding matters covered by this Supplier Code. These may include surveys, questionnaires, requests for supporting documentation and other measures intended to increase visibility into our supply chain.

Verizon will incorporate ongoing Supplier Code compliance into its business relationships and procurement decisions. Violations of this Supplier Code will require the prompt establishment of corrective action plans or training, may affect Supplier's standing with Verizon, may lead to disqualification from future opportunities with Verizon, and may even result in the termination of the Supplier's business relationship with Verizon.

Supplier commits, to the extent required by Verizon, that it will require all Supplier personnel assigned to a Verizon account to sign a benefits waiver in a form determined by Verizon. Supplier commits to collect such benefits waivers, retain them, and be prepared to produce copies of them upon request by Verizon.

April 2021