



Supplier **Code of Conduct**



VERIZON SUPPLIER CODE OF CONDUCT

The Verizon Supplier Code of Conduct (“Supplier Code”) sets forth principles that Verizon has adopted to promote ethical conduct in the workplace, safe working conditions in Verizon’s supply chain, treatment of workers with respect and dignity, and environmentally responsible manufacturing processes. As used in this Supplier Code, “Verizon” refers to Verizon Communications Inc. and its controlled affiliates and business organizations.

Verizon embraces diversity and legal compliance as fundamental principles and key components of its corporate strategy. It is our desire that all suppliers to Verizon, their agents and their permitted subcontractors similarly embrace diversity and equal opportunity to the fullest extent possible. All suppliers must operate in full compliance with the laws, rules and regulations of the jurisdictions in which they operate, and they must act ethically at all times.

The Supplier Code is comprised of six sections: Section A specifies general standards of conduct for Verizon’s supply chain. Sections B, C, and D outline standards for Labor, Health and Safety, and the Environment, respectively. Section E addresses access to Verizon premises and Verizon identification. Section F outlines the elements of an acceptable system to manage conformity to this Code.

In all aspects of the Verizon/supplier working relationship, Verizon’s suppliers and their agents and permitted subcontractors shall support Verizon’s core values by conducting business with integrity, by treating others with respect, by striving for performance excellence and by accepting accountability for their conduct. Verizon reserves the right to review or audit vendor compliance with this Code.

The Verizon Supplier Code of Conduct is not intended to create new or additional third party rights or obligations to third parties, including any rights of, or obligations to, employees of suppliers. It supplements, but does not supersede, any rights maintained by Verizon under any contract with any supplier.

SECTION A - ETHICS AND STANDARDS OF CONDUCT

Suppliers, their agents and permitted subcontractors are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethics and behavior, including:

1) Business Integrity

Any and all forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited and may result in termination of any or all supply agreements with Verizon and possible legal action. Records prepared for Verizon, including records of work time and expenses, shall be accurate, truthful and complete, and shall meet applicable standards and requirements.

2) Company Information

Confidential and proprietary information addressing matters such as Verizon’s business activities, strategies, plans, structure, technology, customers, financial situation and performance is critical to the company’s success, and cannot be disclosed or used, except in accordance with applicable regulations, contractual

* Verizon’s Supplier Code of Conduct supersedes the predecessor document, “Building Mutual Trust – Standards of Conduct for Verizon’s Business Providers.”

requirements and this Code. It is paramount that our business providers safeguard Verizon's information. Suppliers must:

- Understand any specific requirements for using Verizon's information and, when not sure, seek guidance from Verizon.
- Comply with applicable non-disclosure agreements and contractual confidentiality requirements regarding information belonging to or in the possession of Verizon.
- Never misuse or disclose confidential or proprietary information to unauthorized parties.
- Use caution when discussing non-public information in public or any place where others may overhear.
- Safeguard and appropriately handle information regarding the Verizon brand or logo.
- Secure Verizon's written approval before using information about Verizon or Verizon's name or brand identity publicly in any publicity, advertising or website.
- Not access, use, copy, manage, store or process company information outside the United States without the prior written approval of Verizon.

3) Competitor Disparagement and Obtaining Information

Verizon competes based on the strength of its products, services, reputation, and fair and accurate comparisons with its competitors. Suppliers should not make unfair, misleading, or inaccurate comparisons with the products and services of Verizon's competitors. Verizon acquires competitive and other information only using proper means and without misrepresentation, and Verizon's suppliers, their agents and permitted subcontractors shall similarly do so.

4) Advertising and Marketing

If a Verizon supplier is, with Verizon's prior written approval, engaged in any advertising, marketing or promotional activities that reference or implicate Verizon, its name, logo or services in any manner, such materials must comply with all laws, rules and regulations, and must be truthful and accurate. Materials must not be false, misleading or have a tendency to deceive, and all claims must be substantiated. All supplier's advertising must make clear and conspicuous disclosure of material terms and limitations of advertised offers.

5) Alcohol and Drugs

Suppliers must not report to work or engage in any work for or on behalf of Verizon, or in any fashion represent, or make any representations on behalf of Verizon, while under the influence of illegal drugs or alcohol. In addition, Suppliers may not possess illegal drugs or controlled substances while on Verizon premises or while conducting business with or for Verizon. This prohibition does not include legally obtained medications used as directed by a licensed medical practitioner that do not create a safety risk such as possible impairment in operating machinery.

6) Gambling

Gambling, including games of chance, is not allowed while working for or on behalf of Verizon or on Verizon premises.

7) Conflicts of Interest

Suppliers should avoid engaging in any business activity that would conflict or interfere with their provision of products and services to Verizon.

8) Company Property, Funds and Information

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, applicable laws, and Verizon's rules and procedures. Suppliers are required to report any suspected or actual misuse, theft, vulnerability, improper exploitation or sabotage of Verizon property.

9) Business Courtesies

Verizon's suppliers, like Verizon, are expected to compete based on the merit of their products and services, not through gifts, entertainment, or other business courtesies. Although business courtesies can promote successful working relationships and good will, Verizon expects its suppliers to follow all applicable laws and Verizon's rules and procedures with respect to gifts, entertainment, and other business courtesies when working with or representing Verizon.

10) Working with the U.S. Government

When interacting with U.S. federal, state and local government bodies and agencies, and their representatives, Verizon's suppliers must conduct themselves with honesty and integrity, and comply with all applicable laws and regulations, including, but not limited to, laws and regulations relating to government ethics, lobbying and the handling of confidential, classified and other government information. Suppliers whose work with Verizon relates to U.S. federal government contracts may be subject to additional requirements as specified in their contracts with Verizon.

11) International Business

Verizon conducts business around the world in compliance with applicable law and in consideration of both U.S. and local standards and customs, and in a manner that fosters Verizon's reputation as a good company with which to do business, such as: (a) only lawfully transferring Verizon products, services, equipment, information or knowledge across borders, (b) only making proper and permissible payments to parties outside the U.S., and (c) only exchanging business courtesies according to Verizon standards and local law. The foregoing includes, but is not limited to, compliance with the U.S. Export Administration Act, the Export Administration Regulations, and the Foreign Corrupt Practices Act. Suppliers to Verizon, when representing Verizon or performing Verizon work, must similarly comply with these requirements.

12) Customer and Employee Privacy and Personal Information

As a Verizon supplier, you have an important role in helping Verizon to sustain our customers' and employees' confidence in the company and its products and services. To meet these concerns, you must use care in working with all customer and employee information and communications, safeguard such information as required under your contracts with Verizon and this Code, and only access such information as authorized. If Verizon deems it necessary to provide a Supplier access to Customer Proprietary Network Information (CPNI) or Personal Information pertaining to Verizon customers and/or employees, the Supplier may only disclose such information to vendor personnel with a need to know such information in the performance of their work for Verizon, provided that such disclosure is also otherwise permitted by the Supplier's contract with Verizon. The Supplier shall adopt effective technical, physical and organizational measures that achieve this result. For this purpose: "Customer Proprietary Network Information" shall be as defined in 47 U.S.C. Section 222(f)(1); and "Personal Information" shall be information that, either alone or in combination with other data, identifies or uniquely relates to an individual, 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 pass codes, driver's license and/or government-issued identification number, mother's maiden name, and healthcare records. In the event of an unauthorized disclosure of such CPNI or Personal Information, the vendor shall provide notice of the same to Verizon by electronic mail to security.issues@verizon.com within forty-eight hours (unless otherwise required by law), and shall additionally provide notice in accordance with the vendor's contract with Verizon. Upon request, Supplier shall provide Verizon with a Certification of Compliance with its CPNI obligations under the law, its contract and this Code.

13) Reporting Concerns or Misconduct

Suppliers must report concerns and potential or actual misconduct that violate this Supplier Code of Conduct. Suppliers shall, consistent with any applicable law and privilege, provide reasonable assistance to any investigation by Verizon of a violation of the Supplier Code of Conduct. When reporting suspected or actual misconduct, suppliers should report concerns relating to **Verizon Business** to the Verizon Business Ethics Line at (877) 624-0007, or by E-mail at Ethicsline@verizonbusiness.com. If the issue pertains to **Verizon Wireless**, the supplier should call the Verizon Wireless Office of Integrity and Compliance Guideline at (800) 488-7900, or send an E-mail to Compliance@verizonwireless.com. If the concern of potential or actual

misconduct pertains to any other part of **Verizon Communications Inc.**, the supplier should contact the Verizon Office of Ethics and Business Conduct at (800) 856-1885 or (800) 968-4586 (TTY) or www.verizonguideline.com. If a supplier is unsure which business unit the misconduct pertains to, he or she should contact the Verizon Office of Ethics and Business Conduct, (800) 856-1885, to report ethical concerns. Suppliers located outside the United States may telephone +1 (202) 736-6111.

Suppliers and their agents must protect anyone who works for them, either as an employee or a consultant, from any form of retaliation for reporting suspected or actual misconduct.

SECTION B – LABOR

Suppliers of products or services produced in or provided from the United States shall comply with all applicable federal, state and/or local laws and regulations. Suppliers of products or services produced or provided from outside the United States shall comply with applicable laws and regulations of relevant countries. However, regardless of applicable laws and regulations, suppliers must uphold the human rights of workers by treating them with dignity and respect.

Suppliers retained by Verizon and their agents and permitted subcontractors, 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 personnel of a contractor or subcontractor from a Verizon job site in appropriate circumstances, for example: (a) if there is reasonable cause to believe a person is under the influence of alcohol, drugs, or other substances that adversely affect that person's work or create a safety risk, (b) for commission of an illegal act, (c) for threatening or harassing the public or a Verizon employee, or otherwise engaging in abusive or disruptive conduct, (d) for violation of a Verizon policy, or (e) for performing an unsafe act.

SECTION C – HEALTH and SAFETY

Suppliers to Verizon must conform to all applicable health, safety and environmental laws and regulations. Ongoing worker input and education is key to identifying and resolving health and safety issues in the workplace, and these are critical to the overall success of a safety and health program. Accordingly, suppliers retained by Verizon should address the following:

1) Occupational Safety

Every supplier shall be committed to the safety and health of its employees, and shall ensure that required training of personnel has been completed prior to initiating any work activity. The supplier should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations and by utilizing suitable means, e.g., design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.

2) Emergency Preparedness

Suppliers to Verizon shall have emergency plans and response procedures that implement all applicable laws and regulations regarding emergency preparedness, addressing emergency reporting, notification and evacuation procedures, training and drills, appropriate hazard detection and suppression equipment, and adequate exit facilities from job sites.

3) Occupational Injury and Illness

Suppliers to Verizon shall have procedures and systems to manage, track and report occupational injuries and illnesses, exposure of workers to chemical, biological and physical agents, and motor vehicle incidents. Such procedures and systems shall implement all applicable laws and regulations, and include provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; and c) investigate cases and implement corrective actions.

SECTION D – ENVIRONMENTAL

Adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

Suppliers must comply with all applicable health, safety and environmental laws and regulations when conducting business with Verizon. By way of example and not limitation, Verizon's suppliers must:

- 1) obtain and keep current all required environmental permits and registrations;
- 2) reduce, control and/or eliminate wastewater, waste and pollution at the source;
- 3) reduce, control and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols and combustion products;
- 4) conform to applicable labeling and warning requirements; and
- 5) identify, manage, store, move and handle hazardous substances in accordance with law.

SECTION E – ACCESS TO VERIZON PREMISES; NON-EMPLOYEE VERIZON IDENTIFICATION

Supplier personnel who, in the course of their Verizon work, access Verizon premises and/or utilize Verizon-issued non-employee identification in their dealings with third parties shall comply with the following:

1) Non-employee identification

Non-employee identification cards are issued to Supplier personnel who have a recurring business need to enter Verizon facilities without escort, or a need to identify themselves to third parties as performing work for Verizon. The Supplier personnel shall wear such identification whenever they are at a Verizon premises. Non-employee identification shall be returned to Verizon immediately: when the employment of its holder is terminated, when its holder no longer requires such identification for Verizon work, or at the request of Verizon. Non-employee identification shall be used strictly in accordance with all contractual requirements and limitations on its use.

2) Building keys and access devices

Building keys and access devices are used to gain entry to Verizon premises. If Verizon, in its discretion, issues a building key or access device:

- such key or device shall be safeguarded;
- it shall be used only by the authorized recipient;
- it shall not be transferred without the consent of Verizon;
- it shall not be duplicated; and
- it shall be returned to Verizon immediately: when the employment of its holder is terminated, when its holder no longer requires such identification for Verizon work, or at the request of Verizon

SECTION F - MANAGEMENT SYSTEM

Suppliers must manifest their commitment to implementation of the principles of this Supplier Code by having or establishing an appropriate management system to address compliance with these principles and detection and correction of any non-compliance. An appropriate management system should contain the following elements:

1) Management Accountability

Executive responsibility for ensuring implementation and periodic review of the status of the management systems.

2) Legal and Customer Requirements

Identification, monitoring and understanding of applicable laws, regulations and customer requirements, and procedures for reviewing compliance and correcting any deficiencies.

3) Communication

Process for communicating clear and accurate information about Supplier's performance, practices and expectations to workers, suppliers and customers.