VERIZON SUPPLIER CODE OF CONDUCT

The Verizon Supplier Code of Conduct (“Supplier Code”) contains principles to promote ethical conduct in the workplace, safe working conditions, the protection of sensitive information, the treatment of workers with respect and dignity, and responsible supply chains. 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. “Verizon” refers to Verizon Communications Inc. and its controlled affiliates and business organizations.*

At a minimum, 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 the law provides, Verizon expects Suppliers to adhere to such standards. It supplements, but does not supersede, the contracts between Verizon and the Supplier.

SECTION A - ETHICS AND STANDARDS OF CONDUCT

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

1) Business Integrity
All forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited.

2) Competition, Advertising and Marketing
Verizon expects Suppliers to uphold fair 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.

3) Alcohol and Drugs
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 while on Verizon premises or while conducting business with or for Verizon.

4) Gambling
Supplier must not engage in gambling, including games of chance, on Verizon premises or while conducting business with or for Verizon.

5) Verizon Property, Funds and Information; 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

* This Supplier Code supersedes the predecessor version, published in May 2013.
adherence to acceptable standards 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. Records prepared for Verizon, including records of work time and expenses, must be accurate and complete.

6) International Business
In conducting international business, Suppliers are expected to comply with all U.S. and local standards and customs, such as the U.S. Export Administration Act, the Export Administration Regulations, the Foreign Corrupt Practices Act and related international laws such as the U.K. Bribery Act and the French Sapin II Law.

7) Business Courtesies
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 entertainment of any value are not permitted without Verizon’s express authorization.

8) Conflicts 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 where Verizon personnel have a financial or close personal interest relating to the Supplier or its personnel, and such relationship could interfere with or influence the award, conduct or oversight of work for Verizon. In the event an actual or potential conflict of interest does arise, Supplier must immediately report it to Verizon.

SECTION B – 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. 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 involuntary prison labor. 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) Non Discrimination
Suppliers must not engage in discrimination on any basis prohibited by applicable/local 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. Verizon embraces diversity and equal opportunity as fundamental principles and key components of its corporate strategy. We strongly encourage that all Suppliers do the same. Suppliers must also maintain a workplace culture based on respect where all forms of unlawful harassment and abuse, including sexual harassment, is forbidden. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to employees and adequate training must be provided. We also encourage Suppliers to visit Verizon’s Supplier Diversity website at http://www22.verizon.com/about/community/supplier_diversity/.

5) 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 C – HEALTH AND SAFETY
Suppliers must conform to all applicable health and safety laws and regulations, and to applicable industry codes. Suppliers must have a program or mechanism(s) to enforce and monitor compliance with health and safety requirements. These programs or mechanisms should include at least the following elements:

1) Occupational Safety
Suppliers must be committed to providing personnel with a safe place to work and making appropriate safety equipment available. They must ensure that personnel are trained and qualified to perform their work functions safely prior to initiating any work for Verizon. Suppliers must have or subscribe to a written safety and health program.

2) Emergency Preparedness
Suppliers must have emergency plans and response procedures that include: (i) emergency preparedness, reporting and notification; (ii) evacuation procedures, training and drills; (iii) appropriate hazard detection and suppression equipment; and (iv) adequate exit facilities 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 manage, track and report: (i) occupational injuries and illnesses; (ii) exposure of workers to chemical, biological and physical agents; and
(iii) violations and fines from the Occupational Safety and Health Administration or corresponding local regulatory agencies. Such procedures and systems must include provisions to: (a) encourage worker reporting; (b) classify and record injury and illness cases; and (c) investigate cases and implement corrective actions. Fatalities, injuries, illnesses, property damage, vehicle incidents and near-misses occurring on Verizon controlled premises while delivering services must be reported as directed by Verizon.

SECTION D – ENVIRONMENTAL

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

1) Compliance with Environmental Laws
Suppliers must comply with all environmental laws and requirements, including those relating to: (i) the management and disposal of hazardous materials; (ii) contaminants in air, soil or water; (iii) the protection of natural resources, wildlife and wetlands; and (iv) recycling.

2) Pollution Prevention and Resource Reduction
Suppliers must strive to reduce or 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 are to work with their own sub-suppliers to assess and address environmental and sustainability issues within their supply chains.

4) Assessment and Improvement of Environmental Practices
Suppliers are to implement environmental management systems and focus on continuously monitoring and improving their performance. Well-designed “key performance indicators” and meaningful short- and long-term improvement targets are essential.

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

All Suppliers are expected 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, financial situation and performance is critical to our success, and such information must be protected from disclosure and must not be used except in accordance with applicable regulations and contractual requirements.

Suppliers must comply with applicable compliance with all 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 organizational 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, 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, date of birth and healthcare records.

Upon request, Suppliers and their personnel must complete CPNI 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 security.issues@verizon.com. We must receive this email notification within forty-eight (48) hours. 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 who have been terminated or reassigned.

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 F – 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 sub-suppliers’ own compliance. 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 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 G – REPORTING CONCERNS; ENGAGEMENT WITH VERIZON

Suppliers must promptly report concerns and potential or actual violations of this Supplier Code. Suppliers should contact the Office of Ethics and Business Conduct through the VZ Compliance Guideline at 844-VZGUIDE (844.894.8433) (within the U.S.), (+)800.0.624.0007 (outside the U.S.), through email at vzguide@verizon.com, or online at www.verizonguideline.com.† Suppliers must provide reasonable assistance to any investigation by Verizon of a 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 above portal and hotline to handle questions from any concerned party, including Suppliers 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 assure a prompt and effective response.

Please see Section E for separate reporting requirements with respect to breaches regarding CPNI or personally identifiable information.

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

† Verizon Media Group, formerly known as Oath, is a wholly owned subsidiary of Verizon that includes businesses purchased from AOL Inc. and Yahoo! Inc. Verizon Media Group Suppliers should report concerns and potential or actual violations of this Supplier Code to the Verizon Media Group Ethics & Compliance Office via one of the channels listed below:
Email: eco@oath.com;
Phone: 833.275.6284 (allows for anonymity where permitted);
Online: verizonmedia.ethicspoint.com (allows for anonymity where permitted, with multiple languages); or
disqualification from future opportunities with Verizon, and may even result in the termination of the Supplier’s business relationship with Verizon.

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