

GOVERNANCE POLICIES

GOV 052: Code of Business Conduct Expectations for Suppliers and Other Third-Party Business Partners Policy | Version 2

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Document Name: Code of Business Conduct Expectations for Suppliers and Other Third-Party Business Partners Policy

Rev	Date	Author	Description	Approved by	Date
1	Feb-28-2017	Compliance	Policy rebranded for Mavenir	Kathy Harris	Feb-28-2017
1.1	Jul-19-2020	Shani Golan	Review – no changes required.	Not required	Jul-19-2020
2	Jun-13-2023	Jane Olney	Review – minor clarifications made.	Mike Barnes	15-Jun-2023

Code of Business Conduct Expectations for Third-Parties

1. Scope

This policy applies to all external parties doing business with, or on behalf of, of Mavenir Private Holdings II Ltd. or any of its wholly-owned subsidiaries (“Mavenir” or the “Company”). This policy does not apply to customers.

2. Summary

This policy outlines the Company’s expectations for ethical behavior and legal compliance by its business partners, including suppliers, external agents, resellers, alliance partners and others. The expectations are in line with internationally recognized platforms for socially-responsible corporations, including the United Nations Global Compact Principles, the International Labor Organization, and the Global e-Sustainability Initiative.

This policy is also in line with the Mavenir Code of Conduct for our own employees. We are not asking our business partners to adhere to any expectations that we do not hold ourselves to, and we do not expect our business partners to engage in any conduct or behavior that we would not engage in ourselves.

3. Policy

It is the Company’s expectation that all business partners will understand and abide by the key principles outlined in this policy when conducting any business with, or on behalf of, the Company.

Labor

- All business partners must comply with all local and international laws relative to employment matters.
- No person is employed who is below the minimum legal age for employment.
- Persons under 18 years of age are not engaged in hazardous work.
- Workers are free to leave their employment at will and are not subject to conditions of servitude or personal control.
- Employers shall not impose unreasonable restrictions on workers’ freedoms to associate with one another or with responsible external workplace organizations.
- Working hours must comply with local laws and not be excessive on a regular basis.
- Reasonable pay shall be provided commensurate with the work performed.

Work Environment

All business partners must comply with all local and international laws relative to health, safety and environmental matters.

- Workers must have access to clean toilet facilities, drinkable water and sanitary facilities for food storage.
- When employees must travel overnight for work purposes, company-provided accommodations shall be clean, safe and meet the basic needs of employees.
- Health and safety information and training shall be provided to employees periodically.
- Controls shall be in place to minimize the release of harmful emissions to the environment.
- Appropriate measures shall be in place to improve the environmental performance of products and services.

Workplace Conduct

All business partners must comply with all local and international laws and ethical expectations relative to workplace conduct and behavior, non-discrimination and respect for individuals.

- Individuals shall not be subject to any form of discrimination relative to a person's state of being, (e.g., race, ethnicity, gender, age, religion, sexual orientation, gender identity).
- Disciplinary practices and procedures shall be fair and consistently applied.
- Employees shall be treated with respect and dignity. Violations or abuses of any basic human rights will not be tolerated.
- Physical or verbal abuse or other harassment and any threats or other forms of intimidation are prohibited.
- Sexual harassment of any kind will not be tolerated.
- Bribes, facilitating payments, benefits or favors of any kind, intended or perceived as intended to obtain, retain or influence business decisions are strictly prohibited.
- Ethically meeting obligations of signed contract with no fraudulent or otherwise intentionally misleading representation of contract performance.

The Company may periodically seek information about fulfilment of these expectations and expects its business partners to provide cooperation and information in response to reasonable requests relative to implementing these principles.

Business Partner Acknowledgement

In many business relationships, particularly agents, resellers, distributors and vendors, the Company will require a formal acknowledgment of this policy by the outside business partner. This can be done by incorporating this document in a contract, or by separately completing Appendix A.

References

- Mavenir Employee Code of Conduct
- Global e-Sustainability Initiative
- International Labor Standards
- United Nations Global Compact Principles

<https://mavenir.com>
www.gesi.org
www.ilo.org
www.unglobalcompact.org

APPENDIX A

Business Partner Acknowledgment Form

The business partner listed below:

- Acknowledges receipt and understanding of Mavenir’s policy: Code of Business Conduct Expectations for Suppliers and Other Third-Party Business Partners.
- Intends to abide by Mavenir policy titled “Code of Business Conduct Expectations for Third-Parties” when conducting business with or on behalf of Mavenir.
- Intends to comply with all local and applicable international laws relative to labor, environment, workplace conditions and human rights relative to doing business for or on behalf of Mavenir.
- Will not knowingly violate the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, or other applicable local or international laws dealing with corruption, bribery or illegal payments or benefits.
- Will contact Mavenir immediately upon learning of any potential violations of the above principles.

Signature of Business Partner

Date

Printed Name of Business Partner (individual name and name of organization)