

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

**February 2024**

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## Modern Slavery and Human Trafficking – Introduction

Mavenir has no tolerance for modern slavery or human trafficking. We work with our partners to help ensure that such practices, if any, are identified and eliminated from our supply chain. Our objectives include promoting fair working conditions and realizing positive impacts on individual human rights across our value chain.

Our strong commitment to corporate social responsibility and sustainability continues to grow, and we are fully engaged to protect our workforce and the future of our communities, helping to ensure the highest ethical standards throughout our organization and across our operations, products, services, business practices, and supply chain. This commitment is backed by a wide scope of global and local policies to help ensure trust, transparency and the utmost compliance in human and employment rights.

This statement addresses our 2024 fiscal year, February 1, 2024 through January 31, 2025. It includes a summary of Mavenir’s key activities and our forward-looking plans and actions. This statement is aligned with regulatory reporting requirements including those from the UK Modern Slavery Act and the Australian Modern Slavery Act.

We regularly evaluate and enhance our responsible business practices and policies, strengthening our commitments to stakeholders including our employees, customers, partners, suppliers, and investors.

### Global Policy Overview

Mavenir has clear policies to prevent slavery and human trafficking in our own organization. We also very seriously consider the danger of these activities in the supply chain. We do not tolerate modern slavery or human trafficking in our organization or in our supply chain and are committed to taking appropriate steps to ensure everyone’s rights and freedom are protected with utmost respect.

Our policies are continuously enhanced to ensure strict compliance with human and employment rights, and environmental health and safety.

The Mavenir company policy is to ensure that all operations and transactions are within the laws of the countries where we operate. We further seek to apply the highest international standards – in accordance with internationally recognized standards for socially responsible corporations, including the United Nations Global Compact Principles, the International Labor Organization, and the Global e-Sustainability Initiative – wherever possible, in the way we employ people and do business.

We also apply such standards to the management of outsourced services, temporary workers, and self-employed contractors.

## Code of Conduct

Mavenir requires strict compliance with our Code of Conduct, which identifies key behaviors and actions in ethics, modern slavery, and related areas. It provides a strong message to our employees, customers, business partners and vendors, equity holders and the general public. Most of all, it demonstrates our commitment. We are committed to maintaining high ethical standards when conducting our business. Our reputation and success depend on doing business with integrity and delivering on our promises to our equity holders, customers, and employees.

Expected workplace behaviors are designed to support our Values and are based on the core concepts of integrity, honesty, and ethical behavior.

**Honesty:** Provide truthful information and respectful dialogue.

**Ethical Behavior:** Live the core values of the Company and act in good faith.

**Lawful Conduct:** Comply with all applicable laws and regulations.

**Good Judgment:** Apply appropriate judgment in decision-making.

**Common Sense:** Use common sense in daily activities and interactions.

## Global Procurement Policy

Mavenir's Code of Business Conduct Expectations for Third Parties outlines the Company's expectations for ethical behavior and legal compliance by our business partners, including suppliers, external agents, resellers, alliance partners and others in our supply chain. 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 our Code of Conduct. We expect our business partners to adhere to the same standards which we follow.

## Additional Policies

Mavenir implements additional policies that are relevant to Modern Slavery. The following policies apply to Mavenir Staff and partners including Full Time Employees, Contingent Workers, Subcontractors, and Suppliers:

- Employee Code of Conduct
- Anti-Violence Policy
- Anti-Corruption Policy
- Equal Opportunities Policy
- Non-Discrimination and Anti-Harassment Policy
- Global Procurement Policy
- Supplier Health & Safety Policy
- Mavenir Supplier Security Agreement
- Global Recruitment Policy
- Governance Policies
- Trade Restrictions Compliance Policy

Mavenir's Procurement, Supply Management, Legal, Operations, Quality, Security, Human Resources and Executive Management teams also maintain processes to uphold internationally recognized standards in:

- Labor and Human Rights
- Ethics (Including Ethics Helplines and Case Management)
- Third-Party Due Diligence (screening of vendors, customers, third-party agents, channel partners, resellers, and distributors)
- Trade Compliance
- Sustainable Procurement
- Health and Safety (including Country-specific requirements)
- Supplier Diversity Management and Reporting
- CSR Reporting (Environmental, Health and Safety, Ethics, Sustainable Procurement, Labor & Human Rights)

The Code of Conduct and additional information are published on [www.mavenir.com](http://www.mavenir.com)

## Training and Awareness

In efforts to increase employee awareness of modern slavery and human trafficking, Mavenir staff globally (including Full Time Employees, Contingent Workers, and Subcontractors) are required to complete mandatory training. The training addresses supply chain, labor & human rights standards, ethics, health, safety, and security regulations. Failure to complete this training results in disciplinary action.

## Mandatory Corporate Compliance Training Programs (Managers & Employees):

- Global Workplace Harassment
- Anti-Corruption & Bribery
- Conflict of Interest
- Data Privacy
- Antitrust & Trade Compliance

All managerial and executive employees of Mavenir are made fully aware of the company's policies in these fields and required to comply with them. The requirements are mainstreamed into in-house training activities, and this is a mandatory subject to be covered during annual performance appraisal meetings for managers and executives.

## Compliance and Grievance Mechanisms

We encourage Mavenir staff, suppliers, and customers to report suspected breaches of our Code of Conduct. Notification can be to managers within Mavenir, or via an anonymous external confidential reporting service – an online and phone reporting hotline that is communicated to all employees, suppliers, and contractors.

Any Mavenir employee who violates policy, encouraged non-compliance, is found negligent, or fails to act when necessary, is subject to disciplinary action up to and including termination. Suppliers are held to the same standards, with non-compliance subject to termination of supply agreements.

## Risk Mitigation and Due Diligence

### Supplier Qualification & Audits

Mavenir's suppliers are held to equally high standards for Quality, Environmental, Corporate, and Social Responsibility, Health and Safety, and Ethics.

Mavenir ensures Third-Party Due Diligence using comprehensive screening of vendors, customers, third-party agents, channel partners, resellers and distributors using internal and third-party resources including NAVEX.

All suppliers are required to complete Mavenir's new supplier assessment and sign Mavenir's Code of Business Conduct Expectations for Third Parties Policy. The assessment topics include:

- Supplier Culture
- Supplier Environmental policies
- Supplier Organizational mission
- Supplier Organizational values
- Supplier Code of conduct policies
- Supplier Health and safety policies

A fundamental principal of Mavenir's supplier qualification is to ensure that no Mavenir supplier uses child labor. All our suppliers must also ensure that they do not rely on illegal immigrants or those trafficked by either gang leaders or work agencies who charge employees to operate in any part of their organizations, contractors, or subcontractors. Therefore, all suppliers are required, as part of their contractual relationship, to sign contracts that include undertakings as set out above.

## Identifying and Assessing Areas of Risk in the Global Supply Chain

Mavenir takes steps through timely and regular inspections and audits of supplier operations to ensure that both product and service quality is maintained and that the above undertakings are fully met. Where any requirement is found out of compliance, the supplier shall be given a reasonable but brief period (ex. approximately eight weeks) to rectify it. If not fully rectified then the supply contract will either be suspended, a contractually agreed penalty applied, or the contract will not be renewed at the date when the current contract comes to an end.

During the period from March 1, 2023, to February 29, 2024, Mavenir identified a total of 95 suppliers classified as critical and high-risk. These suppliers represented various crucial categories, such as Radios, Logistics, Software & Hardware, with expenditures exceeding \$250K, covering COTS, IT, Cloud Services, and those vital for Protecting IP, Network Elements, with expenditures exceeding \$250K in 2022. Among these 95 suppliers, Mavenir pinpointed two suppliers involved in the manufacturing of Radio and associated components for the Mavenir brand, which were deemed to carry a high risk of modern slavery. Mavenir conducted on-site audits of both these suppliers in February 2024, revealing no violations or improper activities related to Under-age Labour or Forced labor.

## External Reporting & Transparency Actions

Mavenir engages with several leading organizations to disclose and provide transparency of our corporate responsibility and sustainability practices. Mavenir is a signatory of the United Nations Global Compact and has disclosed to the CDP-Climate since 2018. Mavenir also participates in the Telecommunication Industry Association's (TIA) QuEST Sustainability Assessment program.

In 2023, Mavenir was awarded the prestigious EcoVadis Silver award for its commitment to corporate

social responsibility and sustainability by EcoVadis, the world's largest provider of business sustainability ratings.

## Continuous Improvement and Long-Term Ambitions

We are continuing our supplier audit and risk assessment program, with activities planned throughout the year, to better identify and mitigate the risks of modern slavery within Mavenir's global supply chain. This ongoing collaboration, and enforcement of high standards, with our suppliers, will help ensure our continuing awareness and prevention.

Mavenir is committed to advancing our global training and awareness programs, continuing use of third-party risk and compliance management leaders such as NAVEX and EcoVadis, and increasing transparency of human rights and labor conditions across our workforce and suppliers.

## Trust the Future – Our Commitment

Mavenir has zero tolerance for modern slavery and human trafficking. We commit to humane working conditions, protecting human rights, supporting fair working conditions in our communities, and ensuring the highest ethical standards throughout our organization and across our global supply chain.

This statement is published on the company's website – [mavenir.com](https://mavenir.com)



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