



Ribbon Communications

Our Approach to Anti-Corruption

Overview

Ribbon Communications (Nasdaq: RBBN) is a global provider of voice communications software, IP routing, and optical networking to mobile and wireline service providers, enterprises, critical infrastructure and defense sectors. We support our customers' Path to Autonomous Networks by leveraging the latest AIOps automation platforms and Agentic AI technologies, helping them deliver better customer experiences, reduce operational costs, and achieve sustainable growth. To learn more about Ribbon visit rbbn.com.

As reflected in our Code of Conduct and Supplier Code of Conduct, we believe that zero tolerance for corruption, bribery, and other illegal payments is the right approach for every business. Organizations that take a clear stand against corruption build trust with stakeholders, reduce risk, and help create a fair and transparent business environment that benefits everyone.

Our Approach

Ribbon expects and requires its directors, officers, employees, representatives, agents and suppliers to comply with the laws of the United States and other locally applicable laws, and to maintain the highest ethical standards of business conduct. We aim to ensure Ribbon complies with relevant regulations and we reference industry standard best practices from reputable sources, such as:

- Joint Alliance for CSR (JAC) Assessment Criteria
- Responsible Business Alliance (RBA) Code of Conduct
- OECD Good Practice Guidance on Internal Controls, Ethics and Compliance
- UK Bribery Act 2010
- US Foreign Corrupt Practices Act (FCPA)
- EU Anti-Corruption Frameworks

Failure to comply with Ribbon's anti-corruption policy may result in civil and criminal penalties for Ribbon and responsible individuals, disciplinary action against Ribbon employees, and enforcement by Ribbon of its legal rights against third parties that violate their contractual obligations to Ribbon regarding anti-corruption.

The principles of integrity, accountability, and fair dealing are the cornerstone of Ribbon's business and are

critical to its future success. Ribbon believes that it is imperative that its directors, officers, employees, representatives, agents and suppliers act at all times in an honest and ethical manner in connection with their service to Ribbon and in compliance with all applicable laws and regulations. All employees must uphold Ribbon's stand against corruption and bribery in letter and in spirit.

The key elements of our approach to anti-corruption include:

Prohibition of Bribery and/or Improper Payments: We strictly prohibit bribes, kickbacks, illegal payments, facilitation payments, and other improper or unlawful receipt or offer of items or services (e.g., cash, entertainment, meals, travel, training, company-branded items, and sponsorships, etc. (collectively, "Gifts")) in any context to any person (natural, corporate or governmental).

Ethical Culture, Communications and Mandatory Training: Ribbon recognizes that, in the dynamic world of business, no rule book or Code of Conduct can anticipate every possible circumstance or eventuality that may relate to corruption and bribery. Therefore, Ribbon promotes a culture of integrity, ethical conduct and zero tolerance for corruption and bribery. 100% of active Ribbon employees are required to complete mandatory, regular training on Ribbon's Code of Conduct and related key policies such as Ribbon's Anti-Corruption and Bribery policy and its Corporate Fraud, Misappropriation, Money Laundering, and Fiscal Irregularity Policy. A commitment to abide by Ribbon's anti-corruption policies is a condition to join Ribbon for 100% of our new hires. It is also a requirement of continued employment for 100% of current employees. Furthermore, Ribbon regularly issues reminders and frequent communications (emails, posts on employee communication platforms, and online and in-office posters) to all employees relating to their obligations to uphold the principles in the Code of Conduct including anti-corruption and anti-bribery. Employees in high-exposure positions (such as sales and procurement) receive additional anti-corruption and anti-bribery training. All customer-facing sales, procurement and marketing employees must report all Gifts they give or receive above a specified monetary threshold to the Ribbon Legal Department for approval to be reimbursed by the Company. Ribbon's commitment to ethical business conduct is reinforced by executive leadership through regular employee communications, town halls, awareness campaigns and other initiatives designed to promote an anti-corruption culture throughout Ribbon.

Conflicts of Interest: Ribbon employees are required to avoid actual, apparent, and potential conflicts of interest. Employees receive periodic conflict of interest training and are reminded annually of their obligations through the Code of Conduct review process. Employee agreements include duties of loyalty and employees are encouraged to disclose conflicts promptly through designated reporting channels. All disclosed conflicts are reviewed and managed in accordance with Company policy and applicable approval requirements.

Political Contributions: We strictly prohibit political contributions that are given for the purpose of obtaining an improper advantage. All contributions to political parties or politicians must be for a legitimate purpose and must comply with applicable laws and regulations and may only be given following explicit written approval from Ribbon's Chief Legal Officer or Chief Financial Officer. Ribbon supports and

encourages employees' rights to participate in civic affairs and the political process on an individual basis but does not permit the use of corporate resources for personal political activities unless prior written approval has been granted by Ribbon's Chief Legal Officer or Chief Financial Officer.

Charitable Contributions: All charitable contributions on behalf of Ribbon must be approved in advance by the Chief Legal Officer.

Proper Use of Company Assets: Ribbon's employees are trained to take steps to ensure that Ribbon's assets, including but not limited to, electronic communications systems, information resources, intellectual property, material, facilities and equipment, are used only for legitimate business purposes. Personal use of Company assets (e.g., PC, email) is permitted provided it is reasonable and does not adversely affect the interests of the Company.

Appropriate Gifts: Ribbon expects its officers, directors and employees to deal fairly with the Company's financial institutions, government officials, business partners, resellers, agents, suppliers, vendors and competitors. All business relationships should be based on lawful and ethical practices, and it is the obligation of every Ribbon officer, director, agent, and employee to conduct business in a manner that avoids ethical or legal impropriety or the appearance of such. In this context, giving and receiving of Gifts is carefully monitored and controlled by the Company's Code of Conduct and Supplier Code of Conduct, and related policies including Ribbon's Anti-Corruption and Bribery Policy, Corporate Fraud, Misappropriation, Money Laundering, and Fiscal Irregularity Policy, and Global Expense Reimbursement Policy. Ribbon also maintains procedures governing Gifts. In accordance with the company's Anti-Corruption and Bribery Policy Gifts must be reasonable, transparent, lawful, accurately recorded and must never be provided or accepted for the purpose of obtaining an improper business advantage or creating the appearance of impropriety. Customer-facing and vendor-facing employees are required to report Gifts meeting established Company thresholds through approved Company tracking systems for review by the Legal Department. Reviews are conducted by the Legal Department and reimbursement controls support compliance with Company requirements. Charitable donations made on behalf of Ribbon require advance approval in accordance with Company policy. Under these policies, Ribbon officers, directors, employees and agents are prohibited from, inter alia:

- Offering, promising and/or providing a financial or other advantage to another person, where the advantage is intended to induce a person to perform a relevant function or activity (or to omit such performance) improperly, or reward them for that improper performance or omission.
- Requesting or accepting a financial or other advantage, with the intention that a relevant function or activity should be performed or omitted from performance improperly.
- Offering, promising or providing a financial or other advantage to a public official with the intention of influencing the official to obtain or retain business or an advantage in the conduct of business.
- Making or authorizing facilitation or "grease" payments, which are typically small payments made to an official solely to speed up a non-discretionary function, i.e., a function that the official would normally carry out as part of their job.
- Making incomplete, false or inaccurate entries on Ribbon's books and records.

Relationships with Suppliers: Ribbon's suppliers are expected to conduct their business in an ethical manner without engaging in, or appearing to engage in, corruption or bribery. Ribbon's [Supplier Code of Conduct](#) is a binding commitment in Ribbon's procurement contracts, and suppliers are obliged to uphold its' provisions, including those relating to ethical conduct and anti-corruption and anti-bribery. Ribbon applies risk-based due diligence procedures to appropriate third parties, including suppliers, resellers, distributors and business development agents. Due diligence may include sanctions screening, adverse media reviews, compliance assessments, financial propriety reviews, contractual anti-corruption commitments, periodic monitoring, and re-screening activities. Certain categories of third parties may be subject to enhanced due diligence procedures based on their risk profile. See Ribbon's Approach to [Ethical Business Practices and Legal Compliance](#) for additional information.

Risk Assessment: Ribbon conducts an annual anti-corruption and fraud risk assessment across all business units and operations as part of its Enterprise Risk Management procedures. The assessment considers, among other factors, geographic, industry, customer, government-interaction, third-party, and operational risks relevant to Ribbon's business activities. Such assessments may be carried out by Ribbon's qualified internal auditors, Legal Department, or an appointed third party. The outcomes of these assessments are communicated to Ribbon's executive leadership annually, and appropriate actions are implemented promptly to address identified risks or control enhancements, where necessary. The Chief Legal Officer reports the results of the Company's risk assessments to the Board of Directors, as appropriate.

Whistle-Blower Channels and Protection: Ribbon fosters a "Speak Up" culture and requires its officers, directors and employees to report instances of suspected or actual violations of its Code of Conduct and Anti-corruption and Bribery policy. Directors, officers and employees are frequently reminded about the importance of promptly reporting suspected or known violations of applicable laws, rules, regulations or the Code of Conduct. Our internal Legal Guidance and Reporting Policy detail the many ways our officers, directors and employees can make reports.

As a condition of doing business with Ribbon, suppliers must abide by the Ribbon Supplier Code of Conduct which prohibits corruption and bribery and requires reporting of such conduct. All reports are promptly investigated and appropriate actions are undertaken. Substantiated instances of corruption are reported to Ribbon's Board of Directors.

Ribbon maintains confidential reporting channels available to employees and, where applicable, external stakeholders. Reports may be submitted through designated ethics and compliance channels. Ribbon tracks reports, investigations and remediation activities and prohibits retaliation against individuals who raise concerns in good faith.

Ribbon prohibits retaliation against any individual who reports ethical, legal or other misconduct in good faith. All questions and concerns will be kept confidential to the extent possible. If a situation requires that the identity of an individual reporting any such misconduct not be disclosed, the Company will protect the anonymity of such individual to the extent legally possible. Reports, investigations and remediation activities

are subject to periodic review as part of Ribbon's governance and audit processes.

Violations of Ribbon's Ethical Practices or Legal Compliance: Failure of officers, directors or employees to comply with Ribbon's Code of Conduct or any applicable law, regulation, policy or procedure may result in, among other actions, suspension of work duties, diminution of responsibilities or demotion, and termination of employment. Failure of suppliers to comply with the Supplier Code of Conduct or any applicable law, regulation, policy or procedure may result in, among other actions, termination of the commercial relationship with Ribbon and recovery of damages.

Allegations of code violations will be reviewed and investigated by the Company's Legal Department, or, in appropriate circumstances, by the Audit Committee (a committee of the Board of Directors). The Chief Legal Officer is responsible for Compliance reporting to the Board of Directors.

Monitoring and Continuous Improvement: Ribbon periodically reviews the effectiveness of its anti-corruption and anti-bribery program through management reviews, audits, training assessments, compliance monitoring activities, risk assessments and investigation outcomes. Lessons learned are incorporated into policy enhancements, employee communications and training initiatives to support continuous improvement.

Supporting Global Sustainable Development

Our Approach to Anti-Corruption is aligned with the principles and core elements of ISO 37001:2025 Anti-Bribery Management Systems, the OECD's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the United Nations Convention Against Corruption, the Responsible Business Alliance, and the UN Global Compact, of which Ribbon is a signatory.¹

It also directly supports the following [United Nations Sustainable Development Goals \(SDGs\)](#):

- **SDG 16** which calls for substantially reduced corruption and bribery in all their forms.



Target 16.5: Substantially reduce corruption and bribery in all their forms

Target 16.6: Develop effective, accountable and transparent institutions at all levels

- **SDG 8** which calls for the promotion of sustained, inclusive and sustainable economic growth, full

¹ UN Global Compact: Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

and productive employment and decent work for all. Corruption undermines this goal.

8 DECENT WORK AND ECONOMIC GROWTH



Target 8.3: Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services.

- **SDG 12** which aims to ensure sustainable consumption and production patterns

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



Target 12.6: Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle

Governance

The executive direction of our infrastructure and systems to protect against corruption and bribery is led by Ribbon's Chief Legal Officer. Embedding an anti-corruption culture at Ribbon is supported by organizational processes led by Ribbon's SVP for Human Resources. Both executives collaborate to ensure effective protection across the organization and report status and progress to our executive leadership. Other senior managers, including our SVP, Deputy General Counsel and our Internal Audit Manager, also play an important role in ensuring effective organizational controls related to anti-corruption.

See also: Ribbon's [Code of Conduct](#), [Ribbon's Supplier Code of Conduct](#), and Ribbon's [Approach to Ethical Business Practices and Legal Compliance](#).

Disclosure

We report transparently to our stakeholders on progress and performance related to anti-corruption in our [annual Sustainability Report](#).

Version 8: Aug 2026