



Ribbon Communications

Our Commitment to Ethical Business Practices and Legal Compliance

Overview

Ribbon Communications (Nasdaq: [RBBN](#)) delivers communications software, IP and optical networking solutions to service providers, enterprises and critical infrastructure sectors globally. We engage deeply with our customers, helping them modernize their networks for improved competitive positioning and business outcomes in today's smart, always-on and data-hungry world. Our innovative, end-to-end solutions portfolio delivers unparalleled scale, performance, and agility, including core to edge software-centric solutions, cloud-native offers, leading-edge security and analytics tools, along with IP and optical networking solutions for 5G and broadband internet. We maintain a keen focus on our commitments to Environmental, Social and Governance (ESG) matters, offering an annual Sustainability Report to our stakeholders. To learn more about Ribbon, please visit [rbbn.com](#)

At Ribbon, we believe that ethical business practices and legal compliance ("Compliance") is fundamental to business success. The message from Ribbon's leadership to every officer, director, employee, partner, supplier, and customer is straightforward: ***Any success that is not achieved lawfully and ethically is no success at all.*** At Ribbon, we obey applicable law and strive to hold ourselves to the highest ethical and legal standards, and we expect the same of all those we do business with.

Our Approach

Ribbon conducts its business in accordance with the highest ethical standards and in compliance with all applicable governmental laws, rules, and regulations in every country in which we operate. Ribbon's [Code of Conduct](#) is the "true north" of its ethics and compliance program and its coverage extends throughout the Company. Ribbon's Code of Conduct and related policies are regularly reviewed and updated as needed.

The principles of integrity, accountability and fair dealing set forth therein are the cornerstone of Ribbon's business and are critical to its future success. Ribbon believes that it is imperative that all Ribbon officers, directors, employees, suppliers and partners in every location where we do business around the world always act in an honest and ethical manner in compliance with all applicable laws and regulations in connection with their service to Ribbon.

Zero tolerance for unethical conduct and non-compliance: Ribbon does not tolerate breaches of applicable laws, including the spirit of the law, regulations, generally accepted practices and standards. All

breaches in Compliance are reported to Ribbon's executive leadership and the Board of Directors to the extent deemed appropriate by Ribbon's Chief Legal Officer. See "[Violations of Ribbon's Ethical Practices or Legal Compliance](#)" below.

Embedded compliance programs: Our global compliance programs are designed to ensure conformity with our strict ethical standards and applicable laws, rules and regulations throughout our organization and prevent compliance breaches, while striving to eliminate potential Compliance breaches occurring through lack of awareness. Ongoing compliance governance includes, but is not limited to:

- **Established Governance Framework**
A clearly defined compliance governance structure, including roles, responsibilities, policies, standards, and procedures. The Chief Legal Officer is responsible for Ribbon's global compliance program and reports to the Audit Committee of the Board of Directors on compliance matters.
- **Clearly defined compliance focus areas in the [Code of Conduct](#)**
Namely, compliance with applicable laws, rules, and regulations; conflicts of interest; bribery; workplace conduct, corporate opportunities; fair dealing/fair competition; protection of confidential information (Company and third-party information); insider trading; financial reporting and accuracy of Company records; public disclosures; political and government activity; protection and proper use of Company assets; and whistleblower reporting channels and protection.
- **Compliance Risk Management and Monitoring**
Annual compliance risk assessments and ongoing reviews by Ribbon's Legal department and internal auditors throughout Ribbon
- **Internal Controls and Auditing**
Continuous monitoring by internal and external auditors to ensure:
 - i) accuracy of financial records,
 - ii) effectiveness of internal controls, and
 - iii) regular evaluation of compliance procedures.
- **Training and Awareness**
Ongoing education, training, and communication initiatives to promote compliance awareness across the organization.
- **Whistleblower Channels and Protection**
Various channels for reporting compliance concerns including among others a Third-Party managed Hotline for employees. This is coupled with a strict non-retaliation policy.
- **Ethical Supply Chain Management**
Engagement of suppliers committed to ethical practices, supported by due diligence and continuous monitoring. Our Supplier Code of Conduct includes reporting instructions for any ethical concerns.
- **Board-Level Reporting**
Regular compliance updates to the Board of Directors, with immediate escalation of any material breaches.

Culture, Communications and Training: Ribbon aims to ensure a culture of compliance, ethical practices, and zero tolerance for corruption and bribery. All Ribbon employees are trained in Ribbon's [Code of Conduct](#) and related policies such as, but not limited to, Ribbon's Anti-Corruption and Bribery Policy, and

its Corporate Fraud, Misappropriation, Money Laundering, and Fiscal Irregularity Policy, which provide a strong basis for understanding the need for and practical approaches to ensuring Compliance across all areas of our business in all locations. Compliance training for all employees is mandatory and covers a variety of key topics such as anti-harassment, anti-discrimination, anti-corruption, conflicts of interest, fair competition, and whistleblowing. 100% of active Ribbon employees in all countries where we have operational sites are required to complete mandatory ethics training each year.¹ The Code of Conduct acknowledgment is signed by 100% of active employees every year. Specifically, all new employees must agree to comply with our [Code of Conduct](#) and other key employee policies as a condition of joining Ribbon, and all current employees must re-certify to the Code of Conduct and complete ethics and compliance training each year.

Relationships with Suppliers: Ribbon's suppliers are expected to conduct their business in an ethical and compliant manner. Ribbon's [Supplier Code of Conduct](#) is a binding commitment in Ribbon's procurement contracts and all suppliers are obliged to uphold its provisions, including those relating to Compliance. Ribbon's Legal and Finance departments conduct desk top due diligence on suppliers, including resellers and agents, incorporating periodical screenings, risk assessments, compliance health checks and financial propriety checks. In addition, Ribbon's supply chain team, directly or via third party auditors, conducts audits of prospective and current contract manufacturers through virtual audits and onsite visits to ensure compliance with, inter alia, applicable human rights standards and the principles of the Responsible Business Alliance ("RBA"). In addition, Ribbon conducts onsite and remote Quarterly Business Reviews ("QBRs") with existing contract manufacturers to evaluate their performance and quality and to confirm their adherence to the principles of the RBA. These QBRs include a presentation by the contract manufacturer's human resources department to the Ribbon audit team regarding a variety of matters affecting the contract manufacturer's workforce including workplace accidents, hours of work, and employee satisfaction. Onsite audits, onsite visits and onsite QBRs provide Ribbon supply chain personnel with a unique opportunity to detect and combat slavery and human trafficking in its supply chain. See [Ribbon's Slavery and Human Trafficking Statement 2025](#).

Formal Review Mechanism / Risk Assessment: Ribbon conducts anti-corruption and fraud risk review across all business units and operations as part of our annual Enterprise Risk Management procedures. Ribbon's anti-corruption risk assessment consists of 17 KPIs. Such assessments may be performed by Ribbon's Legal Department, qualified internal auditors, or by an appointed third party, and include aspects of social and environmental compliance as well as financial and business regulatory compliance. The outcomes of such assessments are communicated to Ribbon's executive leadership and appropriate actions implemented to address non-conformances, if any.

Global 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, Anti-corruption and Bribery policy, other company policies, laws, rules, and regulations. Directors, officers and employees are frequently reminded about the importance of promptly reporting suspected or

¹ As of November 1, 2025, Ribbon employs 3,146 employees in 32 countries.

known violations of applicable laws, rules, regulations or the Code of Conduct. Our global internal Legal Guidance and Reporting Policy details 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, inter alia, 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 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

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 disciplinary action such as, 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.

Supporting Global Sustainable Development

Our Approach to Ethical Practices and Compliance directly supports the [Responsible Business Alliance](#) and the following UN SDGs:



Target 16.3: *Promote the rule of law and ensure equal access to justice*

Governance

Executive direction of our compliance infrastructure is led by Ribbon's Chief Legal Officer. Other senior managers also play an important role in ensuring effective organizational controls related to compliance.

The Audit Committee of Ribbon's Board of Directors oversees Ribbon's standards of compliance and adherence to Ribbon's compliance program, and reviews regular management reports and ad hoc reports on compliance.

Ribbon is a signatory to the UN Global Compact.

Ribbon's 5 primary sites are covered by Ribbon's ISO/IEC 27001 certification. Ribbon must recertify the ISO/IEC 27001 certification each year. Ribbon has been ISO/IEC 27001 certified since 2018.

See also: Ribbon's [Code of Conduct](#), [Ribbon's Supplier Code of Conduct](#), [Ribbon's Environmental, Waste Management](#), [Data Security](#), [Supply Chain Management](#), [Information Security](#), and other governance Positions, along with [Ribbon's Anti- Slavery and Human Trafficking Statement](#).

Reporting to Stakeholders

We report transparently to our stakeholders each year on progress and performance related to anti-corruption in our [annual Sustainability Report](#), available on our website. Ribbon's annual Sustainability Report complies with the SASB standard. Each Sustainability report covers the previous calendar year.

Global Coverage of Ribbon's Ethics and Compliance Program

Ribbon's employee ethics and compliance program applies to 100% of its employees regardless of their location, role or department. Ribbon's supplier ethics and compliance program applies to every supplier seeking to do business of any kind with Ribbon.

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