



Supplier Code of Conduct Policy

Overview

To demonstrate its commitment to be a 'Corporate Social Responsible' company ADTRAN has implemented internally and strives to ensure that its partners and suppliers maintain a safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever materials, products or services are provided to or performed on the behalf of ADTRAN.

ADTRAN requires its partners and suppliers to comply with the principles of ADTRAN's Supplier Code of Conduct (SCC) and in full compliance with all applicable laws and regulations. The ADTRAN Supplier Code of Conduct is not limited to the compliance with local, federal, and national law. ADTRAN has incorporated internationally recognized standards to advance social and environmental responsibility. This SCC outlines ADTRAN's expectations for partner and Supplier conduct regarding labor and human rights, health and safety, environmental protection, ethics, and management practices.

ADTRAN's Requirements for Our Partners and Suppliers

ADTRAN expects its partners and suppliers to follow this SCC, industry standard best practices for Corporate Social Responsibilities. In support of that, partners and suppliers are required to ensure compliance in the following areas:

Labor and Human Rights

In the absence of local, federal, and national laws, ADTRAN has established a Human Rights Statement that applies to its employees as well as to its partners and suppliers.

Child Labor

Partners and Suppliers must comply with all applicable child labor laws. Workers under the age of 18 may not perform work likely to jeopardize their health, safety, or education.

Antidiscrimination

Partners and Supplier must not discriminate against its employees based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices such as pregnancy or medical leave.

Anti-Harassment

Partners and Supplier shall maintain a work environment that fosters harmonious, productive working relationships and encourages mutual employee respect. ADTRAN prohibits and will not tolerate verbal or physical conduct by any Partner or Supplier that harasses, disrupts, or interferes with work performance or which creates an intimidating, offensive or hostile environment.

Working Hours

ADTRAN defines a work week as Monday through Sunday. Work hours may depend on the individual's job classification and shift. (e.g., 8, 10, or 12 hours per day) with a total of 36 to 40 regular hours and a maximum of 20 overtime hours. The Partner and Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

General Pay Practices

Supplier shall ensure that all workers receive at least the legally mandated minimum wages and benefits. Supplier shall offer vacation time, leave periods, and time off for legally recognized holidays.

Supplier shall compensate workers for overtime hours at the legal premium rate. Supplier shall communicate pay structure and pay periods to all workers. Supplier shall pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure.

Ethics

ADTRAN is known not only for the quality products and services it provides but for the way it does business. Adhering to the highest standards of business conduct in our relationships with one another, our partners, suppliers, customers and investors has set ADTRAN apart from other businesses and remains at the foundation of the company today.

Anti-Corruption

Partners and Suppliers must comply with all applicable U.S. laws that deal with foreign business transactions and/or applicable laws and regulations of the countries where business is conducted. Refer to the Global Anti-Corruption Policy, which is available at www.adtran.com, for ADTRAN's guidelines and its commitment to compliance with anti-corruption laws.

Confidential Information

ADTRAN has established a 3rd Party Security Policy along with non-disclosure-agreements and contacts for ensuring the proper management of confidential information. These agreements are critical to the success of both ADTRAN and its partners and suppliers. Partners and Suppliers must protect all ADTRAN information, electronic data, and intellectual property or ADTRAN technologies with appropriate safeguards.

Environmental and Sustainability Management System(s)

ADTRAN has established requires its suppliers to have an environmental program that is register and/or compliance to an international standard. The environmental program must include:

- A public environmental policy. The policy must be based on an analysis of the supplier's operations and environmental performance and be used as a basis for improvement
- The identification and documenting of significant environmental aspects in the supplier's operational activities
- An environmental improvement program, with objectives and action plans and
- A process/methodology for ensuring the supplier is aware of, and comply with, applicable environmental legislation and permits, and
- A program for ensuring that the supplier's employees have adequate and documented environmental competence

Monitoring and Reporting Compliance

ADTRAN encourages its suppliers, the supplier's, employees, customers, and other partners that are involved with ADTRAN to report actual or potential violations of this Code of Conduct Policy. If you are aware of conduct that you reasonably believe may violate this Policy, you are responsible for reporting it. Reporting a potential violation demonstrates your sense of commitment, responsibility, and fairness to ADTRAN's customers, shareholders, business associates, and your fellow employees.

Any concerns regarding potential or actual violations of the Policy should be reported to Red Flag Reporting through the following means:

- Online: <https://www.redflagreporting.com> (client code: ADTRAN)
- Phone: 1.888.723.8726 (available 24 hours a day, 7 days a week)

Reporting potential Policy violations helps to safeguard the reputation and assets of the Company. Your report will be investigated confidentially, and you will be protected from retaliation. If you have any questions regarding this Policy, you may contact compliance@adtran.com at any time.