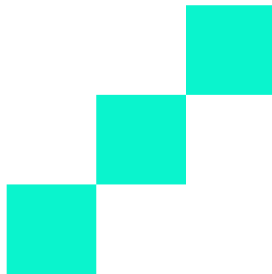
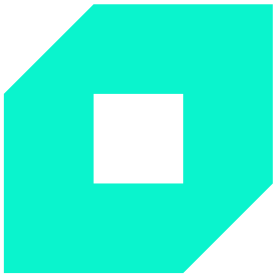




Supplier Code of Conduct



1. INTRODUCTION

We believe in conducting business in a safe, responsible, and sustainable manner. In selecting its suppliers, Syniverse strives to choose reputable business partners who conduct their business in a manner consistent with our commitment to high ethical standards, safe and healthy working environments, the safeguarding of human rights and dignity, the protection of the environment, and compliance with applicable regulations and laws.

This Supplier Code of Conduct ("Code") outlines our expectations regarding workplace standards and business practices of our direct and indirect suppliers in all categories. The standards outlined in this Code are essential factors to our decision regarding new or existing business relationships. Each supplier is responsible for ensuring its employees, representatives and subcontractors understand and comply with this Code.

2. SUPPLIER CONFORMANCE WITH LAW AND CONTRACTUAL OBLIGATIONS

Suppliers shall comply with all local, municipal, state, federal and governmental laws, orders, codes, and regulations in countries where the Suppliers are located or where services are performed for Syniverse. Suppliers shall also comply with all obligations in any contract Suppliers may have with Syniverse.

3. LABOR AND HUMAN RIGHTS

Syniverse is committed to fostering a workplace that treats employees with dignity and respect. This applies to all workers, including temporary, migrant, student, contract, direct employee, and any other type of worker. Suppliers must manage their own workforce to focus on the following requirements:

1. **Care About Your Employees.** Suppliers shall not engage in forced labor, human trafficking or slavery. Suppliers shall not participate in the recruitment, transportation, transfer, harboring or receipt of any persons by means of threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. All work must be voluntary, and all workers must be free to terminate their employment at any time.
2. **Protect Children.** Suppliers will not use child labor. "Child" means any person under age 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.
3. **Wages.** Suppliers will pay legally-mandated wages and benefits, will comply with the law regarding wage deductions, and will provide workers with the basis on which workers are paid via pay stub or similar documentation. Suppliers are expected not to deduct from wages as a disciplinary measure.
4. **Fair Treatment and Non-Discrimination.** Suppliers will comply with all applicable laws and regulations protecting their employees from unlawful discrimination and harassment.
5. **Diversity, Equity and Inclusion.** Syniverse continually strives to be a diverse, collaborative, and inspiring community that continually works to celebrate differences and encourage growth towards a stronger business and a more connected world. Suppliers will make tangible efforts to achieve the following goals:
 1. Establish a commitment to identify, measure and improve a culture of diversity and inclusion through all aspects of the workplace;
 2. Retain small and socioeconomically diverse suppliers where possible;
 3. Eliminate systemic bias through all aspects of the workplace.

4. HEALTH AND SAFETY

Suppliers shall provide safe and healthy working environments to prevent accidents and injuries to their workers. Suppliers will comply with all applicable safety and health laws and regulations, and identify, evaluate, and control worker exposure to safety and health hazards, including chemical, biological, physical, and ergonomic stressors, through proper design, engineering controls, maintenance, safe work procedures, and ongoing health and safety guidance. Safe and healthy working conditions include offering emergency training and resources, practicing industrial hygiene, and enacting equipment safety initiatives, as appropriate.

5. PROTECTION OF THE ENVIRONMENT

Syniverse is committed to managing its business in an environmentally responsible manner. Syniverse strives to make continual efforts to prevent negative effects upon the environment and ensure the health, safety, and welfare of its employees. Syniverse encourages its Suppliers to do the same. As such, Suppliers are encouraged to commit to (1) minimizing their impact on the environment (including but not limited to air emissions, water discharge, toxic substances and hazardous waste disposal), (2) maximizing their use of renewable energy, (3) setting net zero targets where applicable, and (4) implementing cradle to cradle manufacturing and/or responsible end-of-life disposal. Suppliers must fully comply with or exceed all applicable environmental regulations or standards.

6. SECURITY, ETHICS, AND COMPLIANCE

- 1. Know Your Employees.** To the extent permitted by law, Suppliers must conduct pre-placement employment checks consistent with this Code and must ensure any legal/criminal convictions, material delinquencies or substantial debt, or any other matters disclosed in the background check which may render the individual unsuitable for placement at Syniverse have been reviewed and addressed. Suppliers also attest that any individual assigned to access Syniverse facilities and/or resources such as email and/or network access shall conform with this Code.
- 2. Subcontractor Compliance.** Suppliers shall remain responsible for any subcontractors retained to perform services purchased by Syniverse and shall ensure their subcontractors comply with the requirements set forth in this Code.
- 3. Compliance with Anti-Corruption Law.** Suppliers shall not engage in any form of corrupt practices, including but not limited to the following: extortion, fraud, impersonation, false declarations, bribery, money laundering, or support of or involvement with terrorist or organized crime organizations and/or activities. Suppliers shall not offer bribes, kickbacks, illegal political contributions or other improper payments to Syniverse representatives, government officials or third parties with the intention of obtaining or retaining a business contract or providing an improper advantage.

7. CONTINUOUS COMMITMENT

Suppliers should use due diligence, audits and other means to monitor their own operations and maintain accurate accounting and business records that comply with all relevant legal and regulatory requirements. Suppliers will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with prevailing industry practices. Upon reasonable notice, Suppliers will cooperate in good faith with any information requests Syniverse may initiate to confirm their compliance with this Code.

8. REPORTING VIOLATIONS OF THIS CODE

Just as Syniverse strives to act with integrity and honesty in all matters of business, Syniverse expects its Suppliers to do the same. In order to foster an environment of high standard of ethical and professional conduct, Syniverse has an ethics reporting hotline. Employees, customers and Suppliers can address any issues on a confidential and anonymous basis. To report any known or suspected violations of the Code, laws, or regulations to Syniverse's Ethics Hotline, please call (800) 461-9330 (toll-free for U.S. and Canada), for international calls outside the U.S. and Canada, select your location dialing number by contacting <https://tinyurl.com/Syniverse-Hotline>. Any questions regarding the scope or compliance with this Code should be directed to Purchasing@Syniverse.com.

9. SUPPLIER'S CERTIFICATION OF COMPLIANCE

By accepting any Syniverse purchase order, Suppliers acknowledge acceptance of this Supplier Code of Conduct and confirm their intention to comply with its requirements. If you have additional questions about these requirements, please contact Purchasing@Syniverse.com.

Last Updated: December 2021