



The ADT Guide to Supplier Social Responsibility

Dear Supplier,

As ADT continues building a world-class supply chain organization, we believe our success lies in the quality of our supplier relationships. The *Guide to Supplier Social Responsibility* below sets forth our expectation that our suppliers share the following standards, and promote the application of these standards among those with whom they do business.

Environment, Health and Safety

As an industry leader, we are committed to conducting our business operations in a manner that sustains the environment, protects the health and safety of our employees and complies with applicable law. Our environmental sustainability efforts include an aggressive program to promote “green” enterprises, and recognize and encourage efforts that reduce greenhouse gasses and the environmental impact of our business. As such, all suppliers are expected to have an effective safety, health, and environmental program.

Diversity

We recognize that supplier diversity is a critical component of our business strategy. As a customer-centric organization, we are focused on fully understanding and exceeding our customers’ needs, wants, and preferences. Building a diverse organization and supply base to better reflect and meet the needs of the demographics and virtues of our stakeholders and customers helps us to better connect and protect what matters most to our customers.

Human Rights

ADT expects its employees and suppliers to treat one another with respect and dignity. Equal opportunity and fair treatment should be extended to all. ADT specifically will not tolerate discrimination on the basis of age, color, disability, ethnicity, marital or family status, national origin, race, religion, sex, sexual orientation, veteran status, or any other characteristic protected by law. Our values show our commitment to being a good global citizen and acting in a socially responsible way in the communities where we live and work across the globe.

We require ADT businesses and suppliers to provide clean and safe working environments and conditions, forbid child labor trafficking or slavery, and require that employees receive all compensation and benefits mandated by applicable laws. Regardless of the location, ADT will have no tolerance for business units or suppliers that engage in activities that do not respect an individual’s dignity, even if permissible under applicable law.

Conflicts Minerals

In response to concerns that profits from mining certain minerals, including tin, tantalum, tungsten, and gold, may be fueling human rights abuses in the Eastern Region of the Democratic Republic of the Congo (DRC) and adjoining countries, the United States Securities and Exchange Commission (SEC) now requires certain public companies to disclose the use of conflict minerals in their products. As a U.S. public company, we expect our suppliers to perform the required due diligence and analysis regarding the use of any conflict minerals in their products and provide us with the information necessary for us to comply with the SEC’s rules. We are committed to working closely with our suppliers, other industry trade groups, and government regulators to seek a sustainable solution regarding conflict minerals and verify that our suppliers and sub-suppliers comply with all applicable national and international laws.

Conflicts of Interest, Gifts and Entertainment

ADT expects its employees and suppliers to identify and prevent situations where there is an actual conflict of interest, or even the appearance of a conflict of interest. Our suppliers should familiarize themselves with ADT's policies and procedures on conflicts of interest, gifts, and business entertainment. These policies, which are outlined in our [Code of Conduct](#), govern gift giving, entertainment, loans, and other similar favors.

Financial Responsibility

ADT believes that accurate, timely financial records and controls are essential to fulfilling obligations to our shareholders, investors, governments, and the general public at large. As a financially responsible organization, we are committed to ensuring that all internal and external financial records and information follow U.S. generally accepted accounting principles, and are maintained through effective internal controls, including procedures to protect the company's assets. It is our expectation that our suppliers will exercise a similar commitment to financial responsibility.

ADT endeavors to comply with all applicable laws and regulations governing importation and/or exportation of products and technology. This includes, but is not limited to, production materials, finished goods, capital equipment, molds and tooling, samples and prototypes, repaired or returned products, and technical information. As a supplier partner, you are required to exercise due diligence to ensure that proper import/export-related policies, procedures, and controls are adopted within your organization. Failure to do so could expose ADT, along with our customers and suppliers, to significant financial exposure, increased scrutiny from government agencies, and negative publicity. Our ability to conduct business on a global basis is a privilege that cannot be jeopardized.

Prohibition on Gifts to Government Officials

To comply with U.S. laws prohibiting the bribery of government and foreign officials, as well as the laws of all nations where it does business, ADT strictly prohibits payment of cash and severely limits the provision of gifts to government and foreign officials. No payment in cash or in-kind may be made to government and foreign officials on ADT's behalf without approval by the ADT Law department. ADT expects its suppliers to be in strict compliance with the U.S. Foreign Corrupt Practices Act, as well as all local laws governing payments to government and foreign officials.

Supplier Responsibility

As a supplier, your role begins but does not end with understanding ADT's standards. If any ethical or legal compliance issues arise that raise questions in your mind, you have a responsibility to bring them forward. As a supplier, you agree to be audited by ADT and certify, now and upon request, that you have adopted equivalent standards as those embodied in this *Guide*.

Contact Information

To raise a compliance concern, you can contact ADT's confidential concern line by phone at (877) 871-5625 or by email at adtethicsline@adt.com. The ADT Ethics Line is available seven days a week, 24 hours a day and is staffed by trained professionals.

Alternatively and during regular business hours, you may contact the ADT Ethics Office established to address the compliance concerns of our employees, suppliers, investors, and customers by phone at (561) 226-2900 or by email at adtethicsoffice@adt.com.