The ADT Supplier Social Responsibility Guide

As a responsible corporate citizen, ADT is committed to promoting responsible management practices and reducing our impact on the environment. We expect our suppliers to share our commitment and comply with this Supplier Social Responsibility Guide.

Governance:

1. 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.

2. Import/Export: ADT endeavors to comply with all applicable laws and regulations governing importation and/or exportation of products and technology (including compliance with proscriptions against dealing with entities and countries blacklisted by the US Government such as Cuba, Iran, North Korea, Sudan, and Syria). 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 and adopt and implement proper import/export-related policies, procedures, and controls within your organization to ensure compliance with applicable laws and regulations. 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.

3. Business ethics: Suppliers must conduct their business in an ethical and transparent manner, and must not engage in bribery or corruption.

4. 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 the ADT Code of Conduct, govern gift giving, entertainment, loans, and other similar favors.

5. 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 suppliers must 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.
6. 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. Furthermore, suppliers must ensure that their own suppliers and subcontractors also adhere to this Guide and must take steps to address any non-compliance.

7. 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.

Social:

1. Labor standards: Suppliers must comply with all relevant labor laws and regulations, including those related to minimum wage, working hours, and workplace safety.

2. Human rights: Suppliers must respect and protect the human rights of their employees, including the right to freedom of association, collective bargaining, and freedom from harassment and abuse.

3. Forced labor: Suppliers must not use any form of forced or involuntary labor, including debt bondage or human trafficking.

4. Child labor: Suppliers must not employ children under the age of 15 (or the minimum age for employment in the relevant jurisdiction/country), or engage in any practices that exploit or abuse child labor.

5. Non-discrimination: Suppliers must not discriminate against employees on the basis of age, race, gender, gender identity or expression, sexual orientation, disability, veteran status, national origin, religion, or any other protected characteristic.

6. Diversity and inclusion: Suppliers should strive to create a diverse and inclusive workplace, where all employees are treated with respect and have equal opportunities for employment and advancement. This could include policies and practices to address bias, discrimination, and harassment, as well as initiatives to promote diversity in hiring, training, and leadership. Suppliers should be transparent and accountable for their diversity and inclusion practices and outcomes, and should report on their progress in achieving diversity, equity, and inclusion goals.

7. Supplier diversity: Suppliers should promote diversity and inclusion in their own supply chain, by seeking out and doing business with suppliers that are owned by minorities, women, LGBTQ+ individuals, and other underrepresented groups.

8. Community engagement: Suppliers should engage with and support the communities where they operate, including those that are traditionally underserved or marginalized. This could
include partnering with local organizations, supporting education and job training programs, and investing in infrastructure and social initiatives.

9. Health and safety: Suppliers must provide a safe and healthy workplace, and take measures to prevent accidents and injuries.

Environment:

1. Environmental standards: Suppliers must comply with all relevant environmental laws and regulations, and take steps to minimize their environmental impact.

2. Carbon emissions: Suppliers should (or must as required by law) measure and report their carbon emissions, must work to reduce their emissions over time and should (or must as required by law) allow for independent verification and reporting. This could include setting emissions reduction targets, using renewable energy sources, improving energy efficiency, and investing in low-carbon technologies.

3. Carbon offsetting: Suppliers may choose to offset their carbon emissions by supporting carbon reduction projects or purchasing carbon offsets. However, offsetting should not be seen as a substitute for actual emissions reduction.

4. Water Scarcity: ADT recognizes the critical importance of water as a vital resource for human health, agriculture, and industrial production. Suppliers must be transparent about their water use and management practices. Suppliers must upon request provide information on their water consumption, wastewater treatment, and any measures taken to promote responsible water management.

5. Biodiversity: Suppliers are required to ensure that their operations and products do not cause material harm to biodiversity, wildlife, or habitats. This includes responsible sourcing of raw materials, using environmentally-friendly production methods, and minimizing waste and emissions. Suppliers should (or must as required by law) provide regular reports on their biodiversity-related practices, including their impact on biodiversity and the measures taken to protect and conserve it.

6. Product sustainability: Suppliers should consider the environmental impact of their products over their entire lifecycle, from production to disposal. This could include using sustainable materials, reducing waste and packaging, and designing products for reuse or recycling.

7. Product Packaging: It is preferred that suppliers promote sustainable packaging practices that minimize the use of plastic and promote recyclability. This can be achieved through using packaging materials that are reusable, biodegradable, or made from recycled materials.

8. Forestry Preservation: Suppliers must be transparent about the origin of wood-based products used in their operations and products. Suppliers must provide information on the source of the products and any measures taken to ensure responsible sourcing. Suppliers should use best
practices to minimize the impact of their operations on forest ecosystems, including reducing clear-cutting, promoting reforestation, and protecting biodiversity.

9. Ocean Plastics: Plastics have a devastating impact on our oceans and marine life. Suppliers should ensure that their operations and products do not directly contribute to plastic pollution in the ocean. Suppliers should reduce and/or eliminate the use of single-use plastics in their operations and products. Suppliers should provide regular reports on their plastic-related practices, including their impact on the ocean and the measures taken to reduce plastic pollution.

10. Conflict Minerals: Suppliers must promote responsible sourcing practices that ensure that conflict minerals do not enter their supply chain. Suppliers must conduct due diligence on their supply chain to identify and address any risks associated with conflict minerals. Suppliers must be transparent about the origin of the minerals used in their operations and products. Suppliers must provide information on the source of the minerals and any measures taken to ensure responsible sourcing.

11. Rare Earth Minerals: Suppliers must ensure that their operations and products do not contribute to environmental degradation or human rights abuses associated with the extraction and processing of rare earth minerals. Suppliers must provide information on the source of the minerals and any measures taken to ensure responsible sourcing. Suppliers should engage with local communities and stakeholders to ensure that their operations and products respect human rights and promote sustainable development. Suppliers should provide regular reports on their rare earth mineral-related practices, including their efforts to ensure responsible sourcing and any challenges or issues encountered.

By complying with this Supplier Social Responsibility Guide, suppliers demonstrate their commitment to responsible management practices and reducing their impact on the environment. ADT expects all suppliers to adhere to these standards and work collaboratively towards the common goal of responsible supply chain practices.