



# Code of Conduct



# CONTENTS

- 3 Letter from our CEO, Jim DeVries
- 4 What Matters Most at ADT
- 5 The Code Applies to All of Us
  - 6 Consequences of Not Acting Ethically
  - 7 Speak Up
- 8 ADT's Commitment to **Team Members**
  - 9 Diversity and Inclusion
  - 10 Anti-Harassment
  - 11 Promoting a Safe Workplace
  - 12 An Alcohol and Drug-Free Workplace
  - 12 Workplace Violence
  - 13 Respectful Workplace
  - 14 Social Networking
- 15 ADT's Commitment to **Customers**
  - 16 Product and Service Quality
  - 16 Personal Data Protection
- 17 ADT's Commitment to **Investors**
  - 18 Conflicts of Interest
  - 20 Asset Protection
  - 21 Intellectual Property
  - 21 Computer and Communication Systems
  - 22 RecordKeeping and Reporting
  - 23 Insider Trading
  - 24 Audits and Investigations
- 25 ADT's Commitment to **Our Industry**
  - 26 Anti-bribery and Corruption
  - 27 Gifts and Business Entertainment
  - 28 Fair Competition
- 30 ADT's Commitment to **Communities**
  - 31 Health, Safety and the Environment
  - 31 Sustainability
  - 31 Charitable Contributions
  - 32 Communications with Media, Investors and the Public
  - 33 Political Activities
- 34 Getting In Touch
  - 34 Asking Questions
  - 34 Reporting Issues
  - 34 Scope
- 35 Index

# LETTER FROM THE CEO



Dear ADT Colleagues,

Each day millions of our customers trust ADT to protect what they love and cherish the most. Earning and maintaining their confidence is critical to the success of our business, which is why we have the highest ethical standards for our industry.

Our Code of Conduct is our commitment to our customers, communities, partners, dealers, shareholders, and each other. It clearly outlines our standards, policies, laws, and regulations; defines what is expected from us; and provides guidance on specific behaviors and situations. As employees and contractors, each of us is responsible for delivering on this commitment. We need to ensure we create a culture that promotes transparency, safety, and a high standard of ethics. We must speak up if we see something that does not align with our Code or our noble purpose.

As one of the oldest and most admired brands in North America, we need to continue leading with integrity, as we have done for more than 144 years. Without it, true success is not possible.

Thank you,

A handwritten signature in black ink that reads "Jim DeVries". The signature is written in a cursive, flowing style.

**Jim DeVries**

President & CEO

## What Matters Most

Our values are what we stand for. They are based on Five Cultural Markers that anchor us and are What Matters Most to us.



## Voice of the Customer

Understand customer needs and expectations, so we can respond to them.

## Urgency

How we interact with time. Knowing is not enough; we must apply. Willing is not enough, we must do; complacency is virtually absent.

## Accountability

How we interact with our commitments. We will actively monitor performance at individual and team levels to identify opportunities for improvements and commitment to outcomes and solutions.



## Discretionary Effort

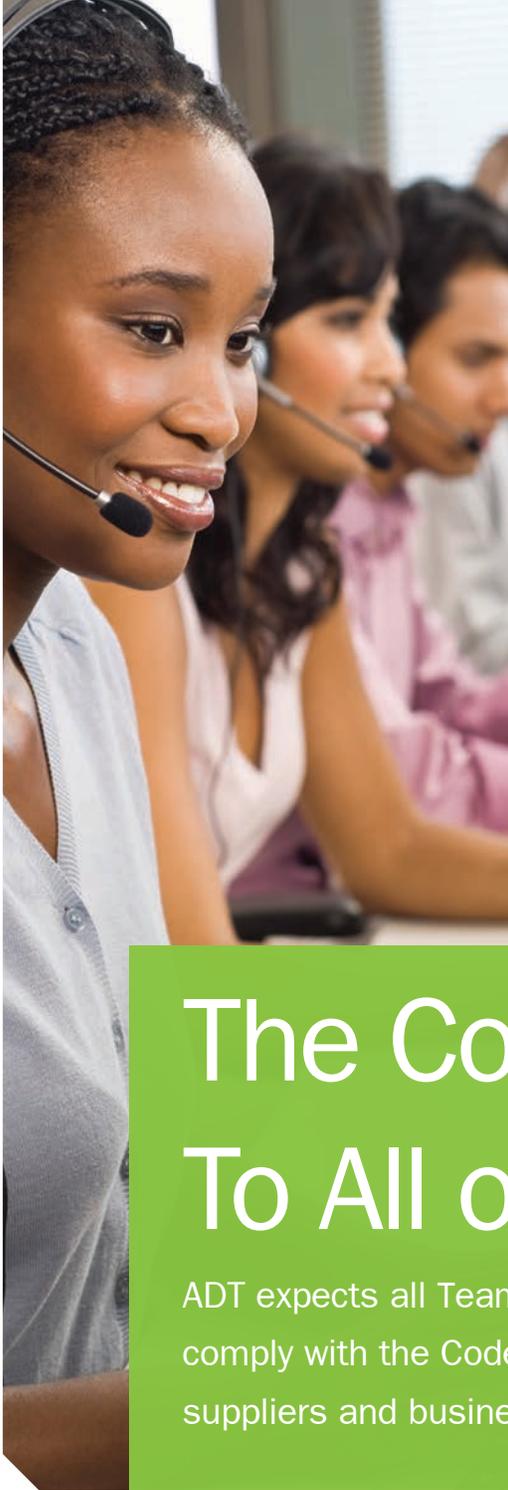
How we interact with ourselves. Achievements of our organization are simply the combined efforts of each individual. Success based on drive and persistence.

## Collaboration

How we interact with each other. We're not about solo acts; a penetrating spirit of teamwork.

## Our Aspiration

To earn the lifelong trust of our customers every day by helping them protect and connect to what matters most – their families, homes and businesses.



# The Code Applies To All of Us

ADT expects all Team Members and contractors of the company to comply with the Code. We expect our third-party partners including suppliers and business partners to act in accordance with its principles.

## Consequences of Not Acting Ethically

Failure to act ethically may adversely affect ADT's business and reputation resulting in serious consequences for our stakeholders including other team members, our investors, customers, business partners, and communities.

If a violation of the Code or related policy is discovered or reported, our management team will take appropriate steps to address the matter and help prevent a similar issue from happening again. These steps may include training, counseling, and disciplinary actions up to and including termination of employment and civil or criminal prosecution.

**Q:** *As a manager, what should I do when an employee raises an ethics or compliance issue?*

**A:** When an employee raises a concern, managers should remain open and responsive. Don't think of a report as "bad news," instead consider it a sign of employee commitment to do the right thing. Report any compliance issues to a human resources representative or the ADT Ethics Office to help determine the appropriate course of action.



## Speak Up

One way to help ensure an ethical environment is to speak up if you see something that seems wrong. If you become aware of a potential violation of the Code, it is your responsibility to report it. ADT has an open door philosophy and encourages all team members to raise concerns through any channel including:

- ▶ Speaking to your manager or any other manager
- ▶ Speaking to a human resources representative
- ▶ Contacting the ADT Ethics Line via phone at (877) 871-5625, email at [ethicsline@adt.com](mailto:ethicsline@adt.com) or website at [www.adtethicsline.com](http://www.adtethicsline.com)

- ▶ Contacting the ADT Ethics Office via phone at (561) 226-2900, email at [adtethicsoffice@adt.com](mailto:adtethicsoffice@adt.com) or mail to ADT Ethics Office, 1501 Yamato Road, Boca Raton, FL 33431

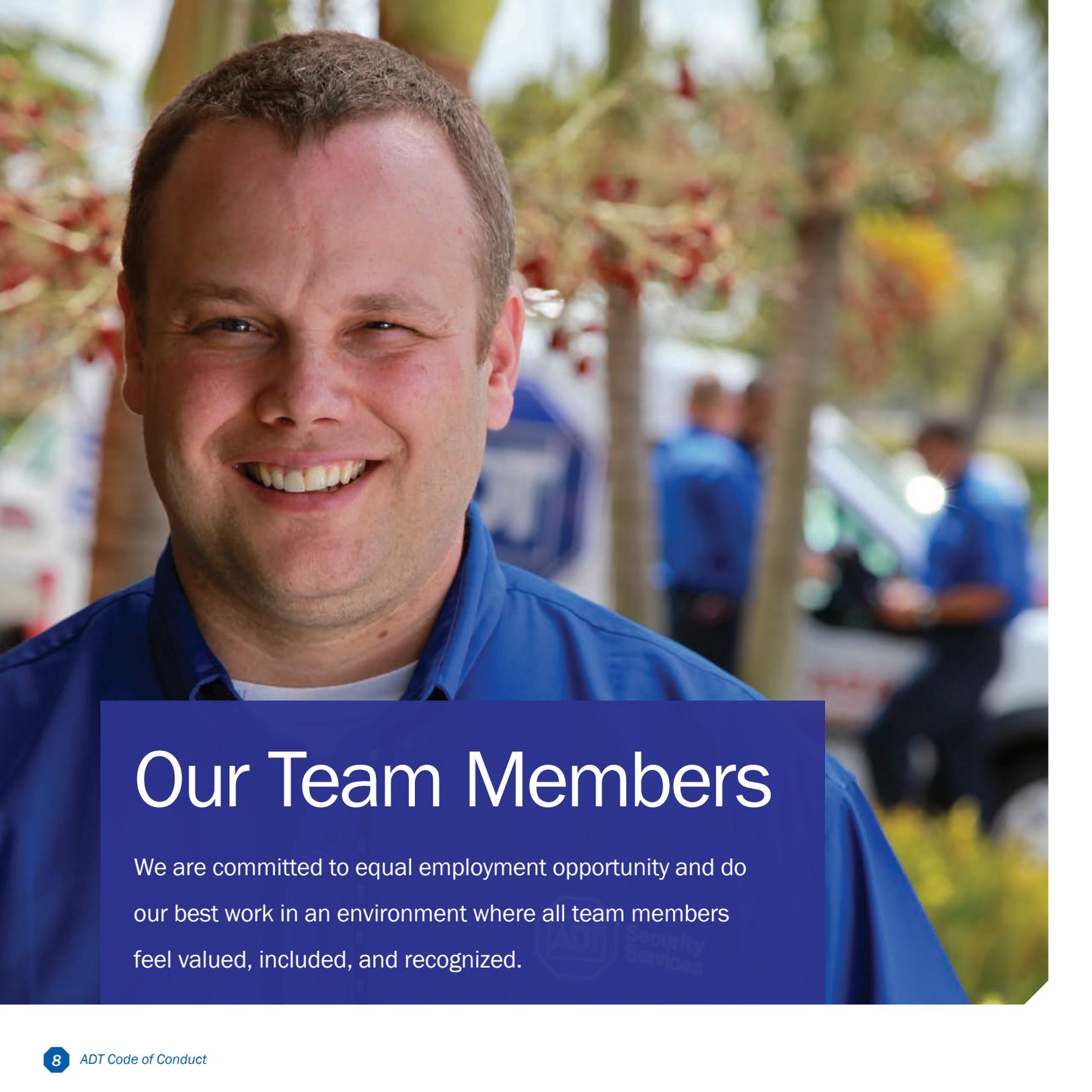
ADT's open door policy includes discussing your questions about what the Code requires and what is the right thing to do in particular circumstances. Speak up and let us know your concerns.

We encourage open discussion of improper or unethical behavior and will take steps to handle each report with the appropriate level of confidentiality. We have zero tolerance for retaliation against those who make good faith reports of concerns or alleged ethical violations or who participate in investigations concerning such matters. If you believe that you have experienced retaliation, report it.



**Q:** *My manager has asked me to do something I believe conflicts with the Code. What should I do?*

**A:** No one at ADT has the right to ask you to do anything unethical – not even your manager. Help us create a safe and ethical workplace by speaking up and reporting the incident.



# Our Team Members

We are committed to equal employment opportunity and do our best work in an environment where all team members feel valued, included, and recognized.

# Diversity and Inclusion

We are committed to equal employment opportunity and do our best work in an environment where all team members feel valued, included, and recognized.

Discrimination is not tolerated regarding:

- ▶ Age
- ▶ Race
- ▶ Color
- ▶ National origin
- ▶ Ethnicity
- ▶ Religion
- ▶ Gender
- ▶ Sexual orientation
- ▶ Marital status
- ▶ Disability
- ▶ Veteran status
- ▶ Genetic information
- ▶ Or any other basis the law prohibits

This commitment extends throughout our business, including recruiting and hiring, compensation, promotions, benefits, transfers, training, education, terminations, and social and recreational programs. We expect managers, department heads, and directors to personally share in this commitment. Through leading by example, managers reinforce the principles that guide our approach to equal opportunities.



**Q:** *I heard a manager say she would not promote a specific team member because he was not born in America. She also used a derogatory term when talking about that person. What should I do?*

**A:** Take immediate action. Discrimination is wrong, illegal, and contrary to ADT policy. National origin must never be a factor in making personnel decisions. Help us create a safe and ethical workplace by speaking up and reporting the incident.

# Anti-Harassment

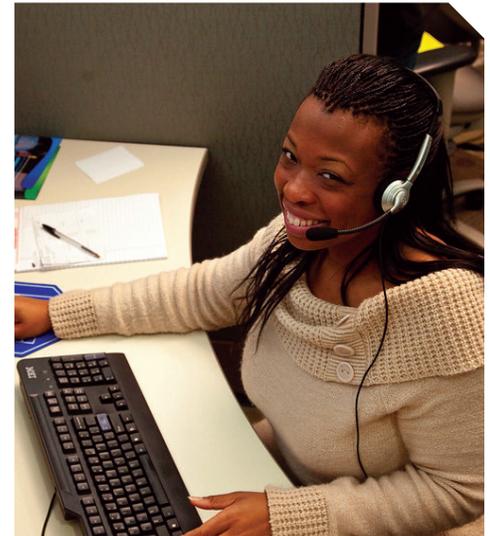
As an extension of our commitment to a fair and diverse workplace, ADT prohibits any sort of harassment. Harassment is unwelcome conduct because of age, race, color, national origin, ethnicity, religion, gender, sexual orientation, marital status, disability, veteran status, genetic information, or other protected characteristic.

Specifically, it is any behavior that creates an intimidating, hostile or offensive work environment.

No team member may cause another person's work performance to suffer or limit their job opportunities by creating this type of environment. Additionally, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature are prohibited where submission to such conduct is made, either explicitly or implicitly, a term or condition of employment or a basis for employment decisions. Work related functions outside of the workplace are also subject to ADT's policies.

**Q:** *Although my colleagues are very polite in person, I'm often copied on emails of a suggestive and vulgar nature. These emails make me very uncomfortable and I've asked my coworkers not to send them. They told me I was being oversensitive. Does this constitute harassment under ADT's policies?*

**A:** If the emails contain offensive name calling, jokes, slurs, negative stereotyping, or threats, then it may be harassment under ADT's policies. This includes jokes that are targeted at individuals or groups based on age, race, color, national origin, ethnicity, religion, gender, sexual orientation, marital status, disability, veteran status, genetic information, or other protected characteristic. It also includes nonverbal conduct, such as staring, leering and giving inappropriate gifts. Finally, visual images, such as derogatory or offensive pictures, cartoons or drawings, may also be considered harassment. Help us create a safe and ethical workplace by speaking up and reporting the incident.



## Promoting a Safe Workplace

Our commitment to safety is part of everything that we do. Each of us is responsible for our own safety and the safety of our coworkers. In order to ensure our safety, each team member is responsible for:

- ▶ Understanding the safety requirements of your job
  - ▶ Complying with your site's health and safety procedures
  - ▶ Attending all required safety training
  - ▶ Analyzing jobs and tasks for hazards/risks and taking appropriate preventive measures, e.g. using personal protective equipment and wearing seat belts
- ▶ Never compromising your safety to improve productivity, efficiency, or sales
  - ▶ Always intervening if you see safety hazards or coworkers who are at risk
  - ▶ Notifying your manager of any safety concerns or hazardous conditions associated with your job
  - ▶ Never instructing anyone to disregard safety procedures
  - ▶ Immediately reporting all work-related injuries or illnesses to your manager
  - ▶ Suggesting ways to improve ADT's health and safety procedures.



**Q:** *My coworker drives a company car without wearing her seatbelt even after our manager instructed us that seatbelts must be worn at all times. How should I handle the situation?*

**A:** If you feel comfortable speaking to your coworker directly to remind her that seatbelts are required, you should do so. If you do not feel comfortable, then speak up. Help us create a safe and ethical workplace by reporting the incident.

# An Alcohol and Drug-Free Workplace

ADT is committed to maintaining an alcohol and drug-free work environment. No alcoholic beverages may be brought into or consumed on company premises, at a company work site, in a company vehicle, or during working hours including break and meal periods. There is a limited exception for alcohol use at company functions. You must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol or using, possessing, or selling illegal drugs while on company time or property is strictly prohibited.

Some team members may be taking prescription or over-the-counter drugs that could impair judgment or skills required for job performance. If you have questions regarding the effect of such medication on your job performance or you observe someone who appears to be impaired in his/her job performance due to the effects of medication, please consult with your manager.

## Workplace Violence

At ADT, we do not tolerate any acts or statements that could:

- ▶ Threaten the safety or security of any coworker or anyone else
- ▶ Cause damage to company or personal property
- ▶ Create fear

We are all entitled to feel safe at work. We take responsibility for each other by maintaining a work environment free of weapons or potentially dangerous devices unless authorized by the company or by applicable law. Each of us must promptly report anything that could threaten or harm another person.

**Q:** *I am concerned that a coworker's use of alcohol may cause a safety problem. I'm afraid he'll be fired if I report this issue. Should I report this issue?*

**A:** Yes. ADT's primary concern is the safety of all team members. There are resources to help team members such as our Employee Assistance Program.



# Respectful Workplace

It is every team member's duty to maintain a safe, productive, and professional workplace, free of bullying, harassment, and violence, in which all employees conduct themselves with respect for one another and for those with whom we deal with on ADT's behalf.

This includes refraining from bullying or harassing behavior that:

- ▶ Is recurrent or serious
- ▶ Is hostile or unwanted
- ▶ Undermines the victim's dignity or psychological or physical integrity
- ▶ Results in a harmful work environment

Prohibited bullying or harassment may be expressed by:

- ▶ Belittling others
- ▶ Isolating others
- ▶ Taunting others or making fun of their convictions, tastes, or political choices
- ▶ Discrediting, spreading rumors, ridiculing or humiliating others



**Q:** *One of my coworkers just learned that his position is being eliminated and he seems very angry about it. In fact, I've heard him make comments that sound like threats against the company. What should I do?*

**A:** No threats against our company or a team member should be ignored or go unreported. If you feel that your coworker is making threats or, if you witness any violent behavior, speak up and report the incident. If the situation escalates and involves an immediate or urgent threat of harm, you should contact local law enforcement officials.

# Social Networking

ADT's active social media presence enhances our brand and strengthens our connections with customers, team members, and other key influencers. When you use social media, please follow these guidelines:

- ▶ Always be professional in all online communities. Don't post content that is discriminatory, harassing, bullying, physically threatening, defamatory, or similarly inappropriate or unlawful.
- ▶ Be honest and disclose who you are online. Always identify yourself as a team member when discussing topics related to ADT.
- ▶ Your opinions are your own, not ADT's. If you refer to ADT or your employment at ADT when participating in social media for personal use, write in the first person, use a personal email address, and include this profile disclaimer: "The views expressed are my own and not the views of my employer."
- ▶ Protect ADT and yourself. Respect ADT's logos, trademarks, and photos of others. Do not disclose ADT's confidential business information such as trade secrets, copyrights, and intellectual property.
- ▶ Understand that anything you post online may be permanent. Search engines can find almost anything you post and it is likely impossible to erase your words after the fact. Be certain you are in compliance with applicable policies and laws.
- ▶ When in doubt, ask for guidance. If you are not sure if you should post something or see questionable information about ADT online, talk to your manager, a human resources representative, the ADT Ethics Line, or the ADT Ethics Office.





# Our Customers

Our customers trust us to help them protect their families, homes, and businesses. We must earn the trust they place in us every day by delivering a consistently excellent customer experience.

## Product and Service Quality

Our customers' health, safety, and well-being are primary concerns. We earn the trust of our customers through our dedication to safety and quality in everything we do. Our business, reputation, and success depend on our commitment to the highest standards and compliance with government and industry standards.

For these reasons, all records regarding the quality of our products and services, including any issues identified, must be accurate and complete. We work every day to earn the trust of our customers through our dedication to safety and quality. Any team member with concerns about product safety or quality should speak up.

## Personal Data Protection

Access to electronic data, such as use of the internet, as well as non-electronic data is often necessary for our business operations and job performance. It is important that the business use of this information is balanced against the risks related to protection of personal privacy and data security.

Personal data, which includes sensitive, non-public information about a person or household, may generally only be collected or used for legitimate purposes as defined by ADT. In addition, ADT will take reasonable precautions to protect personal data and reasonably attempt to provide information to individuals regarding the use and collection of their personal data.

**Q:** *I found a report on the photocopier that contains confidential customer records, including names, credit card and banking information. What should I do?*

**A:** Report this to the ADT Ethics Office immediately. Team members have a duty to protect the confidentiality of customer and employee data at ADT.





# Our Investors

Like our customers, our investors place their trust in us. They trust that we will protect the company's assets and use them to create long term shareholder value. It is our responsibility to make sure our actions protect that trust.

## Conflicts of Interest

Conflicts of interest exist when your personal interests or activities interfere, or appear to interfere, with the interests of the company. A conflict of interest affects your judgment, objectivity, or loyalty to ADT. Such conflicts can arise in many different situations and relationships, and are not always obvious. It is important that your decisions and actions be based on ADT's business needs – not what serves your own personal interests or those of a third party.

To make certain that we act in ADT's best interests, team members are required to disclose any actual or potential conflict of interest. Even if you do not have an actual conflict, others may think you do. To avoid even the appearance of a conflict, seek guidance from your manager, a human resources representative, the ADT Ethics Line or the ADT Ethics Office. The company will work with you to determine appropriate action.

## OUTSIDE EMPLOYMENT

You may not work for a competitor, customer, or supplier while employed at ADT. Any team member desiring to take outside employment, including on a self employed basis, must first obtain written approval from his or her manager. There are times when outside employment may be appropriate, as long as your outside responsibilities do not interfere with your responsibilities at ADT. Such employment must never involve the use of ADT's tools, vehicles, facilities, time, property, or other resources, including computers, software, and customer information.

**Q:** *My roommate and I both work for ADT. Is this a conflict of interest?*

**A:** It depends on your job and its duties. As an example, team members who have a close personal relationship should not report to one another. Inform a human resources representative of this potential conflict of interest so that appropriate steps can be taken to ensure that your jobs do not create an actual conflict of interest.



## PERSONAL RELATIONSHIPS AND FAMILY MEMBERS

You must disclose family or close personal relationships that interfere, or could appear to interfere, with your ability to make objective decisions. You should never hire, supervise, or have influence over a family member or friend without the prior approval of ADT's management. You must disclose any financial interests, employment or third party (such as a vendor or customer) relations, including service on a Board of Directors that you or an immediate family member have with a competitor, customer, or supplier of ADT. Any time you do business with family and friends as an ADT team member, you must also disclose this interest through proper reporting channels.

## BUSINESS OPPORTUNITIES

If you discover a business opportunity, such as a real estate deal or a potential investment through your work at ADT, you must put ADT's interest before your own. You must never take advantage of a corporate opportunity without approval through the proper reporting channels.



**Q:** *On weekends and after work, I sometimes install alarm systems in private homes. Since I'm not doing it during working hours and I am using my own tools and equipment, I figure it must be OK. Am I wrong about this situation?*

**A:** Whenever you do anything that could take business away from ADT, as suggested in your example, you are in breach of our conflict of interest policy. It does not matter if you do it on your own time. If the service is one that ADT provides, it is likely prohibited. There may be cases where such activities are permitted, but they must be preapproved by the ADT Ethics Office.

# Asset Protection

We create value for the company by using our expertise and company assets. We commit to use and protect company assets appropriately and productively. Company assets include physical property, financial assets, proprietary information, data, records, and intellectual property such as brands, inventions and copyrights.

In dealing with ADT's assets, follow these guidelines:

- ▶ Use your best judgment when procuring assets for the company
- ▶ Use care when working with company assets
- ▶ Ensure company assets are protected from misuse or theft
- ▶ Only share company assets outside the company with prior authorization
- ▶ Comply with security requirements to safeguard physical property and other assets
- ▶ Only dispose of company assets with prior authorization
- ▶ Follow applicable policies for asset protection and raise concerns if you think company assets are misused



**Q:** *May I make a copy of a software program from the office to use on my home computer for work purposes?*

**A:** It is illegal to copy computer software or related documentation without the approval of the software product's owner. Some software product licenses may allow you to make a copy for backup, but you should always check with the IT Department before you put software on another computer.



## Intellectual Property

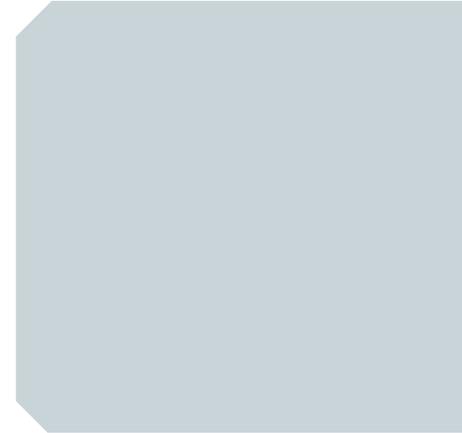
Intellectual property refers to copyrights, trademarks, trade names, patents, trade secrets, and other intangible assets. ADT's intellectual property is embodied in a variety of things: software, hardware and network based technology, inventions and innovations, confidential business processes, customer lists, and other confidential business ideas and information. ADT's intellectual property includes some of our most valuable assets.

Every team member is responsible for protecting our intellectual property and should be familiar with the policies and security guidelines of the team member's business unit with regard to the protection of intellectual property.

We must also respect the valid intellectual property rights of others. The unauthorized use of others' intellectual property can expose the company and individual team members to lawsuits and even criminal penalties.

## Computers and Communications Systems

Among other things, company assets include computers and related equipment and networks (including internet access), software, telephone and voicemail systems, and personal digital devices. Team members must use these assets appropriately, safeguard these resources, and protect the important company data stored on these systems. In addition, because of the sensitive information computers may contain or transmit, team members must follow company policies and procedures regarding the use of these assets, including encrypting computers and protecting them from theft. **Further, all communications and information sent or received using company assets are the company's property and not private communications.** ADT reserves the right to monitor all such communications.



# Recordkeeping and Reporting

ADT is committed to having honest, accurate, and timely financial records and transactions. This standard applies to all records made in the course of operating our business or reporting on its performance, including financial reports, safety records, performance reports, regulatory filings, and all other records of the company.

As a team member, each of us must be truthful in all our actions and communications. Engaging in fraud, which is the act of intentionally cheating, tricking, stealing, deceiving, or lying, is dishonest and may be criminal. Intentional acts of fraud are subject to disciplinary action. Examples of fraud include:

- ▶ Submitting false expense reports
- ▶ Forging or altering checks
- ▶ Signing contracts on behalf of the customer or falsifying sales in any manner
- ▶ Misappropriating assets or misusing company property

**Q:** *I've been asked to delay accruing some expenses until the next reporting period. I was told that as long as these expenses get reported during the appropriate fiscal year, there is nothing wrong with doing this. Is this correct?*

**A:** No. Our monthly and quarterly reports are as important as our annual financial filings. Intentionally delaying expenses or revenues could expose ADT and individual team members to civil or criminal penalties.

**Q:** *I have a temporary personal expense that I don't have room on my personal credit card to charge, so is it ok if charge it to my company card until I can pay it off?*

**A:** No. Our policy prohibits misuse of the company issued credit card that should only be used for legitimate business expenses.



- ▶ Inflating sales numbers in any manner which does not reflect actual sales and services performed
- ▶ Making an entry in company records that is intentionally not in accordance with proper accounting standards

As a team member, each of us is obligated to uphold all relevant financial accounting and reporting standards and regulations. Our financial records must be:

- ▶ Complete, accurate and timely
- ▶ Properly supported and documented
- ▶ Fair and objective
- ▶ Shared only with proper authorization

## Insider Trading

Our policies and relevant laws prohibit each of us from buying and selling ADT stock or any other kind of public security such as stocks, bonds, or options, based on inside information.



*For more information, see our [Insider Trading policy](#).*

**Q:** *My uncle asked me some very specific questions about ADT's business. Can I discuss these issues with family members as long as they promise to keep the information confidential?*

**A:** ADT's policy on confidential business information and insider trading rules apply to your family and anyone living in your home. Never share confidential business information about ADT with family members or friends.

It is also illegal and unethical to provide inside information about ADT to individuals outside of the company or to trade the securities of our customers and suppliers based on their inside information.

In the course of our work at ADT, each of us may learn material non-public information about ADT or other companies that could affect a decision whether or not to buy, sell, or hold securities. If you trade securities while you have this material, non-public information, it violates insider trading laws. In general, information is “material” if a reasonable investor would consider it important in deciding whether to trade. Information is “non-public” if it is not known to the public-at-large. Examples of material, non-public information include a potential purchase or sale of a business, significant undisclosed financial information, the potential loss or addition of a major contract, potential change in dividend policy, or an upcoming major senior management change.

## Audits and Investigations

We cooperate fully with and promptly respond to all requests from government agencies and external auditors with truthful and accurate information. We do not mislead any investigator and do not falsify or alter documents and records related to a government request or investigation.

To ensure an appropriate response to a government authority and the protection of ADT’s rights, a team member receiving a request from a government authority for information about the company or obtaining information suggesting a government investigation, should first promptly report such information to ADT’s Law Department for guidance.



# Our Industry

As the leader in our industry, ADT must also be a leader in setting the standard for ethical business conduct. We believe in fairness in competition and always strive to maintain our position by supplying the best products and services available. We do not win business by taking shortcuts and we deal with governments, competitors, suppliers, and business partners in an honest, fair, and transparent manner.

# Anti-Bribery and Corruption

ADT's reputation depends on acting with integrity in our business dealings as required by legal and ethical standards. We compete on the basis of the quality of our products and services, pricing, and reputation.

In no circumstance may an ADT officer, director, agent, contractor, or team member ever offer, pay, or receive a bribe, kickback, or any other kind of inappropriate payment to win business, to influence a business or procurement decision, or to advance our interests with government authorities.

Bribes can take many forms, including:

- ▶ Money
- ▶ Gifts or gratuities
- ▶ Kickbacks
- ▶ Unwarranted rebates or excessive commissions
- ▶ Unusual or disguised allowances, expenses, or political or charitable contributions
- ▶ Offering jobs to customers, their family members, or friends
- ▶ Anything else of value

Bribery is prohibited not just for team members, but also for third parties that conduct business on our behalf, including our suppliers, subcontractors, and others. If ADT cannot do something, then neither can our third parties.

No business objective or opportunity, no matter how important or potentially lucrative, is worth the legal liability, financial sanctions, sacrifice of our reputation, or trust of our stakeholders.

## Gifts and Business Entertainment

At ADT, we do not give or receive inappropriate gifts or entertainment. In many cultures, gifts and entertainment are an important means of creating goodwill and promoting business relationships. All team members must avoid giving or receiving any gift or entertainment of an inappropriate nature or value. Generally, giving and accepting gifts and entertainment are appropriate if:

- ▶ Infrequent and not excessive in value
- ▶ Directly related to building customer or supplier relationships
- ▶ Never cash or cash equivalents like gift cards
- ▶ Never tied to a potential contract or bid
- ▶ Logo items whenever possible
- ▶ Reported in compliance with ADT's policies
- ▶ Modest meals when business related, not excessive, and with a customer, supplier, or contractor



**Q:** *A supplier I've known for years shares my love of the same musical artist and we've discussed this often. This musical artist is scheduled to come to town on a concert tour, and the supplier has offered to buy me tickets for the show. Is it OK to accept them since we give their company a lot of business?*

**A:** While it may be tempting, we should never accept any gifts that could appear to influence business decisions. Only nominal gifts are acceptable and tickets to a concert are clearly valuable items. For more information regarding specific limits and types of gifts, contact the ADT Ethics Office.

## Fair Competition

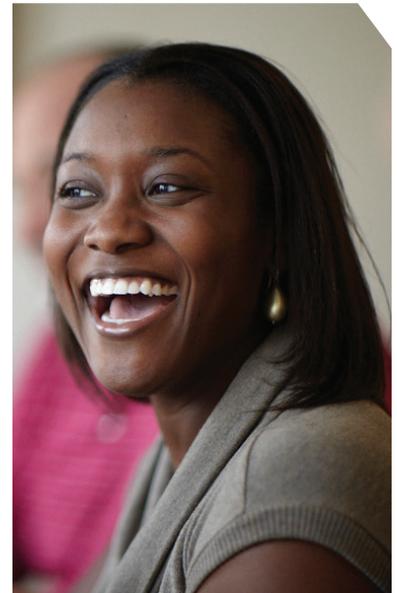
ADT seeks to outperform our competitors fairly and honestly. ADT complies with federal and state antitrust laws prohibiting conduct that goes beyond fair competition and has the potential to harm competitors, to drive them out of business, or to prevent new competition. These laws regulate our interactions with our competitors.

You must never agree with a competitor to:

- ▶ Set or control prices, credit terms, or other financial terms
- ▶ Divide markets or orders
- ▶ Set quantities of products and services to be produced or provided
- ▶ Set terms or fix the outcome of a bidding process
- ▶ Boycott suppliers or customers
- ▶ Set quantities or types of products to be produced or sold

**Q:** *I was at a recent professional association meeting where our competitors are frequently represented. An employee of a large competitor was discussing pricing and market segmentation. I left the meeting because I'd heard that these sorts of discussions were illegal. Did I have to leave?*

**A:** You did the right thing. We can discuss general topics with our competitors in an open forum, but as soon as the discussion includes markets, pricing, or specific customers, there is the potential for being accused of illegal anticompetitive activities. You should always excuse yourself from any such discussions and contact the ADT Ethics Office.



You must also never:

- ▶ Make false or misleading statements disparaging our competitor's products or services
- ▶ Violate valid - enforceable non-competition or non-solicitation agreements with a prior employer (Any Team Member with a non-competition or non-solicitation agreement with a prior employer should seek guidance from ADT's Law Department)
- ▶ Gain competitive intelligence through deceit, theft, or unfairly obtaining confidential information, including confidential information learned through prior employment
- ▶ Participate in organizations with competitors that discuss pricing, markets, or other prohibited topics
- ▶ Discuss pricing, sales terms, markets, customers, or territories with competitors at trade shows or meetings

Learn about, understand, and obey the legal requirements regulating activities that are considered anticompetitive in the jurisdictions where you work. Violations of competition or antitrust laws, whether deliberate or accidental, can expose both ADT and you personally to civil and criminal penalties and lawsuits.





# Our Communities

Our commitment to our customers and their safety extends to the communities in which we live and work. ADT encourages each of us to become actively involved in the life of our communities by participating in initiatives that improve the quality of life of our colleagues and neighbors.

## Health, Safety and the Environment

Our commitment to the environment, health, and safety extends beyond our work sites to our customers and the communities where we operate. We conduct our business in ways that protect people and respect the environment. We are committed to complying with all applicable environmental, health, and safety laws and regulations. Our commitment extends to proactive initiatives to minimize the environmental impacts of our products and services and prevent injuries to our people.

## Sustainability

At ADT, we know the importance of protecting the environment and believe that every environmental incident is preventable. We will continue to be proactive in our approach to mitigate the environmental impacts of our business. We take our social responsibilities seriously and are committed to growing our business in a sustainable fashion.

For these reasons, we are committed to minimizing impacts on the environment by reducing our greenhouse gas emissions, waste, energy, and water use.

## Charitable Contributions

Although ADT encourages personal charitable giving, charitable gifts and donations cannot be made using ADT's funds without the prior approval of Corporate Communications. If you would like ADT to make a charitable gift, please email [communications@adt.com](mailto:communications@adt.com) with information on the opportunity.



## Communications with Media, Investors, and the Public

ADT values our relationships with the news media, our investors, and other key stakeholders. We communicate openly and actively with the news media and investment community. We recognize our responsibility as a public company to provide complete, timely, accurate, and objective information about our financial and operational performance as well as our strategy and prospects.

All media inquiries should be directed to ADT Communications at [communications@adt.com](mailto:communications@adt.com).

ADT's Investor Relations department handles dissemination of information and interactions with financial analysts and institutions. All investor-related inquiries from financial analysts, institutional and individual investors, and others should be directed to Investor Relations at [investorrelations@adt.com](mailto:investorrelations@adt.com).

**Q:** *I've been asked to give a presentation at a conference. Members of the media will be there. Can I answer them if they ask me questions about the company?*

**A:** Any presentation as a representative of ADT must be approved by the ADT Communications team, who will also coordinate legal review. At the event, you may discuss the content of your presentation. If you get questions outside the scope of your presentation, please offer to connect the journalist with ADT Communications in follow up to the event.



# Political Activities

## PERSONAL INVOLVEMENT

ADT supports the involvement of individuals in the political process. As an individual, you are welcome to engage in the political process in any way the law permits, including donating money to the candidates of your choice and volunteering on campaigns. However, when participating in the political process, you must be clear that you are acting as a private citizen and not as a representative of ADT.

We discourage team members from running for or accepting public office while working full time at ADT. If you wish to run for political office, you must first notify the ADT Ethics Office.

## CORPORATE INVOLVEMENT

As a company, ADT does not donate corporate money, services, products, or facilities to any political party, candidate, or political committee without prior approval of management and notice to the ADT Ethics Office. Election laws broadly define “contribution” to include money and also use of any asset or resource to solicit donations or support, such as company email.



# GETTING IN TOUCH

If you have questions about this Code, its associated policies, or would like to report a Code violation, you can do so through a variety of methods. Your manager should usually be your first contact for ethics and compliance questions. If you have additional questions, or your manager is for any reason not an appropriate resource, you can contact a representative of human resources or the ADT Ethics Office and you can always call the Ethics Line.

## ASKING QUESTIONS

For additional information about the Code, specific applications, or related policies, the ADT Ethics Office is here to answer your questions. You can reach the ADT Ethics Office through the following channels:

-  Phone: (561) 226-2900
-  Email: at [adtethicsoffice@adt.com](mailto:adtethicsoffice@adt.com)
-  Mail: ADT Ethics Office  
1501 Yamato Road  
Boca Raton, FL 33431

## REPORTING ISSUES

To report a suspected violation of the Code, or for any other concerns that you would like to report, you can call the ADT Ethics Line. Though giving your name helps us respond more comprehensively to your call, you can always contact the ADT Ethics Line anonymously via:

-  Phone: (877) 871-5625
-  Email: [ethicsline@adt.com](mailto:ethicsline@adt.com)
-  Web: [www.adtethicsline.com](http://www.adtethicsline.com)

## SCOPE

The information in the Code supplements corporate, business, and local policies related to the content discussed within the Code. The Code offers general guidelines and is subject to applicable federal, state, provincial, and/or local law. It is not intended to be all-inclusive.

# INDEX

- A**
  - Alcohol 12
  - Asset Protection 20
  - Audits 24
- B**
  - Bribery 26
  - Boycotts 28
  - Business Opportunities 19
- C**
  - Company Assets 20
  - Competitors 25
  - Confidential Information 29
  - Charitable Contributions 31
  - Communications with Media, Investors and the Public 32
  - Competition 28
  - Competitive Intelligence 29
  - Computers and Communications Systems 21
  - Conflicts of Interest 18
  - Contact Information 7, 34
  - Corruption 26
- D**
  - Discrimination 9
  - Drugs 12
- E**
  - Entertainment 27
  - Environment 31
- F**
  - Family Members 19, 23, 26
  - Financial Records 22
  - Fraud 22
- G**
  - Gifts 27, 31
- H**
  - Harassment 10
- I**
  - Insider Trading 23-24
  - Intellectual Property 21
  - Investigations 7, 24
  - Investor Relations 32
  - Investors 6, 17
- M**
  - Media 14, 32
- O**
  - Outside Employment 18
- P**
  - Personal Data Protection 16
  - Personal Relationships 19
  - Political Activities 33
  - Product Quality 16, 28
- R**
  - Recordkeeping 22-23
  - Reporting 7, 9, 10, 11, 22, 34
- S**
  - Safety 11, 12, 13, 16, 22, 24, 30 -31
  - Social Networking 14
  - Sustainability 31
- T**
  - Threats 10, 13
- V**
  - Violence 13
- W**
  - Weapons 13

---

We are all responsible for creating a culture of trust and integrity at ADT.

Call or email if you have a concern or become aware of any violation of our Code of Conduct.



**877-871-5625**

Toll-free anonymous number is available 24/7 in English, French and Spanish.



Email:

[ethicsline@adt.com](mailto:ethicsline@adt.com)



Report a concern at:

[www.adtethicsline.com](http://www.adtethicsline.com)

