



Code of Conduct

Contents

3 A 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 Computers and communication systems

22 Record-keeping and reporting

23 Insider trading

23 Audits and investigations

27 ADT's Commitment to Our Industry

24 Anti-bribery and corruption

25 Gifts and business entertainment

26 Fair competition

27 Ethical supply chain

28 ADT's Commitment to Communities

29 Health, safety and the environment

29 Sustainability

29 Charitable contributions

30 Communications with media,
investors and the public

31 Political activities

32 Getting in Touch

32 Asking questions

32 Reporting issues

32 Scope

33 Index

Letter from our CEO



Dear ADT Team Members,

Millions of customers trust ADT for safe, smart and sustainable solutions that empower them to protect and connect to what matters most.

Undeniably, we earn our customers' trust in their moment of need, but we also earn it every minute of every day by adhering to the highest ethical standards across everything we do.

These standards are spelled out in our ADT Code of Conduct, which is our commitment to each other and to our customers, communities, partners, dealers and shareholders.

Our Code includes not only specific standards, policies, laws and regulations that are to be followed, but also provides guidance on expected behaviors and handling challenging situations.

As employees and contractors, each of us is responsible for ensuring we remain true to our Code and for speaking up if something is not right.

Deservedly, we're one of the most admired and trusted brands in the United States not only by protecting our customers, but also by leading with ethics and integrity throughout our 148 years. Our continued success depends on all of us remaining committed to these high standards. Your diligence is appreciated.

Respectfully,

Jim DeVries
President & CEO

What Matters Most

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

Urgency

How we interact with time. Knowing isn't enough; we must apply. Willing isn't enough; we must do; complacency is virtually absent.



Voice of the Customer

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

Collaboration

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



Discretionary Effort

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

Accountability

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

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's 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 ethics@adt.com, or website at www.adtethicsline.com
- Contacting the ADT Ethics Office via phone at (561) 226-2900, email at 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's 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 you've experienced retaliation, report it.

[For more information, see our Non-Retaliation policy.](#)



Q: My manager 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're 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're 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
- Sex, gender, gender identity, gender expression
- Sexual orientation
- Marital status
- Disability
- Veteran status
- Pregnancy
- 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.

[For more information see our Equal Employment Opportunity Policy](#)

Q: I heard my 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, sex, pregnancy, gender (including gender identity or expression), sexual orientation, marital status, disability, veteran status, genetic information or any other protected characteristics. Specifically, it's 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 and use of social media and online forums are also subject to ADT's policies.

[For more information, see our Anti-Harassment policy.](#)

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 characteristics. It also includes nonverbal conduct, such as staring, leering and giving inappropriate gifts. Finally, it includes visual images, such as derogatory or offensive pictures.

Promoting a safe workplace

Our commitment to safety is part of everything 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

[For more information, see our Environment, Health & Safety Management System and EHS Roles and Responsibility policies.](#)



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 don't 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, marijuana or illegal drugs 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's a limited exception for alcohol use at company functions. Reporting to work while impaired by marijuana, any illegal drug or alcohol 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 their job performance due to the effects of medication, illegal drugs, alcohol or marijuana, please consult with your manager.

Workplace violence

At ADT, we don't 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're 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. Each of us must promptly report anything that could threaten or harm another person.

[For more information, see our Drug and Alcohol policy.](#)

Q: I'm 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's 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 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.

A photograph of two women in professional attire. The woman on the left has long, straight brown hair and is wearing a dark blue blazer over a light blue collared shirt. She is holding a black tablet in her left hand and pointing her right index finger upwards. The woman on the right has long, wavy brown hair and is wearing a white button-down shirt. She is smiling and looking towards the right. The background is a bright, modern office space with large windows and green plants.

Our customers

Our customers trust us to help them protect their families, property and businesses; and power their homes in a sustainable way. 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 our 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's important that our 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.

[For more information, see our Personal Data Protection & Privacy policy.](#)



Q:

If I send sensitive data in an email attachment to a vendor, is it okay as long as we have a contract with the vendor?

A:

No. Not only should there be contract provisions regarding the protection of sensitive data, but the data must also be encrypted to prevent it from falling into the wrong hands.



Our investors

Like our customers, our investors place their trust in us. They trust we'll protect the company's assets and use them to create long-term shareholder value. It's 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 aren't always obvious. It's 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 don't 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 customer or supplier in situations that create a conflict of interest, or for a competitor 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 don't 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.

[For more information, see our Conflicts of Interest, Gift and Entertainment policy.](#)

Q: My father owns a controlling interest in a company that supplies materials to ADT. I was recently promoted, and in my new position I now have purchasing authority. Is this a potential conflict of interest?

A: Yes. You need to disclose this relationship to management or the ADT Ethics Office and recuse yourself from any business dealings with or related to your father's company.

Personal relationships and family members

You must never allow a personal relationship to interfere with your ability to make business decisions, including but not limited to hiring decisions. 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 relations, including service on a Board of Directors, that you or an immediate family member has 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.

[For more information, see our Conflicts of Interest, Gift and Entertainment policy.](#)

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'm 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 away from ADT, as suggested in your example, you're in breach of our conflicts of interest policy. It doesn't matter if you do it on your own time. If the service is one that ADT provides, it's 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 company security requirements to safeguard data, records, 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

[For more information, see our Asset Protection policy, and Intellectual Property policy – Patents, Trademarks, Copyrights, Trade Secrets & Other Confidential Information.](#)

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

A: It's 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 third-party 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.

[For more information, see our Intellectual Property policy – Patents, Trademarks, Copyrights, Trade Secrets & Other Confidential Information and IT Security & Risk Management Acceptable Use policy.](#)

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 - computers and communications systems
- Inflating sales numbers in any manner that doesn't reflect actual sales and services performed
- Making an entry in company records that's 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
- ✓ Maintained in accordance with legal requirements and our records policies and procedures.

Q:

I've been asked to delay accruing some expenses. As long as these expenses get reported during the appropriate fiscal year, there's 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. Is it ok if I 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.

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.

It's 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, or where it's likely to have a significant impact on the market price of the security. Information is "non-public" if it's 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.

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

Q: My uncle asked me some very specific questions about ADT's business. Can I discuss 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 applies to your family and anyone living in your home. Never share confidential business information about ADT with family members or friends.

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 don't mislead any investigator and don't 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.

[For more information, see our Audits and Investigations and Recordkeeping and Reporting policies.](#)

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

A violation of this policy can occur even if the bribe or the improper offering fails to achieve the purpose for which it was intended. The mere offer or promise of a bribe or other improper benefit is sufficient to cause a violation. 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.

[For more information, see our Anti-Bribery and Corruption policy.](#)

Gifts and business entertainment

At ADT, we don't give or receive inappropriate gifts or entertainment. Except in limited circumstances and with the approval of the ADT Ethics Office, employees may not give gifts of cash or its equivalent (including cash-redeemable gift cards or gift certificates, stocks or other forms of marketable securities) to any present or potential customer, vendor, supplier, contractor or partner of ADT. Employees and their relatives may not borrow or receive money or its equivalent (including cash-redeemable gift cards or gift certificates, stocks or other forms of marketable securities) from any present or potential customer, vendor, supplier, contractor or partner of the Company.

In many cultures, gifts and entertainment are an important means of creating goodwill and promoting business relationships. Gifts of nominal value are permissible where intended to create goodwill and establish trust in a business relationship and wouldn't reasonably be expected to affect the recipient's independent judgment in the performance of their job. 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

[For more information, see our Conflicts of Interest, Gifts and Entertainment policy.](#)

Q: A supplier I've known for years shares my love of the same musical artist. This musical artist is scheduled to come to town on a concert tour, and the supplier has offered to buy me tickets. 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, terms or conditions of sales, discounts, 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's 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 competitors' 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 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.

[For more information, see our Antitrust and Obtaining Competitive Intelligence policies.](#)

Ethical supply chain and procurement

We require our suppliers of products and services to conduct their business ethically and lawfully with respect to human rights, child and forced labor, worker welfare, corruption and bribery, environmental sustainability and diversity.

[For more information, see our Supplier Social Responsibility Guide](#)



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 and health 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're 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 nearly all environmental incidents are generally preventable. We'll 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're committed to minimizing impact on the environment by reducing our greenhouse gas emissions, waste, energy use and water use. In addition, ADT Solar helps our customers use more sustainable energy and firmly positions us as an energy management provider.

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'd like ADT to make a charitable gift, please email communications@adt.com with information on the opportunity that directly relates to our safe, smart and sustainable company identity.

[For more information, see ADT's Environment, Health, Safety & Wellness policy and Vision statement.](#)



[For more information, see ADT's ESG Report](#)

[For more information, see our Charitable Contributions policy.](#)

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 media@adt.com.

ADT's Investor Relations department handles the 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.

[For more information, see our Communications with Media, Investors and the Public policy.](#)

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'll 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're 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're acting as a private citizen and not as a representative of ADT.

If an employee pursues or enters elected or appointed public office, such activities may not interfere with the employee's job or create a conflict of interest. Prospective candidates should first notify the ADT Ethics Office to resolve potential conflicts.

Corporate involvement

As a company, ADT doesn't 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 the use of any asset or resource to solicit donations or support, such as company email.

[For more information, see our Political Activities policy.](#)

Getting in touch

If you have questions about this Code or any of our 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

📧 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'd 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

🌐 Web: 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's not intended to be all-inclusive.

Index

A

Alcohol 12
Asset protection 20
Audits 24

B

Bribery 26
Business opportunities 19

C

Company assets 20
Competitors 25
Confidential information 29
Charitable contributions 31
Communications with media,
investors and the public 31
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

Supply chain 28

T

Threats 12

V

Violence 12

We're 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

CALL:

877-871-5625

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

REPORT A CONCERN:

www.adtethicsline.com

EMAIL:

ethicsline@adt.com