

California Transparency in Supply Chains Act Disclosure

Vistance Networks is committed to ethical, legal, and socially responsible business practices, and we expect our suppliers to uphold these standards through compliance with our [Supplier Code of Conduct](#).

We expect our suppliers to follow this code and conduct business ethically and in compliance with all applicable laws and regulations, including those related to anti-corruption, environmental protection, occupational health and safety, and labor practices. Suppliers must also work to eliminate slavery and human trafficking from their operations and supply chains.

Our suppliers shall respect and support the protection of human rights of their workers and others affected by their activities. Although there may be different legal and cultural environments applicable to our suppliers, our Supplier Code of Conduct requires each supplier to meet a ***“Freely Chosen Employment, Prohibition of Forced Labor” standard, which expressly prevents the use of any form of forced labor, including but not limited to bonded (including debt bonded), indentured or involuntary prison labor, slavery or human trafficking. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.***

Our suppliers are required to provide written confirmation of their adherence to our Supplier Code of Conduct.

In accordance with the international standards supporting our management systems, Vistance Networks’ representatives, directly or through engagement of third-party auditors, assess regularly risks and opportunities related to labor, ethics and environmental, health and safety practices throughout our supply chain. This includes on-site audits and inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess suppliers’ performance. Vistance Networks schedules supplier audits based on a risk assessment approach. These activities are part of our supplier selection and supplier management process.

As a Responsible Business Alliance (RBA) member company, Vistance Networks is committed to adopt the RBA Code of Conduct and use the RBA tools and processes in supplier assessment. Additionally, we use a supply chain risk management tool, SAYARI Graph, to perform due diligence, supply chain mapping and risk assessment. The tool screens for more than 70 risk factors covering six thematic categories including sanctions, forced labor, and export controls.

Vistance Networks works with its suppliers to address risks and gaps identified during the audits and assessments and expects any gaps to be closed within a specified timeframe. If identified risks and gaps are unacceptable, Vistance Networks reserves the right to disqualify any potential supplier or terminate its relationship with any current supplier.

Vistance Networks is a participating member of the Responsible Minerals Initiative (RMI)—contributing to independent third-party audits and due diligence programs of conflict minerals

smelters and refiners. We conduct an annual Reasonable Country of Origin Inquiry (RCOI) into the source of any conflict minerals and extended minerals present in our products by collecting data from our suppliers using the industry standard Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT), respectively.

Vistance Networks employees are trained in our Code of Ethics and Business Conduct, Labor Policy and other applicable corporate, regional and site-specific policies and procedures where responsibilities and accountabilities are clearly described.

More information related to the identified corporate responsibility and sustainability (CRS) material issues, risks and opportunities is outlined in our annual [Sustainability Reports](#).

This disclosure is intended to comply with the California Transparency in Supply Chains Act. For further information, please refer to related Vistance Networks policies: [Code of Ethics and Business Conduct](#), [Labor Policy](#), [Supplier Code of Conduct](#).