



Partner Code of Conduct

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Introduction

At Metaswitch, we care deeply about the people who help build our products and deliver our services, and the planet we all share. So, we hold ourselves and our suppliers to the highest standards to ensure everyone is treated fairly.

The Metaswitch Code of Conduct consistently sets the bar high for safe, respectful workplaces and environmental protections. The Code applies to our partners at all levels and must be upheld even when it exceeds local, regional and country laws.

We require our suppliers to be compliant with the policies in this code of conduct, to treat their employees with dignity and respect. They must provide fair working hours, a safe workplace and an environment free from discrimination. If permitted, suppliers should ensure that subcontractors and suppliers are also compliant to the Code of Conduct.

Labor and Human Rights

Diversity and inclusion

Metaswitch's commitment to diversity and inclusion is core to our values and culture. Every person can bring different ideas, knowledge, perspectives and culture which we recognize is a key factor to successful innovation. Our goal is that each individual feels respected, supported and included. We expect our partners to follow these practices and lead by example. No one should be treated differently to anyone else because of race, sex, religion/beliefs, national or ethnic origin, veteran status, disability, marital or civil partnership status, age, maternity or paternity status, sexual orientation, gender identity or any other characteristics.

Human Rights

Metaswitch believes our products and services can provide a positive impact and allowing individuals to exercise their rights and freedoms through the power of worldwide communications. We support the International Bill of Human Rights and the civil, political, economic, social and culture rights it outlines. We expect our partners to treat people fairly, respecting the rights and dignity of everyone they deal with in their business relationships. Partners should avoid infringing people's rights and address any negative impacts which could be linked to their business relationships.

Modern Slavery

Metaswitch is committed to ensuring that there are no instances of modern slavery occurring within its own business or supply chains. Modern slavery is an increasing global issue. This includes but isn't limited to human trafficking, forced, involuntary, indentured, bonded, child, or prison labor. Any unfair labor practice of this kind is not acceptable in our own operations nor those who work with us or on our behalf. We expect our partners and all those involved in their own business dealings to follow the same principles and treat all people fairly.

Fair treatment and equal opportunity

Metaswitch believes all individuals should be treated with dignity, respect and have the ability to work within an environment which is free from discrimination or harassment of any kind. We do not tolerate unfair treatment, discrimination or harassment of any kind. We expect our partners to maintain workplaces with the same practices and not engage in the physical, mental, verbal, sexual abuse or inhumane or degrading treatment or any form of harassment.

Compensation, benefits and working hours

Metaswitch strongly believes people should be recognized and rewarded equitably and fairly for their skills, contribution and performance. We expect our partners to have the same practice of fairly compensating all employees by providing wages and benefits in accordance with all applicable laws, including those relating to minimum wages, overtime hours, rest periods and other legally mandated benefits.

Health and Safety

Metaswitch is committed to the health, safety and welfare of employees, contractors, visitors and all other individuals affected by their business. We expect our partners to have the same commitment to all individuals and responsibly provide a safe and healthy place to work where conditions are clean, lawful and individuals are properly trained and qualified to perform work functions safely.

Environment

Sustainability

Metaswitch expect suppliers to comply with all applicable environmental legislation and regulations, including the handling of dangerous and hazardous materials. Metaswitch is committed to conducting our business with integrity and making a positive contribution to our environment. We embrace environmental sustainability and not only focus on areas of recycling, consuming less, reusing and managing energies and resource wisely, but also developing technologies that can change the way we live for future generations. We expect our partners to embrace these values and environmental sustainability to continue making a positive impact on the world.

Ethics

Conflict minerals

Metaswitch is committed to ensuring our products are responsibly manufactured. Our partners are expected to ensure the same level of responsibility that products do not contain material derived from “conflict minerals” and which can find their way into a variety of different equipment used by the electronics and telecommunications industries.

Conflict of Interest

We all have a duty to avoid interests, activities or relationships that conflict or interfere with our judgement, objectivity or independence in performing our roles.

Suppliers must implement appropriate mitigations against any real or perceived conflict of interest through their work with Metaswitch. Suppliers must disclose to Metaswitch any actual or perceived conflicts of interest (e.g. financial or other interests a Metaswitch employee may hold in your business) immediately. Suppliers must also disclose in advance any relationship with a Metaswitch director, employee or person working with Metaswitch that represents or might appear to represent a conflict of interest.

Privacy, GDPR and Regional Privacy Laws

Metaswitch takes the protection and confidentiality of company, private and personal data very seriously. We require our partners to uphold the same responsibility to handle, protect and manage all data they encounter in compliance with all applicable privacy rules and regulations where both Metaswitch and they conduct business worldwide.

Any such information obtained by our suppliers, other third parties and non-fee suppliers acting on your behalf is expected only to be used as directed by Metaswitch Networks. Any personal data about an individual must be kept in line with General Data Protection Regulations in Europe, the California Consumer Privacy Act in California, USA, and/or any other regional data privacy laws that are applicable to the supplier or the territory in which the services are provided, and for no longer than is necessary to carry out the specified work. Suppliers, other third parties and non-fee suppliers will need to demonstrate their processes for retention and deletion of data. Personal information must not be passed to any third party without the express written permission of Metaswitch Networks or the person concerned. Any information obtained by a supplier, other third party and non-fee supplier about Metaswitch Networks business must not be disclosed to a third party unless permission has been obtained in writing from Metaswitch Networks.

Under the EU General Data Protection effective from 25th May 2018, Metaswitch is obligated as a **Data Processor** to notify the Information Commissioner of any data breach within 72 consecutive hours of becoming aware of the breach even if it applies to the activities of a third-party data processor such as a supplier. In order to give Metaswitch Networks enough time to investigate and notify the Information Commissioner we require suppliers to commit to notifying Metaswitch Network of any breach of Metaswitch personal data within 24 hours of the supplier becoming aware of the data breach. So, as an approved Metaswitch supplier, you must adhere to this code of conduct, and you are agreeing to ensure that you will notify Metaswitch Networks of any breach of Metaswitch Networks personal data that has occurred immediately in any event within 24 hours of awareness.

The notice will contain the summary details of the data breach and contact details for the supplier's data breach lead as soon as possible, even if the exact nature and extent of the breach is still being investigated. We need to know that the breach has occurred as soon as you become aware of it so we can notify the Information Commissioner and subsequently clarify the details that will emerge from investigating the breach. It is essential that the supplier understands that this obligation is within 24 hours irrespective of whether these are working hours.

Anti-bribery and corruption

Metaswitch is committed to doing business ethically and we expect partners to conduct business in an honest and ethical manner with no tolerance for bribery and corruption worldwide. Metaswitch expects partners to have a commitment to acting professionally, fairly and with integrity in all global business dealings. All partners should follow all applicable laws relevant to countering bribery and corruption in the jurisdictions in which both they and Metaswitch operate. Metaswitch is to be notified of any attempts by a supplier to bribe or act in a manner inconsistent with relevant anti-corruption laws.

Management systems**Security**

The management and security of all systems, documents, confidential and proprietary information is critical to our success. Information must not be disclosed, exposed or used outside of the accordance of applicable regulations, laws or contractual requirements. Our partners are responsible to ensure the security and confidentiality of all information they have access to or that which has been shared with them. They should ensure that security controls and robust security processes are in place to any system or information access point and that any information related to Metaswitch and its customers must be treated securely and with care.

Compliance

Metaswitch is committed to having a strong management process designed to ensure ongoing compliance with all laws, regulations and contractual requirements related to all aspects of our business worldwide. Our partners should responsibly comply with the legal requirements and standards everywhere they conduct their business globally as well and ensure they implement robust processes and record maintenance to maintain ongoing compliance.

Other responsibilities**Subcontracting**

Metaswitch expects our partners to deal fairly with the subcontractors in use within their business. Partners should not use subcontractors or any other third party regarding their obligations to Metaswitch without prior written approval by Metaswitch.

Communication

Metaswitch embraces open and honest dialogue and communications with all parties involved with our business. We expect our partners to ensure this code of conduct is available to employees in the business language of the company.