

Principles of Vendor Conduct

To Our Valued Vendors

At Brightstar, we are committed to conducting business with integrity and adherence to all applicable laws and regulations. We are focused on maintaining ethical conduct in the workplace and in our business relationships. Our ethical foundation relies on our employees as well as our valued consultants, contractors, suppliers and third parties that have a contractual relationship to offer products or services to, or on behalf of, Brightstar (collectively, “Vendors”). This is why we have established our Principles of Vendor Conduct.

As a Brightstar Vendor, you are part of our on-going success. However, our continued success – and yours – depends on conducting business in an ethical and professional manner.

In our business dealings, we expect our Vendors to adhere to business principles consistent with our own. As one of our valued Vendors, we ask you and your subcontractors to review and comply with our principles and standards required to conduct business with Brightstar. If you have questions or concerns, please contact your Brightstar representative or account manager. If you become aware of any actual or potential violations of these principles, you may submit a report via our Ethics Helpline at: www.brightstar.ethicspoint.com or via the 24-hour toll free telephone number provided on the website.

We sincerely value our Vendors who have joined us in pursuing these principles and common goals of integrity and ethical business practices and we look forward to continuing a positive relationship with you in the future.

Our Principles of Vendor Conduct

In addition to complying with the provisions of these principles, our Vendors shall comply with all laws applicable to the Vendor and its operations. Where the requirements of such laws and these principles differ, or are in conflict, the Vendor shall comply with the highest standard consistent with applicable laws.

Prohibited Business Activities

- Any and all forms of illegal and unethical activity, such as, but not limited to, bribery, corruption, extortion, kickbacks, collusion, money laundering and fraud, are prohibited.
- Any action that may result in conflicts of interest that could inappropriately influence Brightstar’s business decisions or gain an unfair advantage, is prohibited.

- Inappropriate use of any confidential information, intellectual property rights or personal data, is prohibited.

Trade Compliance

- There shall be compliance with all import, export/re-export, boycott, and sanction restrictions as required by United States and applicable laws and regulations.

Non-Discrimination & Harassment

- There shall be no discrimination against anyone on the basis of race, color, religion, age, gender, sexual orientation, gender identity, disability, citizenship status, veteran status, or any other protected status under applicable laws and regulations.
- There shall be no physical abuse or harassment, including sexual harassment, or any kind of inhumane treatment directed at any employee or contractor.

Labor Rights & Working Conditions

- There shall be adherence to the minimum employment age limits, wage minimums and benefits as defined by applicable laws and regulations.
- There shall not be any acts of slavery or human trafficking or support or dealings with any business knowingly involved in slavery or human trafficking.
- There shall be recognition of the workers’ right to join or refrain from joining associations of their own choosing, including workers’ rights to collectively bargain, unless prohibited by applicable laws; and workers’ rights to open communication and humane and equitable treatment must be respected.

Health & Safety

- All operations shall be carried out in safe and healthy working conditions in compliance with applicable laws and regulations, including compliance with applicable laws and industry standards related to working hours.

Environment

- There shall be compliance with all applicable environmental laws and regulations and all products delivered must not contain metals derived from “conflict minerals” (e.g. tin, tantalum, tungsten and gold, or their derivatives) that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or any adjoining country.

Quality Management

- All products and services shall be delivered in accordance with quality and safety standards as required under applicable laws and regulations.