

**SECURUS**  
Technologies®  
*an aventiv company*

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**aventiv**®

**Supplier Code of Conduct**

At Aventiv, we are mission-driven, and purpose-led. We measure success by the impact we have on the lives of people.

We also value unity, opportunity, and dependability and we conduct business ethically and fairly.

We expect you, our Supplier, to help us deliver on our values and commitments to responsible business conduct at all times. Working together, we can maximize our positive impact and grow together in a sustainable and responsible way.

## Why We Have This Code

Our work at Aventiv is complex. We must balance the unique needs of all of our stakeholders, particularly those of the incarcerated individuals that rely on our products.

This type of business requires us to uphold the highest ethical standards in all of our business dealings and our third parties must do the same.

It is our responsibility to ensure that our Suppliers understand what is expected of them. This Supplier Code of Conduct explains our minimum standards and how to do business the Aventiv way.

## Who This Code Applies To

This Supplier Code of Conduct applies to all companies or individuals providing goods and/or services to Aventiv Technologies, LLC or any of its subsidiaries, including Securus Technologies, LLC, JPay, LLC and AllPaid, Inc.

For the purposes of this Code, the term “Supplier” includes all Aventiv suppliers and vendors.

We can, and will, terminate a relationship with any third-party business partner if we believe they have violated this Code or if we have concerns about their ethical conduct.



**Aventiv chooses to do business with Suppliers who share our values and commitment to conducting business responsibly and ethically.**

## **Our Commitment to Responsible Sourcing**

Our Suppliers play a crucial role in helping us deliver on our commitments, and we want to develop open and supportive two-way relationships that raise standards across the value chain.

Respecting and abiding by the Supplier Code is just the starting point for many Suppliers. By doing business with Aventiv, they agree to live up to our expectations in the field of responsible business conduct, human rights, health and safety, and protecting the environment.

We recognize that we have a duty to support our Suppliers to help improve standards and capabilities. Suppliers are encouraged to contact us in case of any questions about the contents of the Code or if they require further guidance or support to ensure compliance.

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The following standards specify what we expect from our Suppliers and how to do business the Aventiv way.

## **Our Suppliers Have Processes to Promote Ethical Conduct**

We expect our Suppliers to have policies in place to promote compliance with the law and to ensure ethical conduct.

### *Commitment to Non-Retaliation*

Our Suppliers must provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

### *Ethics Policies*

We expect our Suppliers to implement risk-based ethics and compliance measures to help them comply with all applicable laws, regulations, and this Supplier Code. We encourage our suppliers to implement their own written codes of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.

## **Our Suppliers Conduct Business Ethically and Legally**

We expect our Suppliers to share our commitment to doing business ethically and legally. This requires our suppliers to know and follow all laws and regulations that apply to them, whenever and wherever they are doing business. Our Suppliers should focus on doing the right thing and treat legal requirements as a minimum standard of behavior.

### *Bribery and Corruption*

Our Suppliers may never engage in any form of bribery or corruption. Specifically:

- Our Suppliers may never give, offer, or accept bribes or illegal payments in any form, including the giving or receiving of any payments, services, gifts, entertainment, or favors in exchange for an improper business advantage.
- Our Suppliers should actively work to prevent and detect corruption in all of their business relationships.
- Our Suppliers must promptly report any suspected bribery violations to Aventiv.

### *Antitrust and Competition*

Our Suppliers support an open, fair, and competitive business environment and do not improperly exchange competitive information or engage in price fixing, bid rigging, improper market allocation, or other unfair trade practices.

### *Trade Laws*

Our Suppliers comply with all U.S. and foreign laws and regulations governing international trade including import, export, and anti-boycott laws. Additionally, when applicable, Suppliers are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

### *Conflict Minerals*

Our Suppliers must adhere to federal laws and regulations relating to the use of conflict minerals and make all appropriate disclosures. Additionally, we expect our Suppliers to develop due diligence processes, including reasonable country of origin inquiry processes, to allow us to submit accurate conflict mineral reports and to meet our obligations to ensure that all products are responsibly manufactured.

### *Conflicts of Interest*

Our Suppliers and their employees avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Aventiv.

### *Maintaining Accurate Records*

Our Suppliers must conduct business transparently and must record all business and commercial dealings accurately in their books and records.

## **Our Suppliers Respect the Dignity and Human Rights of All**

We expect our Suppliers to share our commitment to doing business with respect for people's fundamental dignity and human rights. Our Suppliers must meet the following minimum standards of behavior.

### *Prohibit Discrimination*

Our Suppliers must provide equal employment opportunities to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

### *Prevent Harassment*

Our Suppliers must provide employees with an employment environment that is free from abusive conduct including physical, psychological, or verbal harassment.

### *Protect Children's Rights*

Our Suppliers must respect the rights of children as stated in the Convention on the Rights of the Child, including the right to education, the right to rest and play, and the right to have basic needs met. Specifically, our suppliers must only hire workers who are above the minimum legal age for employment in the jurisdiction where their work is performed.

### *Prevent Human Trafficking*

Our Suppliers must also prohibit and prevent human trafficking and forced labor. Specifically, our Suppliers must:

- never use or tolerate the use of human trafficking, forced labor, or child labor as defined by the International Labour Organization (ILO);
- address any adverse human rights impacts of their operations;
- educate their employees about prohibited trafficking activities; and
- report any suspected human trafficking violations connected to their work with Aventiv.

### *Recognize the Right to Organize*

Our Suppliers must respect the rights of their employees to organize, bargain collectively, and form a working council. Where local laws and practices restrict the right to freedom of association and collective bargaining, our Suppliers should try to develop other ways to have a meaningful social dialogue with worker representatives, without breaking local law.

### *Promote a Diverse, Equitable, and Inclusive Workplace Environment*

Aventiv is committed to promoting an inclusive workplace environment that unlocks the unique qualities, values, and potential of each employee. We expect our vendors to create an inclusive environment that fosters diverse perspectives and experiences. In addition, we appreciate vendors that actively work to develop and retain a diverse and inclusive workforce and that are committed to diversity with respect to their supplier selection.

## **Our Suppliers Put Health and Safety First**

We expect our Suppliers to share Aventiv's commitment to maintaining a healthy and safe work environment. Our suppliers must meet the following minimum standards of behavior.

### *Working Safely*

Our Suppliers must protect the health and safety of their staff, visitors, and others who may be affected by their activities. Our Suppliers' employees should be competent for the work they are asked to perform, trained appropriately, and empowered to stop unsafe work and report incidents and unsafe work practices.

### *Responding to Emergencies*

Our Suppliers should have and follow emergency procedures regarding responding to health emergencies and accidents.

## **Our Suppliers Protect the Environment**

We expect our Suppliers to share our commitment to using resources wisely and reducing our impact on the environment.

### *Use Resources Efficiently*

Our Suppliers should work to use resources more efficiently, including by reducing energy, water, and fuel use. Where possible, our Suppliers should follow waste mitigation plans including supporting recycling and reuse programs.

## **Our Suppliers Protect Aventiv's Information, Assets, and Interests**

We expect our Suppliers to protect Aventiv's reputation and any information or property we share with them.

### *Confidential and Proprietary Information*

Our Suppliers must properly handle sensitive information, including confidential, proprietary, and personal information. This includes knowing and understanding all applicable rules and regulations and not using information for any purpose other than the business purpose for which it was provided unless there is prior authorization from the owner of the information.

### *Intellectual Property*

Our Suppliers must respect the intellectual property rights of others, including protections against disclosure, patents, copyrights, and trademarks.

### *Information Security*

Our Suppliers must protect the personal, confidential, and proprietary information of others by using appropriate physical and electronic security procedures. Our Suppliers must comply with all applicable data privacy laws and all applicable rules and regulations regarding safeguarding vendor and supplier information systems.

### *Insider Trading*

Our Suppliers must not use material, non-publicly disclosed information obtained in the course of their business relationship with us as the basis for trading or for enabling others to trade in the securities of any company.

### *Protecting Aventiv's Reputation*

Our Suppliers must conduct themselves in a manner that reflects positively on Aventiv and its clients. This includes:

- not publicly disparaging or misrepresenting Aventiv's or our clients' images or brands in a way that is damaging to our or our clients' reputations;
  - not using Aventiv's name, influence, funds, or other assets in their outside business activities; or
  - not speaking to the press or media on behalf of Aventiv. Any media inquiries should be directed to [press@aventiv.com](mailto:press@aventiv.com).
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## How To Raise a Concern

Suppliers must promptly report violations of this Code and are encouraged to contact any of the following resources at any time:

- Aventiv's Human Resources Department: [hrteam@aventiv.com](mailto:hrteam@aventiv.com)
- Aventiv's Ethics & Compliance Office Mailbox: [Ethics&ComplianceOffice@aventiv.com](mailto:Ethics&ComplianceOffice@aventiv.com)
- Aventiv's Ethics Helpline: [lamAventiv.Aventiv.com](https://www.lamAventiv.Aventiv.com) or 844.893.8986
  - Aventiv's helpline is operated by an independent company (OneTrust, formerly Convercent) and is available 24/7. [lamAventiv.Aventiv.com](https://www.lamAventiv.Aventiv.com) gives you the option to be anonymous as permitted by law.