

# Business Partner Code of Conduct





Juniper Network's identity and success is built on a foundation of integrity, honesty, and ethical conduct. This foundation depends on our alignment on these values with business partners who share a strong commitment to ethical business practices.

This Business Partner Code of Conduct (the "Code") articulates a shared vision and set of expectations for Juniper and our business partners. By this Code, Juniper expresses its support for the Code of Conduct established by the Responsible Business Alliance (RBA) and the Ten Principles of the United Nations Global Compact.

### Applicability

The Code applies to all Juniper business partners including, but not limited to, distributors, resellers, service providers or other vendors, or service, alliance or education partners. It is applicable to the partner entity and their personnel in all activities related to Juniper's business relationship globally. The English-language version of this Code shall govern.

### Relationship of the Parties

Juniper and their business partners are independent contractors and neither party shall be considered the agent of the other party for any purpose whatsoever. Nothing in this Business Partner Code of Conduct shall be construed as establishing a partnership or joint venture between the parties.

### Certification

Where required, each business partner covered by the Business Partner Code of Conduct shall have an authorized representative certify that they have read and understood the Code and that the Juniper business partner and its personnel are committed to complying with the principles of these standards.



## Integrity and Compliance with Laws

### Anti-Bribery Compliance

Juniper is committed to conducting its business free from extortion, bribery, and all unlawful, unethical or fraudulent activity.

- Juniper business partners must not, directly or indirectly, make, offer or authorize the payment of any money, gift, bribe, kickback or anything of value to any customer, any government official or government employee, any Juniper employee or any other person to improperly influence any action or decision.
- Juniper business partners shall use any Juniper assets or funds paid to or entrusted with them (such as non-standard discount, rebates or MDF) only for the specific purpose authorized or intended.
- Juniper business partners must comply with all applicable local and international anti-bribery laws.

### Financial Integrity and Accounting

Juniper business partners shall keep complete and accurate books and records regarding sales of Juniper products and any and all transactions or other expenditures with respect to any Juniper-related business. Juniper business partners must not engage in false and/or misleading accounting practices, including but not limited to creating “slush funds” or other improper financial practices.

### Honest and Accurate Dealings

Juniper business partners must not make any false representations in connection with any Juniper transactions, including, but not limited to, oral misrepresentations of fact, the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, or other false or inaccurate records.

### Fair Competition

Juniper’s business partners must not:

- agree with other partners or companies to coordinate or fix prices,
- agree with other companies to boycott suppliers or customers,
- agree with other companies to divide or allocate markets or customers, or
- propose or enter into an agreement or understanding restricting resale price of Juniper products.

### Conflicts of Interest

Juniper business partners must not engage in any activity that may involve an inappropriate conflict or the appearance of a conflict with their contractual responsibilities owed to Juniper. Juniper business partners must not offer or provide excessive gifts, hospitality or entertainment to any Juniper employee or their family members. Juniper business partners acknowledge that Juniper employees and their family members may not hold any significant economic interest in any entity that does business with Juniper, and Juniper business partners shall avoid such relationships with Juniper employees.



## Insider Trading and Improper Commercial Advantage

Juniper business partners shall ensure that non-public information entrusted to them by Juniper in the course of their relationship with Juniper is not used for the personal benefit of the partner, their employees or other persons.

## Protection of Confidential Information

Juniper business partners shall protect confidential and any other proprietary information that is obtained in the course of the business relationship with Juniper or joint customers. Juniper business partners must not misuse this information for their own purposes or disclose such information to unauthorized third parties. Juniper business partners shall observe applicable data privacy and information security requirements when handling Juniper or joint customer information.

## Intellectual Property

Juniper business partners must not infringe Juniper's trademarks and other intellectual property rights. Juniper business partners must not infringe on the intellectual property rights of joint customers or other third parties in any manner relevant to their relationship with Juniper.

## Government Sector Sales

In addition to the Anti-Bribery Compliance requirements outlined above, certain additional restrictions may apply to Juniper business partners engaged directly or indirectly in government sector sales. Juniper business partners shall observe all laws, regulations and contract clauses that relate to sales to government entities.

## Export Compliance

Juniper business partners are expected to have and follow a documented export control program designed to assure compliance with U.S. and all other applicable export and import laws and regulations when handling or distributing export controlled materials or product. Juniper product and services often contains sensitive technology that is highly regulated and may only be distributed to authorized end users and always in compliance with any trade embargoes and sanctions. For questions regarding export compliance, contact [trade compliance@juniper.net](mailto:trade compliance@juniper.net).

## Responsible Business Partner Conduct

Juniper business partner personnel shall conduct themselves in a professional manner while representing Juniper products and services in the marketplace. This means treating all persons with dignity and respect in a business-like manner while marketing, selling or supporting Juniper products and services.

## Responsible Sourcing of Minerals

Juniper business partners are expected to comply with any affirmative obligations imposed by law to reasonably assure business partners that tantalum, tin, tungsten and gold that may be contained in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights offenses in conflict-affected and high-risk regions, such as the Democratic Republic of Congo or an adjoining country. Juniper business partners are expected to exercise due diligence on the ethical source and chain of custody of these minerals and make their due diligence measures available to Juniper upon request.





## Labor Standards

Juniper business partners are expected to treat their employees fairly and in accordance with applicable laws and regulations regarding labor and employment and to pursue the following principles.

### Freely Chosen Employment

Employment with Juniper business partners must be an expression of free choice and there should be no forced, bonded or involuntary labor, or slavery or trafficking of persons. Juniper business partners should allow workers to discontinue employment upon reasonable notice. Juniper business partners should not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such actions are required by law.

### Child Labor Avoidance and Working Hours

Juniper business partners must not use child labor and Juniper business partners are expected to adopt procedures to verify and maintain documentation that no child labor is used. Juniper business partners must follow all applicable local laws, regulations and standards concerning working hours, conditions and wage rate for all workers. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety.

### Lawful Employment

Juniper business partners must, prior to employing any worker, validate and review all relevant documentation to ensure that such worker has the legal right to work in that jurisdiction.

## Non-Discrimination

Juniper business partners must not unlawfully discriminate on the basis of race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, veteran status, or marital status.

### Freedom of Association

Juniper business partners must respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions. Juniper business partners have the right to establish favorable employment conditions and to maintain effective employee communication programs as a means of promoting positive employee relations that make employees view third-party representation as unnecessary.

### Safe Conditions

Juniper business partners must provide a safe and hygienic working environment for workers and are expected to provide appropriate safety equipment and training.

### Wage and Benefits

Juniper business partners must provide wages, benefits and overtime pay required by all local wage and hour laws and regulations including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.



## Environmental Standards

Juniper business partners must comply with all applicable laws and regulations relating to the impact of their business on the environment. Compliance with environmental law includes any international or applicable local laws affecting the source of materials and processes used to manufacture or deliver products and services.

## Pollution Prevention and Resource Conservation

Juniper business partners are expected to take steps to ensure conservation of resources and reduction of waste generation of all types, including water, energy, and air emissions, by elimination or reduction at the source or by practices such as recycling and re-using materials, materials substitution and modification of processes. Juniper business partners are expected to avoid undue and unnecessary use of packaging materials and utilize recycled materials whenever appropriate.

## Hazardous Substances

Juniper business partners are expected to adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances in products and manufacturing. Chemicals and other materials posing a hazard if released to the environment should be identified and managed to ensure their safe handling, movement, storage, use and disposal.

## Energy Consumption

Juniper business partners are expected to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

## Monitoring and Compliance

Juniper may audit or request information to confirm compliance with this Code or appoint a third party to conduct an audit. Any violations will be reported to the Juniper business partner's management for their attention and, if appropriate, corrective action will be taken. It is the intention of Juniper to terminate its relationship with any business partner who does not comply with this Code or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance.

*Juniper business partners and other stakeholders may report suspected violations (confidentially and anonymously when allowed by law) to the Juniper Integrity and Compliance Group directly by emailing [integrity@juniper.net](mailto:integrity@juniper.net), or by calling the Juniper Integrity Helpline at 1-855-410-5445 (U.S. Toll Free), or reporting online at [integrity.juniper.net](https://integrity.juniper.net).*



