

Poly Business Partner Code of Conduct

Plantronics, Inc. and all of its subsidiaries and affiliates worldwide (collectively, “Poly”) is committed to conducting business with integrity and in an ethical, legal and responsible manner. Poly expects its business partners to share this commitment. More specifically, Poly expects its business partners to:

1. **Comply with Applicable Laws.** Comply with all applicable laws, regulation and codes of the countries, states and localities in which they operate, or which are applicable to them because of their business relationship with Poly. This includes laws and regulations related to labor and environmental practices, anti-corruption and anti-bribery, and import/export control.
2. **Abide by the Standards Established in Poly’s Code of Conduct.** Poly’s standards of business conduct as embodied in Poly’s Code of Conduct require honesty, accountability, integrity, and fairness in all business dealings. Poly expects its business partners to adhere to the standards set out in Poly’s [Code of Conduct](#) when doing work for, or on behalf of, Poly.
3. **Comply with Laws and Standards Related to Labor and Human Rights.** Poly expects its business partners to comply with local minimum and overtime wage and hour laws, and with minimum working age requirements. Workers should be treated humanely and with respect and should not be subject to threats of violence, sexual harassment, abuse or discrimination, or forced labor of any kind. Poly is committed to a workforce free of harassment and unlawful discrimination and expects its business partners to adhere to these same standards.
4. **Comply with Anti-Corruption and Anti-Bribery Laws.** Poly’s business partners must comply with applicable laws and regulations related to anticorruption, antibribery, and anti-money laundering, including by observing the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act (“FCPA”) and the U.K. Bribery Act of 2010. This means that Poly business partners are never authorized to offer, promise, or give, whether directly or indirectly, anything of value (including travel, gifts, money or other business courtesies) to anyone for the purpose of obtaining or retaining business, influencing any actions or decision-making, or to secure any improper advantage. The prohibition on bribery and kickbacks extends to dealings with all individuals and entities, including government officials, candidates for public office, political parties, state-owned entities, employees of state-owned or state-controlled entities, employees of other companies, and Poly employees.
5. **Comply with Antitrust and Fair Competition Laws.** Poly business partners are expected to understand and comply with all applicable antitrust and fair competition laws, including those related to marketing and advertising. This means that Poly business partners must not engage in collusive bidding, bid rigging, price fixing, price

discrimination, or other unfair trade practices. Similarly, Poly business partners should not share pricing information, allocate markets, or allocate customers with their competitors.

6. **Comply with Trade Laws.** Poly, and its products and services, are subject to United States customs, anti-terrorism, and export control laws and regulations. Poly expects its business partners to comply with those laws and regulations, including the provisions of the U.S. Export Administration Regulations and other U.S. economic sanctions programs concerning certain countries and individuals administered by the United States Treasury Office of Foreign Assets Control, with respect to its work with Poly or related to Poly products and services. Poly expects its business partners not to engage in or support terrorist activities, whether directly or indirectly. Poly business partners should comply with all applicable laws or regulations relating to customs, importation, export control and foreign trade in countries in which they do business.
7. **Refrain from Trading Poly Securities When in Possession of Material Non-Public Information.** Poly's business partners may come into possession of material, nonpublic information about Poly or another company (including Poly's customers or other business partners). Poly's business partners may not buy or sell Poly securities or the securities of such other company while in possession of such material, nonpublic information and should not engage in any other action to take improper advantage of such material nonpublic information.
8. **Report Compliance Concerns.** Poly offers a free, online reporting website that is available to its employees, the employees of its business partners, and the general public to report suspected violations or other concerns. The website can be found at: <https://secure.ethicspoint.com/domain/media/en/gui/2687/index.html>. Reports also may be made by telephone (in the United States at 1-800-499-8621; local phone numbers for other countries are listed on the website). This service allows Poly employees, and the employees of its business partners, to raise concerns or make reports confidentially and anonymously of known or suspected violations or misconduct relating to Poly, its business, and its products and services.

Poly expects its business partners to inform their employees who perform services with, for, or on behalf of Poly, or in connection with Poly's products and services, that they can make a report, including anonymously if desired, via Poly's reporting website. Poly will not tolerate retaliation, harassment, or discrimination against anyone for making such a report in good faith and expects its business partners to take steps to prevent retaliation, harassment, or discrimination against such individuals.

9. **Keep Accurate and Complete Books and Records.** Poly expects its business partners to timely and accurately record and, as required, report all business transactions and information related to their work for Poly. Business partners may not alter any record to conceal or misrepresent the underlying transaction represented by it. All records made in connection with Poly business must fully and accurately represent the transaction or event being documented. Records related to Poly business must be created, retained,

reported, and disposed of in compliance with all applicable legal and regulatory requirements, and any additional requirements imposed by Poly.

10. **Understand That Non-Compliance Can Lead to Suspension or Termination.** Based on the assessment of information made available to Poly, Poly reserves the right (in addition to all other legal and contractual rights) to disqualify any potential business partner or terminate any existing business relationship with any business partner found to be in violation of this Policy, the standards set out in the Poly Code of Conduct, or any applicable law or regulation, without liability to Poly. Failure to comply with the policies, procedures or other requirements of this Policy or of any applicable law or regulation may, in Poly' sole discretion, constitute cause for termination of any agreement by and between Poly and the business partner on terms to be determined by Poly.