

## CAMBIUM NETWORKS

### SUPPLIER CODE OF CONDUCT

Cambium Networks depends on product quality and superiority, combined with outstanding support capability, to sell its products and to support the value of its brand. Cambium Networks will not do business with any entity or person engaged in unlawful or unethical business practices. Accordingly, our suppliers, vendors, contractors, consultants and other third parties (our “Suppliers”) must agree to conduct business with the highest ethical standards and to abide by the requirements set forth in this Supplier Code of Conduct. We expect our Suppliers to avoid any relationship with another entity or person, or engage in any activity, that results or may result in noncompliance with applicable laws or with this Code of Conduct, that creates a conflict of interest with us or the products supplied to us, or that may result in embarrassment to Cambium Networks, or harm to our reputation and brand. If a Supplier fails to comply in any respect with any of the requirements set forth in this Supplier Code of Conduct, Cambium Networks may immediately and without liability terminate our relationship with such Supplier. By accepting a purchase order from Cambium Networks, Suppliers acknowledge acceptance of this Supplier Code of Conduct.

#### 1. Ethical Business Practices

Cambium Networks expects its Suppliers to uphold the highest standard of ethics, including:

a. **Business integrity.** The highest standards of integrity are to be upheld in all business interactions. Cambium Networks has a zero-tolerance policy prohibiting any and all forms of bribery, corruption, extortion and embezzlement.

b. **Compliance:** Suppliers will comply with all applicable laws in their business conduct and shall maintain compliance systems that enable the Supplier to demonstrate a satisfactory record of compliance. Standards of fair business, advertising and competition are to be upheld.

c. **Anti-corruption:** Suppliers will conduct their business without engaging in corrupt practices, including public or private bribery or kickbacks, corruption, extortion or embezzlement. Suppliers will maintain integrity, transparency and accuracy in corporate record keeping. Suppliers must never, even through third parties, accept or offer bribes or kickbacks to obtain or gain an unfair business advantage. This prohibition includes promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers must be in full compliance with all applicable foreign and domestic anticorruption laws including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

d. **No unfair business practices:** Suppliers will act with integrity and lawfully in the handling of competitive data, proprietary information and other intellectual property, and comply with all applicable legal requirements regarding advertising, fair competition, antitrust, and accurate and truthful marketing. All business dealings should be transparently performed and accurately reflected on Supplier’s business books and records. We require our Suppliers to abide by all fair competition and antitrust laws applicable in their country of operation.

e. **Intellectual property:** Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights and Cambium Networks and Supplier information is to be safeguarded.

f. **Conflicts of interest.** Suppliers will avoid potential or actual conflicts of interest in their business dealings with Cambium Networks. Suppliers shall not engage in activities or transactions that would or could improperly benefit or appear to improperly benefit any Cambium Networks employee. Supplier shall notify Cambium Networks if any actual or potential conflicts of interest arise relating to the services provided to Cambium Networks.

g. **Privacy.** Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

h. **Protection of identity and non-retaliation.** Suppliers shall ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are maintained, unless prohibited by law. Suppliers shall have a communication process for their personnel to be able to raise any concerns without fear of retaliation.

## 2. **Labor and Employment**

Cambium Networks is committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the international community, including temporary, migrant, student, contract, direct employees and any other type of worker.

a. **Freely chosen employment:** Suppliers will not use forced, bonded or indentured labour, including debt bondage, and slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters. Workers shall be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Suppliers will ensure that terms of employment are voluntary and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. If a Supplier retains contract or migrant workers, Supplier will pay any applicable agency recruitment fees and will ensure there are no unreasonable employment or relocation expenses. Supplier will not require any worker to remain in employment for any period of time against his or her will or adopt practices that restrict worker's ability to terminate employment. Workers will not be required to lodge "deposits" or hand over government-issued identification, passports or work permits as a condition of employment, unless required by law.

b. **Anti-discrimination:** Suppliers should be committed to a workforce free of harassment and unlawful discrimination and shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity or national origin, disability, religion, political affiliation, union membership, covered veteran status, or marital status in hiring and employment practices such as wages, promotions, and access to training. Supplier will employ workers on the basis of their ability to do the job, rather than on the basis of their personal characteristics, conditions or beliefs. Suppliers shall comply with all applicable laws or regulations relating to equal opportunity or affirmative action.

c. **No child labour:** Supplier will ensure that its hiring practices are in conformance with International Labour Organization (ILO) Conventions for minimum age (Convention 138) and child labour (Convention 182). Supplier is encouraged to develop lawful workplace apprenticeship programs for the educational benefit of their workers, provided that all participants meet the minimum age requirements and legitimate workplace learning programs, which comply with all laws and regulations, is supported by Cambium Networks. Workers under the age of 18 should not perform hazardous work and should be restricted from night work if it interferes with educational needs.

d. **No harsh or inhumane treatment:** Supplier will prohibit the physical abuse and harassment of employees, as well as the threat of either, and there is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, including bullying or public shaming.

e. **Fair working hours:** While it is understood that overtime may be required, Supplier will manage operations in compliance with the applicable law and ensure that overtime does not exceed levels that create inhumane working conditions. Supplier will not require, on a regularly scheduled basis, work in excess of 60 hours per week or in excess of six consecutive days without a rest day, except in emergency or unusual situations. All overtime must be voluntary.

f. **Wages and benefits:** Wages and benefits paid will meet, at a minimum, all applicable legal requirements, including those relating to minimum wages, overtime hours and legally mandated benefits. For each pay period, Supplier will provide workers with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Supplier will not permit deductions from wages as a disciplinary measure. All temporary, dispatch and outsourced labor will be within the limits of local law.

g. **Freedom of association and collective bargaining:** In conformance with local law, Suppliers shall respect the right of workers to join or to refrain from joining associations, including trade unions, of their own choosing and the right to collective bargaining and engaging in peaceful assembly, unless otherwise prohibited by law, without fear of discrimination, reprisal, intimidation or harassment. In all cases, worker rights to open communication, direct engagement, and humane and equitable treatment must be respected, without fear of discrimination, reprisal, intimidation or harassment.

h. **Safe and healthy working conditions:** Supplier will operate a safe and healthy work environment. If Supplier provides housing or eating facilities, Supplier will operate and maintain them in a safe, sanitary and dignified manner. Worker potential for exposure to safety hazards (e.g. chemical, electrical and other energy sources, fire and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and ongoing safety training. Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures.

i. **Supplier Diversity:** If requested by Cambium Networks, Supplier shall track and report its and its supply chain's spend with minority-owned, women-owned and disabled veteran-owned business enterprises located in the United States and submit regular progress reports to Cambium Networks in a format designated by Cambium Networks.

### 3. Health and Safety

a. **Occupational Safety.** Suppliers shall identify, assess and mitigate exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, among others). Supplier shall aim to mitigate hazards, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventive maintenance and safe work procedures. Supplier shall provide its workers with ongoing occupational health and safety training. Workers shall be provided with appropriate, well-maintained, personal protective equipment as required.

b. **Emergency preparedness.** Suppliers shall identify and assess emergency situations and events, and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills. Emergency plans should include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities and recovery plans.

c. **Occupational injury and illness.** Suppliers shall implement procedures to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes and facilitate the return of workers to work.

d. **Industrial hygiene.** Suppliers shall identify, evaluate and control worker exposure to chemical, biological and physical agents. If any potential hazards are identified, Suppliers shall look for opportunities to eliminate or reduce the potential hazard. When hazards cannot be controlled through proper design, engineering, or administrative controls, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge.

e. **Sanitation, food and housing.** Suppliers shall supply their workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities. Any dormitories provided to workers by Suppliers shall be maintained clean and safe, and provided with appropriate egress, hot water, adequate lighting and heat and ventilation.

### 4. Environmental

Cambium recognizes that environmental responsibility is integral to producing world class products and we expect our Suppliers, in manufacturing operations, to minimize adverse effects on the community, environment and natural resources.

a. **Environmental compliance:** Environmental Management System: Suppliers of goods will have an Environmental Management System (EMS) in accordance with ISO 14001 or equivalent. The EMS must be implemented and functioning. Third-party registration is strongly recommended but not required. All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

b. **Environmentally preferred products:** Cambium Networks values environmentally preferred products. We work with and encourage our Suppliers to create products that are energy efficient, highly recyclable and contain significant amounts of recycled materials and low amounts of hazardous materials. To enable us to evaluate Supplier's components and products for environmental

performance, Supplier must provide material disclosures. Suppliers must adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

c. **Ozone-depleting substances:** It is Cambium Networks' policy to eliminate from Cambium Networks products any components — including components provided by our Suppliers — that contain or that are manufactured with a process that uses any Class I ozone-depleting substance. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required by applicable law or regulation prior to discharge.

Suppliers shall on request provide certification that products supplied to Cambium Networks, do not contain or are not manufactured with a process that uses any Class I ozone-depleting chemicals.

d. **Hazardous substances:** Supplier must comply with all applicable laws, rules and regulations in its supply of products or services to Cambium Networks relating to chemicals, toxic substances and other materials posing a hazard to humans or the environment, including those relating to identification, labelling, and management to ensure their safe handling, movement, storage, use, recycling or reuse or disposal, including WEEE, RoHS and similar regulations.

e. **Management systems.** Supplier shall adopt or establish a management system that supports the content of this code. The management system will be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to Supplier's operations and products; (b) conformance with this code; and (c) identification and mitigation of operational risks related to the areas covered by this code. The management system should also drive continual improvement.

f. **Conflict minerals.** The mining and processing of raw materials is an integral stage in Cambium Networks' global supply chain. Cambium Networks and its customers strongly discourage and seek to avoid the sourcing of raw materials (including tantalum, tin, tungsten and gold) from areas where proceeds from the sale of raw materials fund social unrest and political repression, violence, or conflict ("Conflict Minerals"). Cambium Networks is required to report to the U.S. Securities and Exchange Commission on our use of Conflict Minerals. We expect our Suppliers to support our efforts to conduct due diligence on the use of Conflict Minerals in our supply chain. Suppliers shall exercise due diligence on the source and chain of custody of these Conflict Minerals and make their due diligence measures and the results of due diligence available to Cambium Networks upon our request, utilizing a format approved by Cambium Networks. We expect our Suppliers to comply with our Conflict Minerals policy.

g. **Certifications.** If Cambium Networks requests additional certifications, such as ISO 50001, 14001 or OHSAS 18001, Suppliers will make good faith efforts to obtain such certifications in a timely manner

## 5. Imports, Exports and Customs

Suppliers shall comply with all applicable import and customs laws, regulations and administrative determinations governing the import and export of domestic and foreign origin parts and components and related technical data. If Supplier is the exporter of record for any shipments, Supplier shall obtain all export authorizations from the applicable government agency that may be required to lawfully make

such shipments. Supplier shall comply with any applicable governmental security criteria in its import and export activities.

**6. Books and Records.**

The Supplier must maintain up-to-date books and records, including financial records, to demonstrate compliance with this Supplier Code of Conduct and any applicable laws and regulations. Upon Cambium Networks' request, these records must be made available to Cambium Networks.

**7. Confidentiality/Privacy**

In order to conduct day-to-day business with Cambium Networks, the Supplier may need access to confidential/private records. The Supplier must ensure this information is protected and remains confidential. Suppliers do not disclose this information unless given written permission from Cambium Networks. Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with and to comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

**8. On-Site Work**

Suppliers using our properties or facilities will comply with all of our applicable policies and requirements.