

January 2016

## Equal Employment Opportunity/Affirmative Action Policy

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### POLICY SCOPE

This policy applies to all 100% owned or controlled subsidiaries of Verizon Communications Inc. This policy applies to all locations where employees work or represent Verizon, including the workplace, customer and vendor premises, and company-sponsored activities.

### POLICY STATEMENT

policy is to provide equal employment opportunity ("EEO") to all persons without regard to *race, color, religion, age, gender, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status, military status or any other legally protected classifications*. Verizon does not discriminate on the basis of any protected classification listed above, or other categories protected under federal, state or local law.

Verizon is committed to a workplace free from unlawful discrimination and harassment and will not tolerate discriminatory or harassing behavior of any kind. This commitment extends beyond that which may be required by law and strives to maintain a work environment totally free from discrimination or harassment. This zero tolerance policy applies to any conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment.

Prohibited harassment includes verbal, physical or other behavior that denigrates or shows hostility or aversion toward an individual because of that person's *protected classification* (above). Such harassment, and the discriminatory treatment of others based on their protected classification, is unacceptable regardless whether it is instigated by employees or non-employees, including contractors, interns, customers, vendors, suppliers and visitors.

It is also the policy of Verizon to take appropriate Affirmative Action to assure equal opportunity for all applicants and employees. Verizon invites all employees to voluntarily self identify on the basis of race, gender, veteran status or disability.

Verizon will make reasonable accommodations for the physical/mental impairments of employees or applicants if doing so will enable the employee or applicant to perform the essential functions of a position that he/she holds or is seeking, so long as the accommodation would not cause an undue hardship to the business.

It is also the policy of Verizon to reasonably accommodate an employee's or an applicant's religious beliefs, practices and observances, unless doing so results in undue hardship to the Company. However, employees may not impose their religious beliefs on other employees, customers, business suppliers or other stakeholders.

### Protection from Retaliation

Verizon prohibits any form of retaliation against applicants or employees for filing a complaint, reporting alleged violations or for cooperating in a Company or government investigation. Committing any act of retaliation alone can be cause for appropriate corrective action, including termination of employment.

### RESPONSIBILITY - EEO

All employees are expected to adhere to this policy in their day-to-day working relationships and in carrying out their job responsibilities. Violations of this policy will result in appropriate corrective action. This can include termination of employment for severe violations, even for a first offense. Severe violations may include, but are not limited to, use of offensive racial or ethnic slurs or other abusive or offensive language, or unwanted and inappropriate touching of a sexual nature.

Supervisors/Managers are responsible for ensuring compliance with this policy and for providing a work environment free from any form of discrimination or harassment. Management is also responsible for ensuring that all employees

under their supervision are fully aware of this policy and appropriate complaint procedures (below). Managers who have knowledge of conduct that violates Company policy and fail to take the proper corrective action steps, or who otherwise condone such conduct, will themselves be subject to corrective action up to and including termination of employment. Supervisors/local management must notify Human Resources whenever they become aware of any unlawful discrimination or harassment matters. Human Resources is responsible for consulting with local supervision, conducting an investigation, where appropriate, and recommending corrective action when warranted.

### **RESPONSIBILITY - Affirmative Action**

The Director of HR Compliance has overall responsibility for implementing and measuring the effectiveness of Verizon's Affirmative Action Program. Human Resources is responsible for the coordination and facilitation of this Program with Verizon managers and supervisors. Questions regarding the administration of this Program should be referred to Human Resources. As required by applicable law, the Company's Affirmative Action Program for covered veterans and individuals with disabilities is available for review during regular business hours upon request to Human Resources through the VZ Compliance Guideline at 844-894-8433 or online at [www.verizonguideline.com](http://www.verizonguideline.com) for Verizon employees/applicants. Any inquiries, contacts or documents received from the U.S. Department of Labor's Office of Federal Contract Compliance Programs ("OFCCP") must be immediately referred to Human Resources.

### **RESPONSIBILITY - Accommodations**

Employees or applicants are responsible for informing their management team or Human Resources of the need for accommodation. If you need accommodation for a disability in order to perform the essential functions of your position, contact your supervisor and your local Human Resources department for assistance. The Human Resources department will work with you to determine potential reasonable accommodations if doing so will enable you to perform the essential functions of your position, unless doing so would result in an undue hardship on the Company. Business necessity, operational considerations, work rules and co-worker impact may be considered in determining the nature of any accommodation to be made. Employees and applicants should not be placed in positions where, with or without reasonable accommodation, there would exist a direct threat to the safety or health of themselves or others.

### **COMPLAINT PROCEDURE**

An individual who believes he/she has been subjected to, or is aware of, unlawful discrimination, harassment or retaliation should immediately bring their concerns to:

- His/her supervisor or manager;
- Local Human Resources Department; or
- The VZ Compliance Guideline at 844-894-8433 or online at [www.verizonguideline.com](http://www.verizonguideline.com) for Verizon employees/applicants

Complaints will be treated in a confidential manner and information will only be shared on a need-to-know basis. All complaints will be properly investigated. Any unlawful acts of discrimination, harassment or retaliation will be addressed and remedied in an appropriate manner up to and including termination of employment.

Complaints received from an external governmental agency must be immediately submitted to the appropriate Human Resources group for proper handling and response.



**Lowell McAdam**  
Chairman and Chief Executive Officer

#### **Disclaimer Statement**

This policy is not a contract of employment or a legal document between you and the Verizon company that employs you, or Verizon Communications Inc. or any of its subsidiaries. Thus, it must not be construed as a guarantee of employment or a promise regarding the terms and conditions of employment, either express or implied.

This policy may be changed by the Company at any time without notice. Employment with Verizon is "at will," which means that you or Verizon may terminate your employment, at any time, with or without cause, with or without notice, for any reason not prohibited by law, unless governed by a collective bargaining agreement or specific contract of employment. This at will employment relationship may not be modified except in a written agreement signed by the employee and an authorized representative of Verizon.

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## Confidential Reporting and No Retaliation

Reports and complaints will be kept confidential to the extent permitted by law and by the company's need to investigate the situation.

Verizon prohibits retaliation against employees who submit or participate in the investigation of any complaints. If you believe you or others are the subject of retaliation for reporting suspected misconduct or participating in an investigation, you must report the matter to the VZ Compliance Guideline or the Legal Department.

## Cooperation with Investigations

You must cooperate completely in any investigation relating to Verizon. You must be honest and forthcoming at all times during an investigation, and you must provide any investigator with full, accurate, timely and truthful information. Misrepresenting facts or failing to disclose facts during an investigation is strictly prohibited. You may never interfere with or obstruct an investigation conducted by the company, by any third party on the company's behalf or any government agency.

If a police officer, other law enforcement personnel or government employee from any agency (except for environmental, health and safety agencies which are addressed in Section 1.4 of the Code) requests access to company premises or to company or customer information, you must immediately notify the Legal Department for appropriate guidance. Any documents, information or testimony you provide in response to a request by a government agency must be full, fair, accurate and timely, and reviewed in advance by the Legal Department. If you discover or suspect any misrepresentation, misstatement, misunderstanding, omission or other mistake by yourself or another employee, you must immediately disclose it to the Legal Department so that the company can take prompt steps to remedy the situation. The requirements of this subsection do not apply to providing information or testimony, in your individual capacity, to a governmental body or agency on behalf of yourself or co-workers where protected by applicable law.

A Quick Reference Chart with all the important contact information appears at the end of this Code.

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You must adhere to the Code of Conduct and fully cooperate with all investigations relating to Verizon.

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Verizon will not tolerate retaliation against employees who report suspected misconduct or provide information as part of an investigation.

<sup>1</sup> You are required to comply with this Code as a condition of continued employment. This Code does not give you rights of any kind, and may be changed by the company at any time without notice to you. Employment with Verizon is "at will," which means that you or Verizon may terminate your employment, at any time, with or without cause, with or without notice, for any reason not prohibited by law, unless governed by a collective bargaining agreement or specific contract of employment. This at will employment relationship may not be modified except in a written agreement signed by an authorized Verizon officer. This Code sets forth policies and practices applicable to all Verizon employees, except those employees of Verizon Wireless who are employed in union represented bargaining units in existence as of April 2015 and are covered by a separate Code.