

The Business Ethics Advice Line

NORTEL

AT NORTHERN TELECOM (NORTEL), we recognize the importance of credibility, integrity and trustworthiness to our success as a business. We are committed to upholding high ethical standards in all our operations, everywhere in the world.

Living up to this commitment is not always an easy task for a large corporation working globally in today's complex world. Nortel depends on the honesty and judgement of every individual who does business in the company's name.

Code of Ba

THE STANDARDS AND EXPECTATIONS

outlined in Nortel's Code of Business Conduct are intended as a guide to making the right choice. But they can't anticipate nor adequately deal with all the dilemmas you may face.

ESN 333 3014 905 452 3014 1800 683 3503

Where to Go

your most immediate resource is your manager. There may be times, however, when you want confidential advice about a business ethics dilemma you're facing. You may want more information than

your manager can give you. Or you may want to report an ethical concern and you don't feel comfortable going to your manager.

WHEN INDIVIDUALS

CHOOSE to disregard the Code, we all could suffer from damage to the corporate reputation and the ensuing loss of customers, community and employee goodwill, and profitability. You have a personal responsibility to:

- ask questions when you
 have doubts about the ethical
 implications of a situation or
 proposed course of action;
- report any concerns about business practices within the company.

WHEN YOU

the Business Ethics Advice Line, this is what you can expect:

- Your right to remain anonymous will be respected, although you are encouraged to identify yourself.
- Your concern or question will be taken seriously. If you're reporting a concern, you will protected from retaliation.
- You will reach an agreement with the Business Ethics function as to the steps that will be taken to address your concern. Legal, Corporate Security and Human Resources will become involved in the process as appropriate. It is the company's policy that Human Resources be involved in any suspected case of sexual harassment. If your concern involves a suspected illegal action, the Business Ethics function is obliged to consult with Legal and Corporate Security.
- Your request for information or action will be handled promptly, discreetly and professionally. Discussions and inquiries will be kept in strict confidence to the extent appropriate or permitted by policy or law.
- If you wish, you will be informed of any follow-up action initiated by the Business Ethics function.



"ACTING WITH INTEGRITY

BUILDS CREDIBILITY •••

THAT FRAGILE, INTANGIBLE

ASSET THAT'S SO HARD TO

GAIN, SO EASY TO LOSE, AND

SO DIFFICULT TO REGAIN."

Business Ethics

Can Provide Advice Related To:

Conflict of Interest Situations

Gifts and Gratuities

Bribes and Kickbacks

Protection of Company Property

Investment Rules and Insider Trading

Fairness and Honesty with Suppliers

Gathering of Competitive Intelligence
Discrimination and Harassment

Global Corporate Citizenship

And Other Work-Related Ethical Issues

The Business Ethics Advice Line
ESN 333 3014
905 452 3014

1800 683 3503 (Within North America)

(No caller name or number displayed on these lines)

Other Sources of Advice

Environment & Ethics Regional Resource

For a current list of Regional Resource councer numbers as well as an interactive version of the Code of Business Conduct see the "Business Ethics Folder" on HR Fills Series 47,201.8.75 or Norriel's Internal World Wide Web Page.

JEAN C. MONTY • PRESIDENT AND CEO