Business Guideposts:
A Personal Commitment



Profitable growth with integrity ...

Lucent Technologies
Bell Labs Innovations

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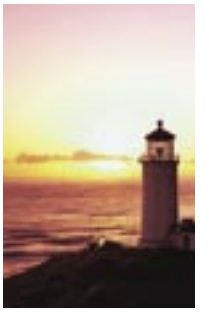

To All Lucent Employees and Board Members,

As we work in an environment that changes continuously, one thing remains constant: our commitment to conducting business ethically and to complying with company policies and the laws that regulate our activities around the world. It's a commitment we take very seriously.

On the following pages, you will find *Business Guideposts: A Personal Commitment,* our code of conduct. *Business Guideposts*, along with our company Values, guides the way we interact with each other, our competitors, our suppliers, our business partners and our customers. Our actions — individually and collectively — form our reputation, which is critical to our success.

All employees are required to review *Business Guideposts* and certify that they understand and will live by the concepts set forth in our code. Since no code of conduct can anticipate and cover every business situation, common sense and good judgment are your best guides. In other instances, you may also want to consult with your colleagues, your supervisor or other managers for guidance.

If you have questions about *Business Guideposts*, or if you become aware of a potential violation of the standards outlined in *Business Guideposts*, call the *Compliance Hotline* (listed in the Quick Reference Guide at the end of this document). The Hotline is available to respond to your call 24 hours a day, seven days a week, in almost any language. All information provided will be kept confidential to the extent possible and there will be no reprisal for reporting, in good faith, suspected violations of law or company policy.

Each of us plays a critical role in upholding the highest levels of business ethics and personal integrity in everything we do. Working together, we must continue to set and meet the highest standards of business excellence by ensuring that our decisions and actions are both legal and ethical. That's how we create and maintain a "culture of compliance." It's up to every one of us to protect Lucent's reputation and build a foundation for long-term success.



Patricia F. Russo

Chairman and Chief Executive Officer

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Lucent's Purpose and Values



We Are Guided by Our Purpose and Values

Lucent's Purpose

The people of Lucent are committed to this purpose:

Creating new possibilities to enhance people's lives by transforming the way the world communicates.

Lucent's Values

Our Values are based on our proud and shared traditions and guide our actions as we go forward to create our future. These Values are our touchstone. They describe the kind of company that we aspire to be. They guide the behavior and decisions of all Lucent Technologies people around the world as we interact with our customers, our partners, our suppliers, the communities in which we work and live, and — most of all — each other. We value:

A total focus on serving our customers

We work with customers as a team. We strive to ensure we are their partner of choice. We meet every commitment we make to them and communicate swiftly when there is an issue. We understand their total business, anticipate their needs and exceed their expectations. We also understand what competitors are offering and do better by regularly measuring our performance, sharing the results and working for continuous improvement. Where appropriate, we will work collaboratively with global business partners to address customers' needs.

A commitment to business excellence

Results focused

We are results focused. We set clear goals that reflect our aspiration to be the best in the world, approaching the market with a "take share" attitude and focusing on profitable growth with integrity. We focus only on those activities that produce meaningful results. We establish clear accountability and reward people and teams who deliver those results. We each take individual ownership for the success of Lucent Technologies.

Innovation

We continuously innovate so that our products, processes and services better serve customers. We give people the flexibility to perform their jobs and we reward their creativity.

Quality

We deliver products with better-than-benchmark quality and reliability from the beginning of the product cycle. We work to achieve continuous improvement in our processes and products through a commitment to quality principles and ensure quality in every customer interaction.

Speed

We maintain a sense of urgency about fulfilling commitments. We are faster than the competition in recognizing and responding to customer needs and in bringing products to market. We make decisions and act on them with speed. Though we work rapidly, we do not sacrifice quality, safety or integrity.

A deep respect for the contributions of each person to the success of the team

We believe a diversity of people and ideas is a business imperative and that diversity must be sought and nurtured. We recognize excellence in each other, and we listen to and value each other's ideas and opinions. No person is alone in his or her pursuit of an objective; we are a team. We are honest and candid in all our dealings with customers, shareowners, suppliers, partners, the communities in which we work and live, and with each other. We encourage constructive contention and confront issues with mutual respect. We treat everyone with dignity and respect. We proactively communicate and share information with colleagues throughout the business to ensure that each individual is informed of and engaged with our goals.

A strong sense of social responsibility

We accept our responsibilities to serve and enhance the communities and the society on which we depend. We allocate a portion of corporate resources to support the communities where we work and live.

A commitment to ethics

We uphold the highest levels of business ethics and personal integrity in all of our dealings with our customers, shareowners, suppliers, partners and each other. We comply with all applicable legal and company requirements, as well as the guiding principles set forth in *Business Guideposts: A Personal Commitment*. We support behavior consistent with our Values, and we speak up when we see behavior that is inconsistent with them.

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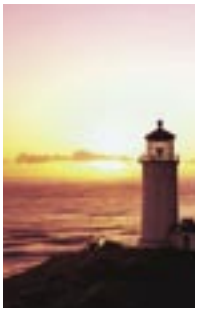
Introduction



Commitment

Since Lucent's inception, we've been committed to achieving the highest levels of business ethics and personal integrity — business values that are the foundation for all of our decisions and actions, and which will continue to drive our future success.

We are all responsible for making this commitment a reality — from every meeting we conduct to every contract we negotiate to every strategy we implement. By complying with the standards set forth in *Business Guideposts: A Personal Commitment* and all applicable legal requirements, we ensure that Lucent continues to meet the highest standards of business excellence that our customers, suppliers, business partners, shareowners and colleagues expect from us.

Purpose

Lucent's code of conduct, *Business Guideposts: A Personal Commitment*, describes Lucent's standards for ethical business behavior and addresses a wide range of business and personnel issues. Our code of conduct provides information about the standards of integrity that Lucent requires all employees, as well as members of the Board of Directors (Board), to follow. It does not address every situation or set forth every rule, nor is it a substitute for the responsibility of every employee to exercise good judgment. Lucent, in its sole discretion, may modify the terms of *Business Guideposts* at any time. Such modifications immediately become effective for all employees and Board members, regardless of their hiring date or date they joined the Board.

Applicability

Business Guideposts applies to all Lucent employees and Board members and all subsidiaries and joint ventures controlled by Lucent. Lucent expects that contractors, consultants, agents, representatives and others conducting business on behalf of Lucent also will conform to the behaviors required by *Business Guideposts*. This document should be shared with these individuals, and their failure to conform to these standards should be considered a potential basis for terminating Lucent's relationship with them.

As required by U.S. laws, Lucent confirms that it will not waive compliance with *Business Guideposts* for any officer or member of Lucent's Board of Directors unless approved by the Board or a committee of the Board. Lucent will promptly and publicly disclose any such waiver to its shareowners.

Links to Resources

Throughout this document, you will find references to Lucent organizations and policies highlighted in red and italicized. Each reference is listed in the section "Quick Reference Guide," where you will find contact information and links to additional resources on the Lucent intranet.

Our Customers

We Are Committed to Maintaining Our Customers' Trust



We Put Our Customers First

Lucent is a customer-driven company with a relentless focus on delivering unmatched value to our customers. As Lucent employees, we listen to our customers, provide creative solutions and consistently meet or exceed all of our commitments to them. We are honest in all aspects of our dealings, from procurement to delivery, and flawlessly execute on all customer contract requirements.

Truthfulness Is the Cornerstone of Our Marketing

We compete vigorously, but fairly. We do not misrepresent our products or capabilities, even if it means losing a sale. Where failure to disclose a significant fact could mislead a customer, we disclose the information. We communicate clearly and precisely so that our customers understand the terms of our contracts, including schedules, prices and responsibilities.

Our Advertising Is Accurate

To maintain our customers' hard-won trust, our advertisements and other communications must always accurately and fairly describe our products and services. We avoid deceptive practices, which could impair our relationship with our customers or harm Lucent's reputation.

I downloaded some criticisms of a competitor from the Internet. May I share them with a customer?

We prefer to market ourselves by highlighting the advantages of our products and services. Reliable information about the shortcomings of a competitor's offering may be communicated. However, under no circumstances should we attempt to market by providing our customers with unverified information.

We Do Not Buy Business Through Gifts and Favors

Never pay, offer or promise to provide money, favors, inappropriate gifts or anything else of value to influence, direct, obtain or retain business or secure any improper advantage. Never allow an agent, representative or business partner to make these types of payments, offers or promises on Lucent's behalf. These payments or favors may be considered bribery, which violates Lucent's policy, as well as the laws of most countries where we conduct business. It is equally unacceptable to take bribes in any form, although certain gifts may be accepted in accordance with the standards set forth in "Our Suppliers – Gifts."

May I give one of my customers or suppliers tickets to a sporting or cultural event?

Giving tickets to a customer or supplier is acceptable if it is part of relationship management, and if your supervisor gives approval in advance. However, giving gifts to a customer is prohibited if your customer is a U.S. government official, employee or representative. If the customer is owned or controlled by a government outside the United States, or is a representative or employee of a government-owned or controlled customer, giving tickets, gifts or anything of value may only be done in certain limited circumstances. Before proceeding, you

must ensure that the circumstances are appropriate under applicable laws and are consistent with Lucent policies. See "Government Customers Outside the United States" or contact the *Law Division* for assistance.

We Comply With All Rules and Regulations That Apply to Sales to Government Customers Which Are Branches of a Government Entity or Are Government-Owned or Controlled

Special care must be taken when dealing with customers and all employees of those customers that are branches of a government entity or are owned, in whole or in part, by a government. Activities that might be appropriate when working with private sector customers may be improper and even illegal when dealing with branches of a government entity or government-owned or controlled customers and their employees. The same caution should be used when providing goods and services to another customer who, in turn, will deliver the product or service to a government end-user or a government-owned or controlled customer. If you work with government customers, be aware of applicable procurement, bribery and other laws in that country.

How can I find out if my customer is owned or controlled by a government?

You should check the *Anti-Corruption – Foreign Corrupt Practices Act* Web site or contact the *Law Division* for additional information.

Government Customers Outside the United States

Generally, it is Lucent's policy not to offer or provide gifts, entertainment, tips, favors or anything of value (including, in some countries, meals and travel expenses) to an employee of a government-owned or controlled customer, a foreign official, foreign political party or foreign political party official or candidate. Additionally, most countries have anti-corruption laws prohibiting or restricting the provision of gifts, entertainment, meals, tips, favors or anything of value to both domestic and foreign officials, including employees of government-owned or controlled customers, political party officials and candidates for political office or political parties.

A "foreign official" may be defined as:

- Any officer or employee of another country's government or any governmental organization;
- Any officer or employee of a public international organization;
- Any person acting in an official capacity for or on behalf of any such entity; or
- Any officer, director or employee of a government-owned or controlled company, members of royal families, consultants and others who exercise official influence.

Many of Lucent's customers outside the United States are government-owned or controlled. Employees of these customers are defined as "foreign officials."

If, in connection with Lucent business, you want to provide a gift, meal, entertainment or favor to any of these persons, or you want to invite them to a Lucent-sponsored event, you must obtain prior approval in accordance with

the Lucent Gifts, Travel and Entertainment Guidelines, available at the *Anti-Corruption – Foreign Corrupt Practices Act* Web site. The *Law Division* can assist you in determining whether your activities are covered by the laws and special rules applicable to dealings with government officials and provide appropriate guidance. Contact the *Compliance Hotline* if you suspect a violation of these laws or otherwise have questions.

U.S. Government Customers

The U.S. government has very strict rules prohibiting the provision of gifts, entertainment, meals, favors or anything of value to its employees. These rules also apply to government contractors and subcontractors. It is never appropriate to offer or provide gifts or other favors to a U.S. government official, employee or customer, regardless of the value of such gift or favor. Under certain circumstances, you may not receive gifts, entertainment, meals or favors from your suppliers if you are directly or indirectly involved in providing products or services to the U.S. government. For more specific guidance, consult the Lucent *Government Compliance and Integrity Program*. If you work with the U.S. government, you are required to become familiar with this program.

May I invite a U.S. government customer to participate in a working lunch paid for by Lucent?

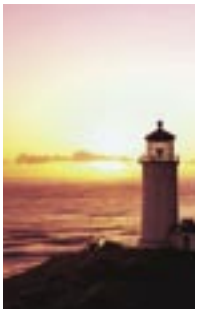
Yes. However, U.S. government regulations require that the government employee reimburse Lucent for the cost of the meal.

What is the Lucent Government Compliance and Integrity Program and to whom does it apply?

There are special rules and regulations that Lucent employees and contractors must follow if they work on any U.S. government contract or subcontract. The Lucent *Government Compliance and Integrity Program* supplements Lucent's *Business Guideposts* in this area.

Our Suppliers

We Select Suppliers Based on Merit



We Select Suppliers Based on Their Ability To Help Lucent Meet Its Business Objectives

We select our suppliers based on merit considering, among other things: price, quality, delivery capability, reputation for service, integrity and their overall relationship with Lucent. Furthermore, in purchasing products, commodities and services by or on behalf of Lucent, we comply with the sourcing strategy and procedures set forth in Lucent's *Sourcing Policy*. While a supplier's purchases from Lucent may be taken into consideration, we do not attempt to force a supplier to purchase from us.

We Do Not Accept Inappropriate Gifts and Do Not Allow Gifts and Entertainment Offers To Affect Our Purchase Decisions

Gifts

Gifts are generally given to create goodwill and, in some parts of the world, declining a gift may insult the giver. On the other hand, accepting a gift may create a conflict of interest or the appearance of a conflict of interest. This presents a dilemma for the recipient of a gift. Generally, you may accept a gift if it is unsolicited, inexpensive (less than US $100) and not given to influence your judgment. Otherwise, you should decline it and explain Lucent's policy to the gift giver. Never solicit gifts, directly or indirectly, from customers or suppliers. Under no circumstances may you accept, directly or indirectly, payments, loans, bribes, kickbacks, special privileges, favors or services from anyone.

In parts of the world where gift giving is common practice and not accepting a gift could reflect badly on Lucent, it may be appropriate to accept a gift of more than nominal value, provided that doing so would not violate any laws or in any way discredit Lucent, and the gift is unsolicited and not given to influence your judgment. If you receive such a gift, it is important to notify your supervisor in writing as soon as possible to determine whether you may retain the gift or whether the gift should become Lucent property.

For more information, see "Our Customers – Government Customers Outside the United States" and "Our Customers – U.S. Government Customers."

One of my suppliers sent me a personal gift during the holiday season as a "thank you" for Lucent's business. May I keep it?

You may accept the gift if it meets all of the following criteria:

- It is unsolicited;
- It is inexpensive;
- It will not influence, or be perceived as influencing, your business judgment; and
- You have discussed the situation with your supervisor, and your supervisor approves.

Entertainment

Appropriate entertainment and hospitality are important components of building relationships between Lucent and its customers, suppliers and business partners. The type of entertainment provided and the manner in which it is provided should be consistent with business goals, in good taste and not offensive or dangerous to any of the participants.

Examples of inappropriate entertainment or conduct include, but are not limited to:

- Visiting or sponsoring events at inappropriate venues, such as adult entertainment clubs;
- Excessive use of alcohol while representing Lucent; and
- Lewd or vulgar behavior (such as use of offensive language).

You may accept occasional meals or other modest forms of entertainment from customers or suppliers as a courtesy extended during the normal course of business, provided that the entertainment is not being offered to influence your business decisions. If a customer or supplier proposes entertainment that is more than modest or routine, you must consult your supervisor before accepting the invitation.

Employees may not use, for personal or other non-business related purposes, Lucent-owned assets (such as club memberships) that are intended for business use.

For more information, see "Our Customers – Government Customers Outside the United States" and "Our Customers – U.S. Government Customers."

My sales team is entertaining customers at a sporting event. May we have alcohol at this event?

Consumption of alcoholic beverages at company-sponsored events requires senior management approval and may be authorized provided that, among other things, consumption is limited, consistent with local customs and does not endanger the personal safety of the participants or interfere with their ability to conduct business effectively. See the *Employment Policy Guide* for more details.

I am taking some customers and employees out to dinner and some of the participants would like to go to an adult entertainment club after dinner. Is it permissible if everyone pays his or her own expenses?

No. This type of entertainment is inconsistent with Lucent's *Values* and is not permissible under any circumstances. "Local custom" is not an acceptable justification for this conduct and does not supersede Lucent's code of conduct.

One of my customers has invited me to attend a three-day conference sponsored by his company at a major resort. The conference agenda includes some business activities but also provides leisure activities. May I accept the invitation to attend? If the same invitation came from a supplier, may I accept?

You may accept the invitation provided that your participation at the conference is important to the business, the conference agenda is primarily business-related and you have obtained prior management approval consistent with Lucent's *Approval Matrices* and *Travel Policy*. If the same invitation came from a supplier, you must make certain that acceptance of the invitation does not create a conflict of interest or appearance of a conflict of interest, or otherwise improperly influence your judgment or business decisions.

We Select Sales Consultants, Agents and Other Representatives Whose Conduct Reflects Lucent's Values

Lucent carefully reviews the credentials and reputations of prospective sales consultants, agents and representatives and selects them in accordance with the Foreign Corrupt Practices Act (FCPA) Guidelines for Hiring Sales Consultants and Representatives, which is available on the *Anti-Corruption – Foreign Corrupt Practices Act* Web site. Lucent retains these individuals or entities based solely on the terms of written agreements after the appropriate approvals are secured. Lucent carefully monitors the performance of its sales consultants, agents and representatives to assure that they comply with applicable laws and conduct their business in a manner consistent with *Business Guideposts* and other applicable Lucent policies. Sales consultants, agents and representatives are subject to the same laws as our employees and, therefore, they cannot do what Lucent's employees are legally prohibited from doing. If you know or suspect that any agent, consultant or representative is conducting business in an unethical or illegal manner, contact your supervisor and the *Compliance Hotline* immediately.

Our Competitors

We Compete Vigorously, Fairly and Ethically



We Do Not Engage in Illegal, Unethical or Anti-Competitive Practices To Promote Lucent Sales

Most countries in which Lucent does business have antitrust or other types of competition laws designed to benefit customers by promoting competition. In particular, these laws are intended to make certain that customer choices in the marketplace are not encumbered by improper agreements or other improper conduct that would affect price, restrict volumes produced or reduce the variety or quality of products or services otherwise available to customers.

Certain kinds of agreements (both formal and informal) are so harmful to customers that they are absolutely prohibited by these laws. Likewise, Lucent policy prohibits Lucent employees, contractors, consultants, agents, or anyone working on behalf of Lucent to enter into any of these types of agreements.

Examples of agreements that violate Lucent policy include:

- Agreements or understandings with competitors on price;
- Agreements or understandings with competitors to "divide up" customers, products, services or territories;
- Agreements or understandings with competitors to limit the supply or production of any product or service;
- "Bid-rigging" (e.g., reaching a prior agreement with competitors to govern conduct in the bidding process) or making agreements or reaching understandings with competitors not to bid in public or private procurements;
- Agreements or understandings with competitors to disadvantage other competitors; and
- Dictating the minimum price that independent distributors or resellers may charge to resell Lucent products.

Parties entering into these types of agreements can be prosecuted under criminal law, resulting in significant fines for corporations and fines and jail time for the employees involved.

An unlawful agreement on "price" can cover a broad range of agreements among competitors that directly or indirectly affect the price of goods or services. This includes, for example, agreements on price ranges, minimum prices, list prices, advertised prices, pricing formulas, discounts, rebates, profit margins, credit and warranty terms or other terms of sale.

An "agreement" or "understanding" need not be in writing for it to be unlawful. It can be oral or inferred from the conduct of the parties, as in the following examples:

- An informal observation to a competitor about a company's likely future prices;
- Comments to a competitor about the desirability of an entire industry following a price increase; or
- Comments to a competitor about the desirability of ceasing discounts to certain customers.

These kinds of situations have each been used (along with other circumstantial evidence) to charge companies and individuals with criminal price-fixing. It is for this reason that you should avoid any conduct or activity, formal or informal, from which even an appearance of improper conduct could be drawn.

The obligation to scrupulously avoid even an appearance of impropriety applies in business settings, as well as to communications with competitors in casual social settings (golf games, civic events, etc.). There are no "off-the-record" discussions with competitors. In addition, a supplier in one market may be a competitor in another. Conversations that are wholly appropriate in the context of a supplier relationship may be inappropriate when discussions shift to issues relating to areas of competition.

There are other activities that, under certain circumstances, may also violate the various antitrust laws and should be reviewed by the *Law Division*.

Examples include:

- Agreements with suppliers or customers not to do business with others;
- Certain exclusive dealing arrangements;
- Significant differences in prices offered to customers or distributors who compete with each other;
- Charging prices that are below cost in order to drive a competitor out of a market;
- Dictating maximum resale prices; or
- Selling products or services only on the condition that the buyer also purchase a second product or service.

Trade Groups

Trade shows and trade association activities are an important part of conducting Lucent's business; however, because they provide an opportunity for competitors to meet and discuss common issues, they are also a potential source of anti-competitive agreements. In fact, a large percentage of government prosecutions for antitrust violations involve trade group-related activities. As a result, it is important that, whenever you participate in trade show or trade association activities, you avoid even the appearance of engaging in improper discussions with our competitors. Under no circumstances should you participate in any discussion with competitors about pricing, price trends, profit margins, bids, terms or conditions of sale, customers, production capacities, marketing or product plans, business strategies or other such topics. If you find yourself involved in such a discussion, object immediately. If the discussion persists, excuse yourself and report the incident to the *Law Division*.

Standards Development Groups

The development of industry standards is important to allowing interoperability among products and, when done properly, will enhance competition. Standards development activities, however, should not be misused to exclude the products of competitors from the marketplace. Lucent is committed to fair and open standards development activities that invite the participation of all interested parties. When representing Lucent in standards development groups, you should avoid discussions that stray from legitimate topics. Under no circumstance may you discuss pricing or marketing of products relating to the standards being discussed. You must also avoid any agreements that appear to limit any participant's ability to develop and market products that do not conform to adopted standards.

Because this area of the law is complex and the penalties for violation are severe, contact the *Law Division* whenever you have questions about the antitrust laws of the countries in which Lucent conducts business.

Are there specific subjects I should never discuss with competitors?

Yes. Generally, company policy and legal requirements prohibit discussions with competitors regarding, among other things: prices, profit margins, costs, bids, terms or conditions of sale, sales territories, customer lists, production levels or capacities, inventories, proposed new products or services, marketing plans, division of the market and distribution arrangements.

I am going to a trade show. May I go to a competitor's booth?

Yes. You may go to the booth and collect any publicly distributed literature. However, if you talk to the competitor's personnel, you should not misrepresent your identity or affiliation, and you must avoid conversations on the subjects listed previously.

We Employ Only Ethical Means of Obtaining Information About Our Competitors

Competitive Information Gathering

Gathering information about competitors, when done properly, is a legitimate business activity. It enhances our knowledge of the marketplace and helps us understand and meet customer needs. However, competitive information should not be obtained, directly or indirectly, by improper means. It is improper to be involved in bribery, misappropriating trade secrets or other confidential information, inducing someone to breach a nondisclosure agreement, making improper requests of a competitor or customer, or using deceit or trickery. Improperly collecting or using competitive information may subject Lucent, and the individuals involved, to lawsuits or criminal penalties, up to and including imprisonment. The same rules apply when we retain consultants to gather competitive information on our behalf.

Special laws govern the collection of competitive information in connection with a U.S. government contract or subcontract. For more specific guidance, consult the Lucent *Government Compliance and Integrity Program*.

Benchmarking

Benchmarking is a form of competitive information gathering and is subject to the antitrust laws to the same extent as any other Lucent activity. A practice that otherwise violates the antitrust laws, such as sharing price information, does not become permissible by labeling it as benchmarking. Contact the *Law Division* if you have any questions regarding competitive information or benchmarking.

May I call a competitor and pretend to be a potential customer to find out information about the competitor's sales approach?

No. You must never use deceptive practices to obtain competitive information on behalf of Lucent.

My operating unit recently hired an engineer from one of our competitors. May I use her as a source of competitive information, such as finding out the details of her former employer's new product development plans?

No. While you may use her expertise and skills developed during her employment by our competitor, you may not ask her to divulge information that might reasonably be considered confidential or proprietary by her former employer.

Lucent is planning to submit a response to a customer's request for bids. The customer has offered to give me a copy of a competitor's confidential proposal. May I accept it?

No. Accepting the proposal constitutes misappropriation of the competitor's trade secrets. You and Lucent could be in violation of certain laws merely by your possession of the proposal, even if you do not use the competitor's information in connection with Lucent's bid.

We Do Not Hire Employees or Contractors in Violation of Laws or Various Agreements They or Lucent May Have With Third Parties

Sometimes potential new hires or contractors have agreements with their current or past employers that may prohibit their working at or on behalf of Lucent (e.g., "non-compete provisions"). In other cases, obligations of confidentiality to their current or former employers may restrict the type of work that they can do at or on behalf of Lucent. In some instances, Lucent enters into agreements with third parties (e.g., customers, suppliers and others) that prohibit Lucent from extending offers of employment to their employees (e.g., "non-solicitation provisions"). In addition, various legal concerns may prohibit Lucent from hiring certain individuals. For example, an employer may not hire an individual to obtain the proprietary trade secrets of the employer's competitor.

Before extending an offer of employment to a candidate or hiring a contractor or consultant, you should undertake a reasonable investigation to make sure that none of these barriers exist. For employment candidates, this investigation should be conducted with the assistance of *Human Resources*. For contractors or consultants, this investigation should be conducted with the assistance of Lucent's *Supply Chain Networks* (SCN) organization. If you have any questions, contact the *Law Division*.

"George" is employed by a Lucent competitor and, as a result of having worked for the competitor, has gained knowledge and expertise in an area that is both proprietary to the competitor and critical to Lucent's needs. We would like to recruit him to work in that area. May we?

While there is no general prohibition against hiring an employee from a competitor, certain legal concerns prohibit us from hiring our competitor's employee to gain its proprietary information, even if there is no specific contractual "non-compete" obligation. In addition, Lucent respects the proprietary information of other companies and requires its employees to adhere to any enforceable obligations to current or previous employers. In this case, it is likely that we may not be able

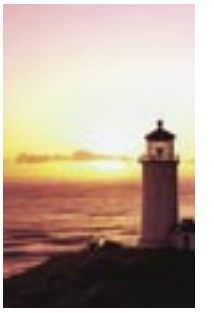
to hire George if this position at Lucent will require him to use the proprietary information he obtained while working for our competitor. You should contact *Human Resources* and the *Law Division* to determine whether a competitor's employee may be hired by Lucent and, if so, what restrictions may be appropriate.

"Jane" is a contractor who has worked with our group for three months. We like her work and want to hire her as an employee. May we?

You should contact Lucent's *Supply Chain Networks* (SCN) organization to determine whether Lucent has any contractual agreements that would prevent Lucent from hiring Jane away from our supplier or would otherwise require Lucent to pay our supplier a fee for the right to hire her. In addition, contact *Human Resources* for assistance in the recruitment and hiring process; only that organization may make offers of employment.

Our Colleagues

We Treat Each Other With Dignity and Respect



We Recognize and Respect the Diversity of Our Colleagues and Never Engage in Any Activity That Is Discriminatory, Harassing or Retaliatory

Lucent is committed to providing a work environment that nurtures each employee as an individual and an important member of the culturally diverse, worldwide Lucent team. In keeping with this commitment and our value of mutual respect, Lucent is committed to providing a work environment free from discrimination based on: race; color; creed; religion; national origin; citizenship; sex; age; disability; sexual orientation; gender identity, characteristics or expression; marital status; covered veteran status; or any other protected class. This means that we comply with both the letter and spirit of all applicable civil rights and employment legislation and laws governing employment wherever Lucent employees work. At Lucent, we do not unlawfully discriminate against anyone in any aspect of employment, including recruiting, hiring, compensation, promotion or termination.

We also do not permit conduct that creates an intimidating or offensive work environment, whether at a Lucent location or during a Lucent-sponsored activity. This conduct includes, but is not limited to: racist, sexist, ethnic or homophobic comments or jokes; sexual advances or inappropriate physical contact; sexually-oriented gestures, pictures, jokes, e-mails or Web sites; or derogatory remarks about a person's religious beliefs.

If you believe that you are the victim of discriminatory or harassing conduct or you have witnessed such conduct directed at a colleague, talk to your supervisor or call Lucent's *Compliance Hotline*. All complaints will be investigated promptly and without reprisal to the person initiating the investigation.

When I'm traveling on Lucent business, I understand that my behavior while in meetings or at group dinners is subject to company policy. Must I continue to adhere to Lucent's policies and code of conduct in a social setting after official business events have concluded?

Yes. Lucent employees are expected to comply with company policies at all times while traveling on business or otherwise representing Lucent, regardless of whether they are in a meeting during business hours, or relaxing with colleagues after hours.

We Encourage Open Communication and Constructive Disagreements Based on Mutual Respect

Open communication is essential to upholding our value of mutual respect. It means we give one another accurate and timely information about business issues. We listen to each other and to our customers, suppliers and business partners because we believe communication is as much about listening as it is about talking. Differing opinions and expressions of concern are welcome. While we may disagree with one another, we know that healthy debate is important. We keep the channels of communication open.

When communication takes the form of a concern or complaint, we take that concern or complaint to the appropriate person (e.g., a colleague or supervisor) for an open discussion. If we cannot solve a problem directly by speaking with

the person with whom we have an issue, or good judgment dictates that it is not appropriate to discuss the issue with the person, we take the matter to higher management or other appropriate persons without fear of reprisal.

Our Communication Is Always Professional and Courteous

Our communication with one another and with other stakeholders (including customers, suppliers and business partners) is professional, courteous and free from bias. Being rude or abusive to colleagues, customers, suppliers, business partners or others is never acceptable.

During a colleague's presentation at a team meeting I asked questions. I felt that the response I received was abusive, and I was offended. What should I do?

Lucent encourages open communication, differing opinions on issues and healthy debate among colleagues. Nonetheless, while we may disagree with one another, we may not do so in a manner that would reasonably be understood as rude or abusive. Lucent policy prohibits conversation that is derogatory, discriminatory or otherwise in violation of Lucent's *Equal Opportunity Policy*. If you feel that you have been treated differently, for example, based on your age, sex, religion or other characteristics, contact the *Compliance Hotline.*

We Are Accountable for Our Commitments

Our colleagues, customers and others depend on us to take responsibility for what we say and do. When we make commitments, we keep them. If we are going to be absent from work or cannot meet a commitment, we promptly inform our supervisors so commitments to customers and others can be met.

We Respect the Privacy of Employee Records

Lucent recognizes that privacy is important to each of us and respects all applicable data privacy laws and regulations in order to protect personal information. The company maintains only those employee records required for business, legal or contractual reasons and limits access to and knowledge of such records to those who need the information for legitimate business or legal purposes.

Lucent will not improperly disclose any personal information about employees. Under certain circumstances, it is possible that personal information may be subject to disclosure pursuant to certain laws, regulations, judicial or other government subpoenas, warrants, orders or administrative acts. In such cases, Lucent will comply with all applicable legal requirements, while limiting the disclosure of personal information to the extent possible under the circumstances.

Every Lucent employee is required to treat personal information with the appropriate level of confidentiality and care and in compliance with applicable laws and policies. Personal information may cross geographic borders, and different privacy laws and requirements may apply, depending upon the transaction. Contact the *Law Division* in the event you have any questions or concerns.

We Work To Ensure a Safe Work Environment

Lucent is committed to making the work environment safe for its employees and others wherever we work around the world. We comply with all applicable laws and regulations relating to safety and occupational health in the workplace. We inform our employees about procedures that are in place to protect them from generally recognized workplace hazards. We immediately report dangerous conditions to prevent or otherwise minimize workplace accidents. In day-to-day operations, we integrate safety, occupational health and ergonomics into the design, manufacturing, installation, use, maintenance and service of products.

To help maintain a safe and secure work environment, Lucent prohibits certain activities. Examples include:

- Threatening or violent behavior, or even the suggestion of such behavior, toward others, including colleagues, customers and suppliers;
- Possession of firearms, explosives or other weapons anywhere on company property (including parking lots) or while conducting company business; and
- Willful destruction of company property or the property of others.

See the *Environment, Health and Safety* Web site for additional information.

What should I do if I become aware of a serious environmental or safety hazard?

Tell your supervisor immediately and contact your local Lucent environment, health and safety (EH&S) representative. If these resources are not available or are unknown to you, contact Lucent *Environment, Health and Safety.*

Illegal Drugs Have No Place at Lucent

Lucent is committed to a drug-free workplace. The misuse of drugs, both legal and illegal, while on company premises or business interferes with a safe, healthy and productive work environment and is prohibited. In addition, Lucent prohibits the use, possession, distribution or sale of illegal drugs on its premises, in its vehicles and while conducting Lucent business. No employee may conduct Lucent business while under the influence of drugs or alcohol.

I take painkillers for a knee injury. Does taking the medication while at work violate Lucent's anti-drug policy?

The use of non-prescription drugs taken in accordance with their directions and the use of prescription drugs taken as prescribed by a medical professional do not constitute a violation of Lucent's anti-drug policy. However, if the use of any such drugs affects your judgment, performance or ability to do your job in a safe manner, you should not conduct Lucent business. In this case, you should consult with *Health Services.*

Promoting Lucent's Interests

We Do Not Base Business Decisions on Personal Interests



We Avoid All Conflicts of Interest With Lucent and We Do Not Use Our Relationship With Lucent for Personal Gain

We do not compete with Lucent and never let business dealings on behalf of Lucent be influenced, or even appear to be influenced, by personal or family interests. For example, we do not:

- Influence, either directly or indirectly, Lucent's dealings with any supplier with whom we have a personal, familial or financial relationship;
- Work for, represent or favor for personal reasons a customer or supplier in its dealings with Lucent;
- Accept preferential stock offerings that are generally unavailable to the investing public (e.g., "friends and family" stock programs) from companies with whom Lucent does business; or
- Use Lucent's name, information, property, time or other resources to perform outside activities, such as working a second job, or performing volunteer work or community service not specifically sponsored or approved by the company. These activities must always be kept separate from your employment with Lucent.

Your supervisor can help you sort through situations that may involve conflicts of interest. In addition, Lucent has a *Conflict of Interest Disclosure Process* that provides a forum for disclosing and resolving potential conflict of interest issues. Visit the *Office of Business Conduct* Web site for additional information.

My sister owns a business and is trying to become a Lucent supplier. May I help direct her to the appropriate party in Lucent?

Yes. You may make the introduction. However, the decision-maker within Lucent should be made aware of the relationship and must comply with the sourcing strategy and procedures set forth in Lucent's *Sourcing Policy*. In addition, you should avoid participating directly in the decision-making process or otherwise unduly influencing the process.

My spouse and I own a small graphic arts business. The work I do for that business is totally unrelated to my Lucent job. I am sure that I could provide Lucent with a superior product at a reduced cost. May I be both an employee and a supplier to Lucent?

No. Your primary obligation is to Lucent and providing services as a vendor would be a conflict of interest. Your spouse, if in business by himself or herself, could bid on Lucent jobs provided that: 1) he or she does not use your Lucent employment to influence the bidding process; 2) you do not participate in the performance or evaluation of the work if he or she gets the job; and 3) the relationship is reported to your supervisor.

Are there any restrictions to my accepting a second job outside of Lucent?

Yes. You are free to use your own time as you see fit. However, your employment outside of Lucent must not create, or appear to create, a conflict of interest with your responsibilities at Lucent. For example, you must not accept a job that could discredit Lucent or interfere with the independence and objectivity of your

judgment. Your second employment must be kept totally separate from your Lucent employment. In no event may you use Lucent's name, information, time, property or other resources to perform your second job.

A Lucent supplier with whom I work has offered me the opportunity to buy stock in the supplier's company as part of an initial public offering. The supplier's chief financial officer informs me that this offering is desirable and is a rare opportunity. May I purchase the stock?

No. In this case, you would be obtaining a personal benefit from the supplier because of your position at Lucent and Lucent's relationship with the supplier. Therefore, you may not participate in the supplier's stock offering.

We Do Not Compete With Lucent

To avoid competing with Lucent, you may not enter into unauthorized business relationships with competitors. This means, among other things, that you must not own a competing business or assist any unauthorized person outside Lucent, including family or friends, in the planning, design, manufacture, sale, purchase, installation or maintenance of products that compete or could compete with Lucent's products, services or any work performed by Lucent.

I am interested in making a small personal investment in a company that competes with Lucent. May I make the investment?

To determine whether your investment conflicts with, or appears to conflict with, your professional responsibilities at Lucent, you must disclose the nature of the investment to your supervisor. Your supervisor should consider the relevant factors in making the determination, including the nature of the competition, whether or not the investment is in a public or private company, the size of the investment and your responsibilities at Lucent.

Supervisors requiring further assistance in this area should contact the *Law Division* for guidance.

We Do Not Use Our Inside Knowledge of Lucent's Business Inappropriately

Securities laws prohibit the use of inside information when buying, selling or trading publicly traded securities, including Lucent stock. Inside information can take many forms, but always includes information that is not available to the general public and might influence an investor's decision to buy, sell or hold securities in a company. This information can include acquisition or divestiture plans; financial information or projections; new contracts, products or discoveries; major organizational changes; or other business plans. Often, it involves information that you learn about as a Lucent employee regarding a company other than Lucent (e.g., a supplier that wins or loses a big order from Lucent).

For example, you must not:

- Buy, sell or trade Lucent securities or the securities of other companies about which you have inside information until that information becomes public;
- Share inside information about Lucent or another company with anyone else, including family members or friends;
- Advise anyone about trading any securities based on inside information;
- Engage in any transaction where you can profit from short-term speculative swings in the value of Lucent securities, such as "short sales" (selling borrowed securities that the seller hopes can be purchased in the future at a lower price); or
- Trade "put" and "call" options (publicly available "rights" to sell or buy securities within a certain number of months at a specified price) on Lucent stock or other derivatives of Lucent stock because trading these securities may create the appearance of impropriety. In addition, under Lucent's *Stock Trading Policy*, you may be prevented from exercising the option before it expires.

Special rules apply to transactions in Lucent stock occurring in Lucent's employee benefit plans (e.g., the Lucent Savings/401(k) plans). Lucent's *Stock Trading Policy* explains these rules and restrictions in greater detail.

Because inside information is extremely valuable, you must handle it as you would handle other Lucent proprietary information. Do not discuss it with family, friends or anyone else. Do not talk about it in public places. Do not discuss it in online forums (public or private), including message boards and chat rooms. Do not fax it to unattended machines. Do not mail it electronically without taking appropriate security measures. Do not tell others at Lucent unless they must know for business reasons. These restrictions apply, not only to the inside information itself, but also to opinions you formulate based on inside information.

If you have questions about inside information, contact the *Law Division*.

We Speak Publicly on Behalf of Lucent Only When We Have the Authority To Do So

As a leading technology company, Lucent's opinion on a host of issues is respected and often solicited. Public comments made by identified Lucent employees and contractors in a variety of contexts such as trade shows, news media interviews and even online chat rooms and newsgroups may be perceived by outsiders as representing "official Lucent positions." Similarly, fax or e-mail communications in which Lucent's name appears on the cover sheet, in the letterhead, in a footer, or in the employee's e-mail address may be viewed by the recipient as expressing Lucent's position, whether intended or not. As a result, Lucent employees should:

- Refrain from speaking on behalf of Lucent unless authorized to do so;
- Contact their *Public Relations* representative before replying to any media inquiries or making a public statement, such as a news release issued by Lucent or a related third party. All news releases that mention Lucent, including those issued by a third party, must be approved by *Public Relations'* Media Relations staff;
- Direct any reporter or analyst who calls to the proper department: reporters to the Media Relations staff, industry analysts to the Industry Analyst team and securities analysts to the *Investor Relations* team. Then notify the relevant department to expect a call from a reporter or analyst;
- Never publicly disclose Lucent's or any third party's confidential information, such as unreported financial information, customer data or personnel matters, when participating in external forums; and
- Be sensitive to situations in which they are identified as Lucent employees and, therefore, may be perceived as speaking on behalf of the company. In these situations, employees should clarify that the views they express are their own and that they are not speaking on behalf of Lucent.

The purpose of these policies is to ensure the accuracy, consistency and completeness of Lucent's public disclosures and to maintain compliance with various regulatory requirements. For more information, see Lucent's *Public Disclosure of Information Policy.*

I have been asked to speak at an industry forum. May I accept the invitation?

You should consult with your supervisor to determine the appropriateness of accepting the invitation and the level of review required for any proposed presentation materials. See the *Public Disclosure of Information Policy* for further guidance.

I have been asked to provide a testimonial for one of my vendor's Web sites. They have also asked me for a quote for a news release. May I participate in these activities?

Always consult your *Public Relations* representative for guidance before agreeing to be quoted. Lucent is selective about such opportunities and protects its reputation by ensuring that quotes are accurate and promote Lucent's business interests. See the *Public Disclosure of Information Policy* for further guidance.

During Work Hours, We Focus on Lucent and Work to Best Represent Lucent

We are honest with our work time because others count on each of us to do our share in making the consistent delivery of superior Lucent products and services the hallmark of our business. We are also constantly aware that, during work hours, we are representatives of Lucent and others will judge our actions as a reflection on Lucent as a whole.

If I have an emergency at home, may I use a company phone to make a personal call?

It is generally acceptable for employees to make and receive important personal calls provided they are infrequent, brief and do not interfere with the normal flow of business activities.

We Report Financial Information Accurately and in a Timely Manner

We make decisions based on financial information recorded at every level of the company and, therefore, every employee is responsible for assuring the accuracy of the financial information that they report. It is critical that Lucent's accounting, financial and other systems provide complete, accurate and timely reporting of transactions. Every accounting or financial record, as well as the underlying support data, must thoroughly and accurately describe the transaction without omission, concealment or falsification of information. In addition, the information must be transferred to the appropriate recipient in a timely fashion. Questions about requirements for financial reporting may be directed to the Lucent *Finance Accounting Policy Organization.*

Accuracy of Public Financial Disclosures

We must make certain that all financial disclosures made by Lucent in all periodic reports and documents filed with government agencies, and other public communications made by Lucent, are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with responsibility for preparing such reports, including drafting, reviewing, and signing or certifying the information they contain. This requires operating in an environment of open communication, while maintaining appropriate proprietary and confidentiality measures.

We must record all information honestly and accurately. This includes, but is not limited to, revenues, expenses and any other financial information. We obtain authorization for, and properly record, all financial transactions and payments. We must comply with corporate accounting methods and cooperate with internal and external auditors.

Contact your operating unit finance support or *Internal Audit* with any questions concerning the proper recording of financial transactions. If you have any other questions or concerns about Lucent's financial disclosures, you should discuss these concerns with your manager, Lucent *Finance* or the *Law Division.*

We Never Enter Into Commitments on Behalf of Lucent Without Proper Authorization

Lucent empowers its employees to enter into different types of commitments on behalf of the company. However, Lucent has adopted detailed guidelines that specify (based on organization and level) which employees are empowered to commit Lucent to specific undertakings. You are responsible for reviewing these guidelines, known as the Lucent *Approval Matrices*, before signing any document on behalf of Lucent. Our suppliers and customers are not required to know if you are authorized to sign a given document.

A supplier wants me to sign an agreement. It is not a significant amount of money. May I sign it?

No. Under Lucent policy, only members of *Supply Chain Networks* (SCN) are authorized to enter into purchase agreements on behalf of Lucent. You should contact your SCN representative for further assistance.

We Maintain Complete and Accurate Records and Retain Records in Accordance With Lucent's Document Retention Guidelines

Accurate and complete records are critical in meeting Lucent's financial, legal and management obligations, as well as in fulfilling our obligations to customers, suppliers, shareowners, employees, government agencies and ministries, and others. Company records include employee and payroll records, vouchers, bills, time reports, billing records, measurement, performance and production records, and other essential data.

To protect company records, you should:

- Prepare records accurately and completely;
- Sign only records that are accurate and complete;
- Retain records, both hard copy and electronic, according to legal requirements and Lucent's *Records Retention Schedule*; and
- Disclose records only as authorized by company policy or as directed by the *Law Division*.

For additional information, see the *Information and Records Management* Web site.

Preserving Lucent's Assets

We Protect Lucent's Physical and Intellectual Property



We Protect Lucent's Intellectual Property Assets

We have an obligation to our shareowners and ourselves to safeguard Lucent's assets. This means that we must protect Lucent's physical property, as well as its less tangible intellectual property assets, such as patents, proprietary information, trade secrets, trademarks, service marks, copyrights and goodwill. In addition, we protect Lucent's intellectual property assets by policing misuse of these assets by others.

Various national laws and international treaties govern how intellectual property rights are created, maintained and protected. In many instances, such as patents, this requires filing documentation with government authorities. The *Intellectual Property* organization can provide you with more information regarding the various forms of intellectual property and the steps you must take to help Lucent establish and protect its rights to its intellectual property.

Lucent owns the intellectual property developed by its employees. In addition to maintaining the confidentiality of such intellectual property, you may not use the intellectual property for non-Lucent purposes without the consent of the *Intellectual Property* organization.

Lucent has established policies for third-party use of Lucent's intellectual property. The Intellectual Property Board of Advisors (IPBA) must approve the transfer of intellectual property rights to third parties and also the right to use Lucent's intellectual property. IPBA approval is also required when Lucent enters into a development agreement with a third party for the right to use the resulting intellectual property. Additional information regarding the *Intellectual Property* organization, including the IPBA, and the approval process can be found on the *Intellectual Property* Web site.

May I sell a product or service I develop on my own time?

Lucent owns any intellectual property created by you during the period of your employment, when the intellectual property is created on Lucent's time or with Lucent's materials, information or facilities. Lucent also owns any intellectual property created by you on your own time, when the intellectual property relates to the actual or anticipated business or research and development of Lucent's products or services. You must obtain a release letter approved by the *Intellectual Property* organization before you begin marketing any product or service that incorporates such intellectual property.

We Safeguard the Confidentiality of Lucent's Proprietary Information

In today's highly competitive global marketplace, protecting Lucent's proprietary information and other intellectual property can mean the difference between success and failure.

Proprietary information is information or knowledge that Lucent has determined should be maintained as confidential and not disclosed outside of Lucent. We protect the proprietary nature of this information, in part, for the following reasons:

- Disclosure could disadvantage Lucent competitively or financially;
- Disclosure could violate the privacy rights of employees, customers, suppliers, joint venture partners or Lucent; and

- The information belongs to others and we have agreed to keep it private. Our customers, suppliers and business partners rely on us to protect their confidential information and intellectual property from being disclosed to anybody without their approval.

When there is a legitimate business need to disclose proprietary information outside of Lucent, or where disclosure is sought by legal process, a nondisclosure agreement should be executed with the third party receiving the information. Contact the *Law Division* for further information regarding nondisclosure agreements.

Proprietary information includes, but is not limited to, information about:

- Lucent's research and development, such as inventions, patent applications (e.g., patents that have not been issued or have not been published), and engineering and laboratory notebooks;
- Employee records and other confidential employee information (e.g., salaries, job assignments and performance appraisal results);
- Confidential manufacturing processes or expertise;
- Business strategies, business results, unannounced products, marketing plans, pricing and financial data;
- Non-public information about products, including hardware and software specifications and designs; and
- Confidential organizational information (e.g., organizational communications, reporting hierarchies, etc.).

Special procedures must be followed when handling proprietary information relating to Lucent's dealings with the U.S. government. For more specific guidance, consult the Lucent *Government Compliance and Integrity Program*.

Do I have to protect proprietary information even after I leave Lucent?

Yes. You are obligated not to use or disclose Lucent's proprietary information even after you have left the company. Contact the *Law Division* for further information.

How can I tell if information is proprietary if it is not so marked?

If information is not marked "proprietary," you must evaluate its proprietary nature on a case-by-case basis. Criteria to consider include the nature, sensitivity and value of the information, as well as its intended audience (e.g., information that is clearly intended for public disclosure as distinct from sensitive marketing data that will be used to develop sales plans).

If you need further guidance, contact Lucent *Security* or the *Law Division*.

We Ensure That Proprietary Information Is Protected From Theft, Unauthorized Disclosure or Inappropriate Use

Always store proprietary information in a safe place and follow security procedures for the computer systems you use. In addition, use common sense to help prevent accidental disclosure of proprietary information. Remember that you can be overheard in public places such as airplanes, elevators and restaurants. Also, don't discuss Lucent's proprietary information with family or friends; they may not understand its significance and could inadvertently pass it to someone who shouldn't have it.

Is the software code on which I am working considered proprietary even though it is still under development?

Yes. Information related to the development of new products, such as software code, is valuable to Lucent, considered proprietary, and must be protected as such.

We Protect the Goodwill Associated With the Lucent Name and Trademark

We use Lucent's trademarks and service marks according to company instructions (see *Trademarks and Service Marks Bulletin*). We protect Lucent's trademark in its name and logo (as well as the names "Bell Labs" and "Bell Laboratories") by using these trademarks or names properly and in accordance with legal and company requirements.

We are careful to ensure that the Lucent name is not used to endorse third-party products and services without authorization. When suppliers request permission to use Lucent's name in advertising or in a news release, the proposed use of the Lucent name should be reviewed for accuracy and for a determination of whether the usage of the Lucent name promotes Lucent's business interests. You should seek prior review and approval of news releases from *Public Relations* and the appropriate level of management within your organization. See the *Public Disclosure of Information Policy* for further guidance.

We Do Not Use Intellectual Property Assets of Third Parties Without Their Authorization

We respect the rights of others concerning their intellectual property assets, such as copyrights, trademarks, service marks, patents and trade secrets. When we need to use the intellectual property assets of others, we obtain the necessary authorization and observe all obligations set forth within the agreements.

Copyrighted Works

We follow all copyright laws. Accordingly, we do not download, reproduce, distribute or alter copyrighted materials from books, trade journals, computer software or magazines. In addition, we do not play audio or video recordings without permission from the copyright owner or its authorized agents. For example, software used in connection with Lucent's business must be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement.

If you need to use copyrighted materials, or otherwise need permission for such use, contact the *Law Division* for further assistance.

One of my colleagues just purchased a new software program that I would like to use. My department cannot afford to buy additional copies right now. May I copy the new software onto another computer?

No. Unauthorized copying of software is a violation of copyright law and of Lucent policy.

We Conduct Our Research in Accordance With the Highest Ethical Standards

Bell Labs strives to preserve, promote and protect the principles of scientific and research integrity. Each member of the Bell Labs community must unequivocally adhere to our *Research Guideposts: Guidelines for Professional Conduct,* which requires the highest ethical standards from all individuals engaged in scientific and technological research.

We Safeguard Lucent's Funds and Property

We are all responsible for safeguarding and making proper and efficient use of company funds and property by following procedures to prevent their loss, theft or unauthorized use. Company funds and property include: company time; cash, checks, drafts and charge cards; land and buildings; records; vehicles; equipment, including fax machines, copiers and telephones; computer hardware and software; e-mail and Internet access; scrap and obsolete equipment; and all other funds and property.

Here are some ways to protect company funds and property:

- Make sure expenditures are for legitimate business purposes and in accordance with company policies;
- Keep accurate and complete records of funds spent; and
- Use corporate charge cards or calling cards only for business purposes or as specified in company instructions. Personal use of a company charge card is grounds for disciplinary action up to and including dismissal.

Actual or suspected loss, damage, misuse, theft, embezzlement or destruction of company funds or property must be reported immediately to the *Compliance Hotline.*

May I take some obsolete equipment home for personal use?

No. Taking company equipment, even if it appears to be obsolete or scrap, is not permitted without written authorization from an appropriate level of management. Any questions should be addressed to Lucent *Security.*

I travel frequently on business and for personal reasons. May I keep non-cash benefits I receive from business travel (e.g., frequent flyer credits) and apply them to my personal travel plans?

Yes. You may keep frequent flyer credits and use them for personal travel. However, you may not influence or change the travel plans made by the company's authorized travel agents to receive these or other similar non-cash promotional benefits. Doing so violates Lucent's policy in two ways. First, you may have a conflict between your personal interests and company requirements to use the lowest logical airfare. Second, you are misusing company funds if your travel is more expensive than it would have been had the designated travel agent arranged the trip.

We Take Appropriate Measures To Safeguard Our Communications

Communication technologies, such as mobile phones, e-mail and instant messaging, have provided us with many new communications options. However, security vulnerabilities of these technologies also pose challenges for Lucent. As a result, we should avoid communicating Lucent's proprietary information over mobile phones in a manner that could be understood or otherwise intercepted by outsiders. Similarly, we should encrypt e-mail that contains proprietary information when it is sent over the Internet (i.e., outside the Lucent firewall) using the latest technology recommended by *Information Technology* (IT).

May I use an external electronic fax service (e.g., E-Fax) to send or receive proprietary information?

No. External electronic fax services represent a risk to Lucent's proprietary information because they have the ability to store the information that is transported in the faxing process. When sending or receiving proprietary information via fax, you must observe the following precautions whenever possible:

- Use Lucent's internal fax capabilities;
- Confirm the correct fax number with the recipient;
- Send faxes to machines that are in controlled locations and confirm the receipt of the fax via telephone call to the intended recipient; and
- Do not send faxes containing proprietary information to hotels, unless it is directly to the recipient's room.

See Lucent's *Business Assurance Instructions* for more information.

We Protect the Security of Lucent's Computer and Network Resources

Computers and network resources and the information they contain are valuable company assets that must be safeguarded. Lucent's security procedures should be followed to protect company computers, networks and the data they contain against unauthorized access, use, modification, disclosure or destruction. Contact *Information Technology* (IT) for additional information about these procedures.

May I disable the automatic software upgrade package on my computer if it is disrupting my work?

No. The software application upgrades that are "pushed" to your desktop via the Systems Management Server (SMS) are critical to the proper operation of the company's computer and network resources and further protect these resources from viruses and occasional security flaws.

We Use Lucent-Provided Internet and E-mail Access Responsibly

Internet access is provided to Lucent's employees for business use. Personal use of these resources must be governed by good judgment and restraint, and must be limited to personal time. Employees should consider the adverse impact on the Lucent network that results from transferring large files during peak use periods.

Lucent limits personal use of company resources if such use interferes with the productivity of individual employees or the overall availability of network and computing resources. If you are unsure whether your Internet usage is appropriate, you should discuss this matter with your supervisor.

Use of these resources, whether in the office or at home, is not private. The company can and will monitor individual use of network services, including visits to specific Web sites, and e-mail. Monitoring of individual usage will extend to individuals using their personal computers to access the Lucent network, for example, through Lucent Remote Access (LRA) or Virtual Private Network (VPN).

May I use my personal e-mail account to send and receive work-related e-mail?

No. External e-mail services often have some measures that help protect against viruses, but Lucent cannot depend on them to protect our proprietary information. Lucent e-mail communications must only be sent or received within the company's e-mail infrastructure to help protect against all kinds of threats, including computer viruses in attachments, worms and unnecessary risk to our information assets.

I just downloaded a software program from the Internet that would be very helpful for my work at Lucent. May I install it on my Lucent-owned computer?

No. Downloading software from the Internet exposes Lucent to the risk of viruses and other malicious code that could affect the integrity and availability of Lucent's systems and networks. All software on Lucent computers must be appropriately authorized, purchased and licensed through the official Lucent purchasing process (see the *Supply Chain Networks* Web site).

We Never Use Lucent's Assets or Resources To Access or Disseminate Inappropriate Information or Material

Lucent's assets and resources, including its computing, telephony, facsimile and networking resources, should never be used to access or disseminate:

- Sexually explicit content;
- Slanderous or libelous content;
- Threatening or harassing messages or chain letters;
- Any information in violation of any laws or Lucent policies; or
- Other content that could reasonably be construed as inappropriate.

Employees who violate this policy will be subject to discipline, up to and including dismissal. If you have a question regarding whether a particular use is permissible, you should check with your supervisor.

The Broader Community

We Give Back to the Communities Where We Live and Work



Lucent Encourages Employees To Participate in Community Activities and Contribute to the Communities Where We Live and Work

Employees should ensure that no conflict of interest, either actual or potential, exists between their Lucent employment and duties in public or civic affairs, whether elective or appointed, paid or voluntary. For example, sometimes employees who perform public service or hold an elected or appointed position are asked to make decisions that might affect Lucent, such as voting on a land use ordinance that involves Lucent real estate. If you find yourself in a similar situation, consult the *Law Division* or, if time does not permit this, abstain from the vote.

All donations on behalf of Lucent, whether in cash or in kind, must be approved by the Lucent Technologies *Foundation* in accordance with the *Charitable Contributions Policy.*

May I use the office copier to make photocopies of a brochure for a charity I support?

You may use the office copier only if the copies are needed as part of a Lucent-supported charitable effort and the content is appropriate and consistent with Lucent's *Values.*

May I donate Lucent office equipment or furniture to a local school or charitable organization?

Contact the Lucent Technologies *Foundation* to determine if the donation and potential recipient are appropriate.

May my operating unit make a charitable contribution in support of the business?

No. All charitable contributions must come from the Lucent Technologies *Foundation* or the corporate contributions program managed by the *Foundation*. This is done to assure that Lucent is following appropriate procedures and making donations to qualified organizations. This is especially important for international contributions. Following this procedure also allows Lucent to maintain information on all contributions for tax and record keeping purposes.

Lucent Generally Does Not Contribute Company Funds or Assets to Political Parties or Candidates for Political Office

In the United States, Lucent does not contribute, directly or indirectly, company funds or assets to political parties or candidates for political office. No employee or agent may offer, make or approve such contributions on behalf of the company. Lucent has established Political Action Committees (PACs), supported by voluntary employee contributions, for making political contributions in the United States. In other countries, no contributions to political parties or candidates for political office may be made on behalf of Lucent unless the contribution is legal under both U.S. and local law, and you have the prior written approval of the *Law Division* and the appropriate level of management.

Employees are prohibited from using their positions with Lucent or Lucent's assets to attempt to influence the personal decisions of others to contribute to or otherwise support political parties or candidates. Lucent's *Government Compliance and Integrity Program* provides further guidance in this area.

Any questions involving political contributions in the United States should be directed to *Global Government Affairs.* You should contact the *Law Division* for guidance concerning contributions to political parties or candidates in other countries.

Compliance With Laws

We Comply With All Legal Requirements



Lucent Complies With the Applicable Legal Requirements of Each Country Where We Do Business and Expects All Employees To Know and Abide by These Requirements

Where local laws differ from the provisions of *Business Guideposts,* local requirements prevail. However, where the provisions of *Business Guideposts* and other company policies are more stringent than, and do not conflict with, applicable local requirements, the provisions of *Business Guideposts* prevail. Although Lucent is sensitive to cultural differences, local custom or practice does not supersede the provisions of *Business Guideposts*.

The determination of which requirements apply in a given circumstance is not always clear. If you have questions in this area, contact the *Law Division*.

Lucent Complies With All Environment, Health and Safety Laws and Regulations in the Countries Where We Conduct Business

Specifically, in the areas of environment, health and safety, Lucent:

- Complies with Lucent environment, health and safety standards;
- Considers environment, health and safety criteria when evaluating projects, products, processes and purchases (including acquisitions and divestitures);
- Protects the environment by conserving resources and by recycling and reusing materials; and
- Designs and manufactures products that are safe to use and meet or exceed all applicable government standards and regulations.

If you have questions, contact Lucent *Environment, Health and Safety*.

Lucent Complies With Applicable Export/Import Rules and Regulations in the Countries Where We Conduct Business

International trade laws control the movement of products, services and technology (e.g., technical data) around the world. Lucent complies with U.S.-sanctioned laws and regulations, and all applicable export and import laws, in the countries where we do business. By addressing trade compliance issues early in the business cycle, Lucent ensures its reputation as a reliable vendor, reduces costs and avoids possible shipping delays, fines and penalties.

Exports

Lucent ensures that all export transactions are authorized under the applicable laws of the appropriate country or countries. "Export transactions" include:

- Physical shipments of hardware, software or technology (including those carried by hand);
- Electronic transmissions of software or technology; and
- Disclosures of technology in another country (including disclosures to Lucent employees).

In addition, disclosing technology in the United States to any person (including a Lucent employee) who is not a U.S. citizen or permanent resident alien is an export transaction. When necessary, Lucent must obtain export licenses from the appropriate government(s) for export transactions.

Imports

Lucent ensures that its products are imported in accordance with the applicable laws of the importing country. Each Lucent operation should be fully aware of the laws of the countries into which it imports products, as well as any U.S. export/import restrictions applicable to those countries. Typically, under these laws, imported goods must be accurately described, classified and valued, and their country of origin must be declared.

Questions about U.S. export and import control laws may be directed to the *Global Tax & Trade* organization.

I've been invited to speak at a conference in a country where Lucent does not do business. What should I do?

Consult with the *Law Division* to be sure your participation does not violate the trade laws of that country or of the United States.

We Will Not Violate Applicable Anti-Boycott Laws

United States anti-boycott laws govern Lucent's conduct when Lucent is confronted with an economic boycott request. These laws provide that Lucent may not:

- Refuse or agree to refuse to do business with a boycotted country, its nationals or blacklisted companies;
- Discriminate or agree to discriminate against individuals or companies on the basis of race, religion, sex, national origin or nationality;
- Furnish or agree to furnish information, directly or indirectly, about any person's race, religion, sex, national origin or membership in or support of charitable or fraternal organizations supporting a boycotted country;
- Furnish information about Lucent's or any person's past, present or prospective relationship with boycotted countries, nationals of boycotted countries or blacklisted companies; and
- Pay, honor, negotiate or implement letters of credit containing prohibited boycott provisions.

In addition, Lucent must report to the U.S. government any oral or written request to participate in or support an economic boycott not sanctioned by the government. Violation of this U.S. law by Lucent employees outside the United States could still result in liability to Lucent.

If you learn of a boycott request or if you are asked to participate in a boycott in any country, you should consult with the *Law Division* immediately.

Lucent Complies With Applicable Anti-Corruption Laws in the Countries Where We Conduct Business

Lucent complies with applicable anti-corruption laws and regulations that govern our business activities around the world. Lucent's policies and procedures in this area are provided in the sections entitled "Our Customers" and "Our Suppliers."

Managing Compliance With *Business Guideposts*

We Are Accountable for Ethics and Compliance



All Lucent Employees Are Leaders in Understanding and Complying With *Business Guideposts*

At Lucent, every employee has a personal responsibility to know and comply with legal requirements and company policies and procedures. Each of us has an obligation to demonstrate, through words and actions, our personal commitment to the highest standards of business ethics and personal integrity. *Business Guideposts* applies to all Lucent employees and Board members. It affirms our commitment to the highest standards of integrity in our relationships with one another and customers, suppliers, business partners, shareowners and others in the communities where we live and work.

Each employee is expected to read *Business Guideposts* carefully and comply with its principles in carrying out all business activities. Lucent has a formal process to facilitate periodic review of *Business Guideposts* for all existing employees and upon hire for new employees. The *Office of Business Conduct* will inform all employees of their responsibility to complete this requirement.

Supervisors have an additional responsibility to:

- Maintain an environment of open communication where Lucent's *Values*, *Business Guideposts* and related policies and instructions are shared, discussed and even debated;
- Ensure that their people understand Lucent's *Values* and the provisions of *Business Guideposts* and give them additional training, when appropriate;
- Take reasonable steps to ensure that unethical or illegal conduct within their areas of responsibility is detected and addressed; and
- Consider whether a person demonstrates Lucent's *Values* before placing him or her in a position of responsibility.

Lucent has established a management structure for oversight of the company's ethics and compliance program. Operating unit leaders are responsible for establishing, implementing and maintaining an effective ethics and compliance program within their organizations, including a system of internal controls, to ensure that their employees comply with all laws, regulations and provisions of *Business Guideposts* that affect the business.

What should I do if I feel that my supervisor asks me to act in a manner that I believe may be contrary to applicable legal requirements or company policies?

Ultimately, you are responsible for your own conduct. No employee should ever commit dishonest, destructive or illegal acts, even if directed to do so by a supervisor or colleague, nor should we direct others to act improperly. If you believe you are being asked to do something illegal or unethical, you should contact another member of management with whom you feel comfortable, the *Compliance Hotline* or the *Law Division*.

If my operating unit has a rule or policy that imposes more stringent requirements than those established in Business Guideposts, which do I follow?

You should follow your operating unit's rule or policy, provided the rule or policy does not conflict with the standards established in *Business Guideposts*.

Reporting Improper Conduct

We are each responsible for contacting the *Compliance Hotline* immediately if we suspect, observe or learn of unethical business conduct or the commission of any dishonest, destructive or illegal act. Ignoring or remaining silent about such conduct or acts is not acceptable.

In addition, employees can use the *Compliance Hotline* to report accounting, internal accounting controls or auditing matters, including any questionable accounting or auditing practices. *Internal Audit*, the *Law Division* and the chairman of the Audit and Finance Committee of the Lucent Board of Directors will receive and review reports of these incidents.

Reports can be filed anonymously and the identity of those who report will be protected to the extent consistent with law and Lucent policy. Lucent will investigate all reports, including those made anonymously, and provide feedback when appropriate. Employees may report on a confidential or anonymous basis, 24 hours a day, seven days a week.

Retaliation Is Prohibited

It is a violation of company policy to retaliate against or take other adverse actions against those who report, in good faith, suspected violations of law or policy. Any employee who believes that they have been subject to retaliation should report the issue to the *Compliance Hotline* immediately.

Consequences of Violating *Business Guideposts*

Lucent is committed to the highest levels of business ethics, personal integrity and compliance in all aspects of its business. Employees who do not comply with the provisions of *Business Guideposts*, other company policies and/or applicable laws may be subject to disciplinary action up to and including dismissal. Additionally, certain kinds of conduct can lead to criminal and/or civil liability.

Business Guideposts Cannot Cover Everything – Lucent Relies on Your Sound Judgment

There will be times when *Business Guideposts* will not address the specifics of your situation. When this occurs, you might find it helpful to consider the following:

- Other Written Policies and Guidelines: What written policies and instructions should be consulted? For example, how can Lucent's *Policies* and the *Employment Policy Guide* be helpful?
- People Available to Assist You: Who should be consulted? Your supervisor; Lucent *Security; Law Division; Human Resources; Office of Business Conduct;* subject matter experts? Others?
- Ethical Impact: What are the possible ethical choices and the rationale for each?
- Alternatives That Would Not Violate Lucent's *Values*: Is there any room for compromise that would not violate Lucent's *Values* or the provisions of *Business Guideposts*?

- Consider the Possible Outcomes: Who could be hurt or helped by your decision? To what extent could they be hurt? How might they be helped? Of the choices identified, which do the most to reduce harm? Which do the most to provide help? Which are most aligned with *Business Guideposts*? Which do the most to respect the rights of those involved?
- Make Sure You Are Comfortable With Your Decisions: Will my decision seem like the right one a year from now? Five years from now? Ten years from now? Would I be comfortable telling my supervisor, colleagues, my organization's leadership team, the chairman and Lucent shareowners? What about telling my family and friends about my decision? Could I testify about my decision in a court of law and not expose Lucent or myself to liability? How would I feel if my decision were made public through newspapers or television?

Business Guideposts: Important Considerations

All Lucent employees are expected to comply with the provisions of *Business Guideposts.*

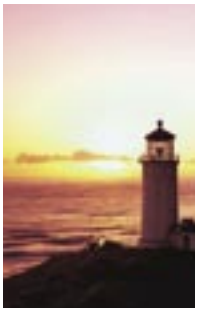
For employees working in the United States, and for U.S.-outbound international assignees (IAs), *Business Guideposts* does not create any contractual rights of any kind between Lucent and its employees or between Lucent and third parties. Employees who are not covered by a collective bargaining agreement are employed by Lucent on an "at-will" basis. This means that both Lucent and the employee can terminate the employment relationship at any time and for any reason.

Employees working outside the United States (except U.S.-outbound IAs) who are not covered by a collective bargaining agreement or a written employment contract, also are employed on an "at-will" basis. In countries or jurisdictions outside the United States where a collective bargaining agreement or a written employment contract applies, the provisions of *Business Guideposts* are included as an integral part of the employment relationship and all employees are expected to comply with *Business Guideposts'* terms.

Conclusion

Business Guideposts reflects Lucent's fundamental and guiding principles. To ensure Lucent's continued success, each of us, working together, must continue to establish and meet the highest standards of business ethics and personal integrity in all that we do.

Quick Reference Guide



Anti-Corruption – Foreign Corrupt Practices Act

http://quickplace1.web.lucent.com/quickplace/fcpa/main.nsf

Approval Matrices

http://mylucent.web.lucent.com/finance/policies

Click "Lucent Approval Matrices"

Audit/Sarbanes-Oxley

1-888-267-7732 (inside the United States)

+1-908-582-0183 (outside the United States)

+1-503-249-0343 (Text Telephone for Hearing Impaired)

To report via the Web:

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=478

To report via the mail:

P.O. Box 953, Murray Hill, New Jersey 07974-0953 USA

For more information:

http://quickplace.web.lucent.com/quickplace/ku-barms/main.nsf

Click "Internal Audit"

Business Assurance Instructions

http://my.lucent.com/security

Click "Security Policies"

Charitable Contributions Policy

http://my.lucent.com/foundation

Click "Lucent Charitable Contributions Policy"

Compliance Hotline

1-888-267-7732 (inside the United States)

+1-908-582-0183 (outside the United States)

+1-503-249-0343 (Text Telephone for Hearing Impaired)

To report via the Web:

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=478

Conflict of Interest Disclosure Process

http://my.lucent.com/obc

Click "Conflict of Interest"

Employment Policy Guide

http://my.lucent.com/hr (Under "Quick Links," select "Employment Policies")

Environment, Health and Safety

1-800-447-2338 (United States and Canada)

1-800-447-2338 (Mexico – first dial access code: 01-800-288-2872)

+1-941-649-3087 (All Other Locations)

http://lehs.wh.lucent.com/newsite

Equal Opportunity/Affirmative Action/Human Rights

1-888-267-7732 (inside the United States)

+1-908-582-0183 (outside the United States)

1-888-807-0809 (Text Telephone for Hearing Impaired)

To report via the Web:

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=478

Equal Opportunity Policy

http://ion.hr.lucent.com/diversity/equal/policies.htm

Finance

http://my.lucent.com/finance

Finance Accounting Policy Organization

http://mylucent.web.lucent.com/finance/policies

Financial Code of Ethics

http://www.lucent.com/investor/governance

Click "Code of Ethics for our CEO, CFO and Controller"

Foundation

http://my.lucent.com/foundation

Global Government Affairs

http://my.lucent.com/gga

Global Tax & Trade

http://my.lucent.com/finance

Click "Global Tax and Trade"

Government Compliance and Integrity Program

http://my.lucent.com/obc

Click "Compliance Programs"

Click "Government Contracting"

Click "Government Compliance and Integrity Program"

Health Services

http://healthservices.web.lucent.com

Human Resources

http://my.lucent.com/hr

Human Rights Policy

http://my.lucent.com/hr

Under "Quick Links," select "Employment Policies," click "Go"

Click "Continue"

Click "Global Human Rights Statement"

Information and Records Management

http://records.lucent.com

Information Technology

http://my.lucent.com/it

Intellectual Property

http://my.lucent.com/ipb

Investor Relations

http://www.lucent.com/investor

Law Division

http://my.lucent.com/law

Office of Business Conduct

http://my.lucent.com/obc

Policies

http://my.lucent.com/obc

Click "Company Policies"

Public Disclosure of Information Policy

http://prweb.lucent.com/org/mediarelationspolicy.doc

Public Relations

http://prweb.lucent.com

Records Retention Schedule

http://records.lucent.com

Research Guideposts: Guidelines for Professional Conduct

http://my.lucent.com/bell-labs

Select "Research Policies and Procedures"

Click "Research Guideposts: Guidelines for Professional Conduct"

Security

1-888-267-7732 (within the United States)

+1-908-582-0183 (outside the United States)

To report via the Web:

https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=478

For more information:

http://my.lucent.com/security

Sourcing Policy

http://my.lucent.com/scn

Click "On-line Resources and Tools"

Click "Sourcing Strategy Tools"

Stock Trading Policy

http://my.lucent.com/obc

Click "Company Policies"

Click "Lucent Stock Trading Policy"

Supply Chain Networks

http://my.lucent.com/scn

Trademarks and Service Marks Bulletin

http://www.lucent.com/trademarks

Travel Policy

http://www.travel.lucent.com

Values

http://my.lucent.com/obc

Click "Lucent's Values"

Ordering Information

The ordering number for this document is 010–311–240.

To order this or any other Lucent Technologies document, call the Customer Information Center (CIC) at 1-888-LUCENT8, Canada: +1-317-322-6616, All Others: +1-317-322-6416. Or visit the CIC Web site at http://www.cic.lucent.com

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