

Vendor Code of Conduct

Integrity is a core tenant of the Spok Holdings, Inc. (“Spok”) culture and we hold ourselves to the highest ethical standards. We expect our vendors, suppliers, distributors, partners, business associates, and third-party representatives (“Vendors”) to uphold these standards.

This Vendor Code of Conduct (“Code”) sets forth Spok’s expectation that its Vendors will conduct business fairly and ethically, comply with anti-corruption laws domestically and around the world, cooperate with our requests for information, avoid engaging in any activity that involves even the appearance of conflict of interest or impropriety, and adhere to all applicable laws and regulations. These expectations should complement each Vendor’s own company policies, applicable legal requirements, and the terms of any agreements that a Vendor may have with Spok. Failure to comply with this Code could result in termination of the business relationship.

Spok encourages Vendors to raise questions or concerns about this Code to their Spok point of contact.

I. COMPLIANCE WITH APPLICABLE LAWS, RULES, AND REGULATIONS

Spok expects its Vendors to comply with both the letter and the spirit of all laws, rules and regulations that apply to the Vendor’s business, particularly those related to Vendor’s performance of duties for Spok. These include, without limitation, laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets.

II. ANTI-CORRUPTION COMPLIANCE AND GOVERNMENT INTERACTIONS

Spok prohibits bribes, kickbacks, or other improper or illegal payments of anything of value from being directly or indirectly offered, given, authorized, promised, solicited, or accepted in any way related to Spok, whether it involves public officials (including officers or employees of governments or state-owned entities) or private parties. Vendors may not offer, pay, promise, authorize, request or receive any bribe, kickback or other illicit payment or benefit in any way related to Spok’s business.

Spok also prohibits Vendors from making facilitation payments, or small, unofficial payments to public officials to expedite routine, non-discretionary government decisions (even if permissible under local law).

Spok expects its Vendors to interact with governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including any special requirements that apply to government contracts and government transactions.



III. GIFTS & ENTERTAINMENT

If gifts and entertainment are permissible under a Vendor's agreement with Spok, Vendors may only give or receive gifts if they will not be viewed as an inducement to or reward for any particular business decision. Gifts should be consistent with customary business practices and should not violate any applicable laws or regulations, or any contractual agreements with Spok. All gifts and entertainment expenses related to Spok should be properly accounted for, with the recipients and attendees detailed.

IV. EXPORT, CUSTOMS, TRADE CONTROL, AND ANTI-MONEY LAUNDERING

Spok expects its Vendors to comply with all applicable export, customs, and trade control laws and regulations, including economic and trade sanctions laws, antiboycott laws, and any related licensing requirements. Vendors are prohibited from dealings or transactions involving U.S. sanctioned persons or sanctioned countries in any way related to Spok's business. Spok also expects its Vendors to comply with all applicable anti-money laundering laws and regulations.

V. CONFLICTS OF INTEREST & CORPORATE OPPORTUNITIES

Vendors must avoid engaging in any activity that involves even the appearance of an actual or potential business or financial conflict of interest involving Spok – i.e., instances where the Vendor's personal interests (including interests of the Vendor itself or the Vendor's employees, officers, or directors) compete with the Vendor's obligations to serve the interests of Spok. Spok expects Vendors to disclose any situations that reasonably would be expected to give rise to a conflict of interest with Spok.

Vendors are prohibited from directly or indirectly using Spok property, information, or their role as a Spok Vendor to (i) obtain personal gain or (ii) compete with Spok.

VI. INSIDER TRADING

Vendors are prohibited from trading shares of Spok stock or other securities of Spok while in possession of material, nonpublic information about the Spok. Vendors are also prohibited from recommending or suggesting (*i.e.*, "tipping") that anyone else trade in Spok stock or securities on the basis of such information.

Similarly, Vendors who obtain material nonpublic information about another company in the course of their services to Spok are prohibited from trading in the common stock or securities of the other company while in possession of such information or tipping others to trade on the basis of such information.



VII. ANTITRUST, COMPETITION, AND FAIR DEALING

Spok expects its Vendors to comply with applicable antitrust and competition laws designed to promote fair and open competition, particularly as it relates to Spok. Vendors must not directly or indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or customers, eliminates competition or otherwise unreasonably restrains trade.

Vendors must endeavor to deal fairly with Spok and with Spok's customers, suppliers and competitors. Vendors should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

VIII. RECORD MANAGEMENT AND RECORDING TRANSACTIONS

Accurate and reliable records are crucial to Spok's business. All Vendor books records related to Spok must be complete, accurate and reliable in all material respects. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited.

IX. CONFIDENTIAL INFORMATION

We expect our Vendors to safeguard and protect Spok's confidential information, as well as the confidential information of Spok's customers, suppliers, shareholders, employees, or other third parties, except when disclosure is authorized or legally mandated.

Confidential information includes intellectual property, financial information, business plans, operational information, technical data, client information and/or medical information, and all non-public information about Spok products and services that might be of use to competitors. Confidential information also includes proprietary information including intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, customer and employee account information, salary information and any unpublished financial data and reports.

X. DATA PRIVACY

Vendors must comply with all applicable laws and regulations regarding the protection of personal information or other sensitive or protected information and assist Spok in complying with its own obligations in this regard.

XI. HUMAN RIGHTS, CHILD LABOR, AND HARASSMENT

We condemn forced labor and human trafficking and will not work with suppliers who engage in these practices. We expect our Vendors to comply with all applicable human rights laws prohibiting child,



forced, indentured, or involuntary labor. We prohibit Vendors for engaging underage labor and will not work with suppliers that utilize underage workers, including any individual younger than the local minimum working age or the age of 15, whichever is older according to guidance provided by the International Labor Organization.

Spok expects its Vendors to conduct themselves in a professional manner with courtesy and respect for others. We do not tolerate harassment or abuse, or threats of such abuse or other intimidation, by our Vendors in any form, including verbal, physical, or sexual harassment consistent with all applicable laws and guidance from the Freedom of Association.

XII. DIVERSITY AND INCLUSION & NON-DISCRIMINATION

Inclusion, equality, and diversity are critical to Spok, and we are committed to providing equal opportunities in employment, development, and advancement for all qualified persons, including in our Vendor relationships. Spok expects its Vendors to share this commitment and does not tolerate illegal discrimination by its Vendors. Vendors must engage in discrimination in hiring, compensation, access to training, promotion, termination, or other employment decisions based on any protected class, including discrimination based on race, color, sex, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or veteran status.

We expect our Vendors to achieve strict compliance with all regulatory agency requirements as well as with federal, state, and local procurement regulations, initiatives, and programs related to diversity and inclusion, and we encourage our Vendors to actively promote diversity and inclusion in their workplace.

XIII. CONFLICT MINERALS

We expect our Vendors to engage in conflict free sourcing of conflict minerals, including (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

We require our Vendors to comply with all policies or procedure issued by Spok related to conflict minerals.

XIV. ENVIRONMENT, SAFETY, AND HEALTH

Spok is committed to the protection of the environment and operating its business in an environmentally sustainable manner. Aligning with our vision to improve patients' lives, we recognize the importance of environmental sustainability. Spok expects its Vendors to operate in a manner protective of human health, safety, and the environment, especially as it relates to their work with Spok. We encourage our



Vendors to embrace resource recycling, sustainability, and environmental restoration; seek opportunities to eliminate waste and replace inefficiencies with sustainable processes; and reduce wasteful paper in favor of digital or online storage methods.

We choose to work only with Vendors that conduct business in a manner that protects the health and safety of employees, visitors, contractors, and the public. Spok expects its Vendors to comply with both the letter and the spirit of applicable occupational health and safety laws and regulations, and adhere to company policy on OH&S, as well as applicable environmental laws and regulations, including obtaining and maintaining all required permits, regulatory approvals, or registrations.

XV. USE AND PROTECTION OF SPOK CORPORATE ASSETS

If provided with Spok assets (including technology, software, proprietary information, or other physical assets), Vendors may not use such funds or assets, whether or not for personal gain, for any unlawful or improper purpose. Vendors should protect Spok's assets and ensure their efficient use for legitimate business purposes only.

Additional information about Spok's commitment to corporate and social responsibility can be found at <https://www.spok.com/meet-spok/corporate-and-social-responsibility/>. Our Code of Business Conduct and Ethics is available at <http://cloud.spok.com/IR-Code-of-Business-Conduct-and-Ethics.pdf>.

Please contact your Spok contact if you have any questions about this Code or Spok's ethics and compliance expectations. You may also report non-compliance with this Code, violations of law, or unethical behavior by visiting www.ethicspoint.com or by calling (888) 353-5701