

Verizon 2023 Saliency Assessment

Executive Summary

Introduction Verizon Communications, Inc. (“Verizon”) is one of the world’s leading providers of communications and technology products and services to consumers, businesses and governmental agencies. The company’s customers range from individual wireless consumers in the United States to global multinational enterprises.

Verizon is committed to operating with respect for internationally recognized human rights, as set forth in its Human Rights Statement. Verizon’s human rights policies and programs are foundational to its ESG management strategy.

Background to the 2023 Saliency Assessment

In 2021, Verizon undertook its first enterprise-wide human rights saliency assessment. Article One, a business and human rights consultancy, was engaged to conduct the assessment. Once concluded, the assessment affirmed and expanded upon the focus areas of Verizon’s human rights work, namely the right to privacy, the right to be free from discrimination, the right to freedom of expression and opinion, and rights in the workplace and supply chain. In its final report, Article One made several recommendations intended to support Verizon in managing its salient human rights issues. These recommendations included: continuing to strengthen and invest in robust governance and oversight of human rights; assessing opportunities to embed human rights due diligence efforts into more functions over time; and considering opportunities to strengthen access to remedy.

Verizon’s Business & Human Rights Program (“BHRP”) has taken a number of specific actions consistent with the recommendations set forth in the 2021 assessment, including: updating Verizon’s Human Rights Statement; supporting the development of AI governance processes that address Verizon’s salient issues, including the right to be free from discrimination; further integrating human rights principles into Verizon’s work on digital safety; and reviewing product-specific communications channels through which stakeholders may raise issues related to the human rights impacts of Verizon’s activities.

Methodology In 2023, Verizon undertook a saliency assessment refresh that considered both changes to its business and the impacts of external trends. Article One was engaged to conduct the refresh of the 2021 assessment, which was informed by desktop research, internal Verizon documents, and interviews with internal stakeholders. Article One also engaged with external stakeholders representing civil society, academia, international organizations, consumers, and local communities. As part of the external stakeholder engagement efforts, the BHRP and Article One partnered with Verizon’s State Government Affairs Community Engagement team to conduct

13 listening dialogues in English, and one national Spanish-language dialogue, that engaged a total of over 100 participants from across the United States. A national survey on human rights and ESG topics was also conducted, in part to collect feedback from hard-to-reach populations, including communities in rural areas and tribal lands. This survey received 113 responses from across 26 states.

Salient Human Rights Issues and Opportunities

The assessors identified the human rights issues set forth below as most salient for Verizon, given the nature of its operations and the key stakeholder groups that may be affected by Verizon’s activities: consumers and end users, employees and contractors, workers in the supply chain, and local communities. For each of the below salient issues, the assessors noted that Verizon has existing governance processes in place to assess and manage risk, while also identifying recommendations to continue to strengthen Verizon’s approach to human rights governance.

- *Right to Privacy* - The products and services that Verizon offers require the processing of data, including personal information. Verizon strives to offer products and services that meet changing consumer demands and are on the forefront of technological developments. For example, the development and use of new and emerging technologies such as 5G, IoT, AR/VR, and AI may generate new considerations regarding privacy impacts.

Verizon seeks to operate with respect for individuals’ right to privacy. We endeavor to communicate transparently on privacy matters, respect individuals’ choices about the use of personal data, and prioritize protecting the security of our systems and networks.

- *Right to be Free from Discrimination* - Verizon’s policies and practices related to non-discrimination and equality impact its employees and contractors, customers, and society more broadly. Verizon also assesses and manages questions regarding unfair bias in the context of the design and/or deployment of AI-enabled applications and systems.

Verizon seeks to operate with respect for the right to non-discrimination. The company is committed to fostering an inclusive and harassment-free working environment, and celebrates diversity across all spectrums. In technology design and use, Verizon evaluates and addresses the risks of potential biases to prevent discriminatory outcomes and takes steps to ensure that technology delivers benefits to all, including vulnerable and marginalized groups. Verizon also aims to address barriers to, and enable, connectivity for those who need it most.

- *Right to Freedom of Expression and Opinion* - Verizon’s customers produce, store, and share content using Verizon products and services. The policies

that we set and implement, as well as disruptions to Verizon's services due to natural disasters or man-made attacks, can impact our customers' and local communities' ability to express, receive, and impart information.

Verizon seeks to operate with respect for the right to freedom of expression and information, and recognizes that our network and technologies play an important role in enabling this right for our customers. Diverse parts of the company, ranging from our legal and policy teams to our network engineers, have a role to play in these efforts.

- *Rights in the Workplace* - Verizon is a large employer and its workplace policies and practices may impact a range of human rights related to working conditions and conditions of employment.

Verizon seeks to operate with respect for the rights of our workers, which includes treating employees and contractors with respect and dignity and providing employees with a safe and healthy workplace.

- *Rights in the Supply Chain* - Verizon works with diverse suppliers in an extended supply chain. Suppliers' workplace policies and practices may impact a range of human rights related to working conditions and conditions of employment. Given the company's dependence on equipment manufacturers, forced labor and child labor are risks in Verizon's supply chain.

Verizon expects suppliers to respect workers' human rights, maintain a safe and healthy workplace, and take steps to mitigate potential risks of forced labor, child labor, and other human rights violations.

Beyond identification of Verizon's most salient human rights issues, the assessors also identified opportunities for Verizon to integrate greater attention to human rights in the company's efforts to respect and support the right to a clean, healthy, and sustainable environment, including efforts to address climate-related risks.

Community Perspectives on Salient Issues and Opportunities

During the community dialogue sessions that were held as part of the assessment, community representatives emphasized the importance of connectivity for the rights to education, work, and participation in public life. Community representatives noted potential ways that Verizon could deepen its existing efforts to promote access to connectivity and support the development of digital literacy, which representatives viewed as essential to enable individuals and organizations to benefit from connectivity. Communities of color, people with disabilities, youth, seniors, formerly incarcerated individuals, unhoused individuals, and low-income communities were noted as highest-need populations for technology access and training.

Recommendations The 2023 refresh of Verizon's 2021 saliency assessment affirmed and expanded the areas of focus for Verizon's human rights efforts and will provide a strong foundation for the company's human rights efforts going forward. The saliency assessment also complemented and informed a parallel ESG prioritization assessment conducted by Verizon's wider ESG team (for more information, see Verizon's [2023 ESG Report](#)).

Article One made several recommendations regarding the continued management of Verizon's salient human rights issues. Some of the key recommendations from the assessment included:

- Continue to strengthen and invest in robust governance and oversight of human rights and salient issues. This includes for instance, supporting human rights reviews of AI use cases, including to address potential impacts on the right to be free from discrimination.
- Deepen and continue collaboration with internal teams to further integrate human rights commitments, including those related to rights in the workplace, into relevant Verizon functions, policies, and practices.
- Continue and deepen collaboration with internal teams to further assess areas of potential human rights risk in the supply chain, conduct human rights due diligence, and engage with suppliers.

Next Steps The BHRP will use the findings and the recommendations to inform its work going forward. Examples of efforts already underway include:

- Engagement with relevant cross-functional teams to consider the relevance of the identified salient risks to mandatory reporting obligations.
- Continued collaboration with the Responsible AI team to support implementation of Verizon's Responsible AI Principles, which include "Respect for Human Rights & Responsibility to Society."
- Strengthened collaboration with relevant teams to assess and address potential human rights risks in the workplace.
- Regular consultations with colleagues in sourcing, supply chain, and sustainability roles to consider how to best strengthen and support ongoing due diligence on suppliers.