



# CORPORATE

## responsibility report

2024

**viapath**  
TECHNOLOGIES

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# Message From the CEO

At ViaPath Technologies, our mission is focused on transforming the lives of incarcerated individuals and their family and friends through impactful communications and successful reintegration while enabling our corrections partners to develop safer and more secure environments.

As we navigate through an ever-changing landscape, it is imperative to reflect upon our progress and set the course for the years to come. This report is a testament to the hard work and dedication of our entire team, whose unwavering commitment to innovation, excellence, and sustainability has allowed us to reach and exceed our goals.

Consistent with our mission and desire to ensure communication is affordable and accessible to all, we have been working on reducing rates for the past several years while ensuring quality services and continuing to develop innovative solutions. In partnership with our client organizations, we will work to maintain quality of service, and also expand communication, education and entertainment options to better serve their incarcerated populations.

This report highlights the key milestones that define our path and outlines the roadmap for our continued growth and success. We have made significant strides in expanding our market presence, enhancing our product offerings, and fostering a culture of inclusivity and collaboration.

As you delve into the pages of this report, you will gain insight into our core values, our mission, and the driving forces behind our success. We are committed to delivering exceptional value to our customers, partners, and shareholders while maintaining our responsibility towards societal impact to improve outcomes for the incarcerated.

I would like to extend my heartfelt gratitude to our employees, whose passion and perseverance are the bedrock of our achievements. I also want to thank our customers and partners for their unwavering trust and support. Together, we are building a legacy of excellence and innovation.

In conclusion, the ViaPath Report is not just a record of our past Corporate Responsibility accomplishments but a blueprint for a promising future. We remain steadfast in our pursuit of excellence and are excited about the opportunities that lie ahead.

Thank you for your continued faith in our vision and our capabilities.

**Take care,**



**Deb Alderson, CEO**  
**ViaPath Technologies**



# COMPANY

# OVERVIEW





**ViaPath Technologies is the leading global technology company that provides advanced communications, education, and technology solutions to current and formerly incarcerated individuals, their support networks, and correctional facilities.** Our programs and products help deliver the meaningful connections and educational opportunities that create pathways to successful reintegration.

Our company **works across more than 2,000 correctional facilities and prison systems in North America, the United Kingdom, and Australia.** We offer a wide range of tools to meet the unique needs of incarcerated populations, friends and family, and corrections officers. Our stakeholders always come first and count on us to deliver secure, state-of-the-art solutions in technology, education, rehabilitation, payments, and intelligence.

ViaPath is headquartered in Falls Church, Virginia, and deploys a workforce of more than 1,300 employees across North America. Our commitment to customer experience is the hallmark of our success, and the backbone of our ability to attract talent, build our brand, and advance new services.



OUR

SOLUTIONS





Our products and services are aligned to further our mission of breaking the cycle of incarceration. Research tells us, and we have seen in our own experience, the value of supportive networks in successfully reintegrating returning citizens.

ViaPath provides communications, entertainment, and education solutions to justice-involved people and their friends and family. We know that staying connected to the outside world helps the rehabilitation process and promotes positive outcomes. Connecting individuals to their communities is key to successful reintegration.

These virtual interactions offer an unprecedented level of accessibility, which benefits the incarcerated and enhances connections with their support networks.

## Education

Since the beginning of our education program, ViaPath tablets have enabled more than 25 million hours of education programming supporting high school equivalency, programs required by sentencing boards, vocational certifications, secondary education, post-secondary education, and life skills training.

### Each day, ViaPath Technologies facilitates more than:



**On average, incarcerated individuals who participated in education programs while incarcerated were 43% less likely to recidivate than those who did not. They also had a 13% higher chance of obtaining employment post-release than those who did not.**

Drawing on our experience supporting incarcerated people and the knowledge of education experts in the field, we developed Empowering Futures. This is the ViaPath platform that provides access to a wealth of specifically curated education, rehabilitation,

reentry, and reintegration content and services via ViaPath tablets.

ViaPath's Empowering Futures reach has grown to include more than 700 facilities with no cost educational content, with an additional 300 sites expected to be added before the end of 2024.



**25,846,522 hours**  
of learning and self-  
improvement opportunities



**11,009,531**  
completed certificates



**1,186,832**  
unique learners

## Operations

We offer management and intelligence solutions to facilities to help promote the safety and well-being of the incarcerated population, the staff, and involved communities. ViaPath promotes open lines of communication between justice-involved people at all stages, correctional staff, community connections, family, and friends.

Secure digital tablets permit incarcerated individuals to participate in reintegration programs on a flexible schedule and according to their specific needs and competency level. They gain technology skills while focusing on key areas that reduce reoffending and better prepare them for release.

Our partner facilities tell us that ViaPath programs improve facility culture beyond the educational benefits.

- Relieve staffing shortages
- Increase security
- Reduce depression and behavior issues

## Payments

Outside of corrections, ViaPath Financial Services helps state and local governments streamline payment processing. Through our subsidiary, our licensed or authorized money transmitter partners in all 50 states, the District of Columbia and Puerto Rico, we are a trusted partner for agencies working to improve child support services, and ensuring custodial parents and their children receive support in a timely manner.





## Stakeholder Engagement

At ViaPath, we are devoted to the full spectrum of our stakeholders. We serve employees, justice-involved individuals, their friends and family, the staff and leadership of correctional facilities, and regulators. Creating impactful connections and providing industry-leading service remains our top priority.

Supporting friends and family is an important part of breaking the cycle of incarceration. We work hard to keep communications options up, and costs down for incarcerated individuals and their friends and family.

ViaPath's compassion for friends and family shows in the many

options we provide to stay in touch with an incarcerated loved one. These include standard phone calls, text-like digital messaging which includes sending photos, short video clips or e-cards, and video visits. We also offer a free weekly communication option to all justice-involved individuals, based on local facility guidelines.

Our solutions are engineered to provide correctional facilities of all sizes with enhanced levels of efficiency and greater control and care for the population they serve. This safer environment also benefits the staff in our partner facilities. By balancing efficiency, control and safety, we help corrections agencies and facilities create the optimal atmosphere for positive outcomes.



“We have learned how well [the tablet] works and how efficient it works to keep not just my inmates safe, but my team safe. I **believe that this tablet has been a way to make our jobs that much easier, that much safer. It’s also made it that much easier and safer for our inmates and their families to communicate, to work together....**I think our role as corrections officers is to understand that they too have a need to stay connected with the community.”

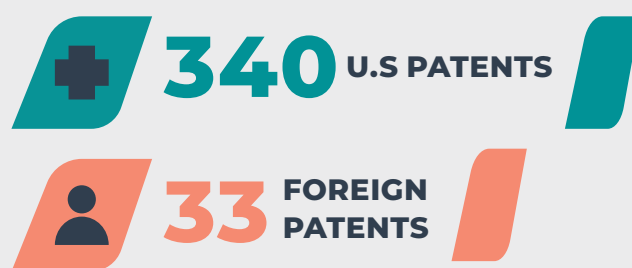
Regulators are also key stakeholders. Our business is regulated in several ways. Our services, delivery models and prices are all subject to regulation in different forms, and at various levels of government. The entities that shape those policies are key arbiters of our markets, and we work diligently with them to continue to meet the needs of the corrections community.

## Innovation

Innovation drives access to services and technology in our industry. Our investment in research and development (R&D) remains among

the highest in our sector. We secure intellectual property rights to protect significant innovations in technology and product advancement, while remaining focused on our mission to help break the cycle of incarceration.

Our industry-leading patent portfolio is comprised of:



This robust portfolio covers innovations in communications, wireless, tablet, intelligence, and management systems. They enhance all aspects of our work from secure video visitation systems to visitation management in controlled environments. We also work closely with innovative partners who bring new technology and solutions to correctional facilities to improve communications, safety, and education.





We recently introduced a new telehealth app to streamline and automate health requests, triage, appointment scheduling, virtual consultations, and prescription refills in correctional facilities. The app gives incarcerated patients quicker access to quality care and reduces the safety risks and costs associated with moving patients throughout secure facilities.

## Networks

Our culture of innovation allowed us to move beyond a historical reliance on Wi-Fi, to create a true mobile experience inside correctional facilities.

Today, we deploy Advanced Wireless Networking (AWN), private LTE. Together with our Inspire (r) tablets, our network allows:

- Sustained growth of our communications system
- Proprietary and third-party applications
- Increased accessibility
- Improved service quality in voice and video
- Industry-best security

These competitive advantages allow us to offer more sophisticated solutions to improve safety, communications, and education within our client facilities.

- Faster time to completion, meaning faster access to services.
- Stronger, higher capacity radios means improved performance with fewer piece of equipment.
- Increased coverage gives more access regardless of facility design.
- Safer, SIM-based authenticated, network access controls.
- Higher quality service and bandwidth.
- Lower latency for video and voice applications.
- Higher application and content scalability.

## Visitation

In addition to in-person visitations at a facility, we offer a robust virtual visitation tool.

- Video visits offer more options for contact with support networks including longer hours, more visiting opportunities, and the ability to include more visitors per visit.
- More than 5 million youth (under 17) experience parental incarceration. Video visits play a crucial role in maintaining parental connections.
- Video visits can also lessen the burden on facility staff, allowing more focus on safety.

Research shows that cost of travel for in person visits can be up to **\$200 for gas, food, and lodging** and that **76% of family members** reference financial burdens associated with in person visits. We also know that when **inmates received visits of any type, they had a 31% reduction in future reoffending.**

## Broad Support For Justice Involved Families

ViaPath has committed to specific programs that demonstrate the full spectrum of ways we are working to help transform corrections: free communications programs across all of our facilities, a foundation that supports the families of the incarcerated to break the cycle of recidivism, and a Second Chance hiring program that helps lift the barriers to employment, a major hurdle facing people during reintegration.

## Free Calling Program

ViaPath Technologies understands the impact communication service costs have on individuals and is committed to offering the lowest rates possible. Since March of 2020, we have worked diligently with our facility partners to provide free calls and other services that help justice involved individuals stay connected with their loved ones.

Our program demonstrates a deep understanding of the role communications play in the reintegration journey. We are committed to ensuring that each and every incarcerated individual has access to a baseline of free communication options, regardless of financial situation. To date, our program has provided more than 100 million free calls to incarcerated individuals.





# Accessibility

**ViaPath focuses strongly on Americans with Disabilities Act (ADA) compliance to ensure all incarcerated individuals can benefit from communication, education, and relaxation options.** ViaPath's commitment to accessibility is supported by in-house certified experts.

Our tablet operating system and communication offerings are compliant with the recent FCC Telecommunications Relay Service requirements, Federal Section 508 standards, and the international Web Content Accessibility Guidelines. We further support accessibility with features like an extended battery life and dual headset jacks.

We translate our prompts and other materials for incarcerated individuals and their families into multiple languages to help ensure clarity and comfort when using our services.

Our virtual visitation solution supports an unprecedented level of accessibility for visitors, which benefits the incarcerated and enhances connections with their families.



OUR

COMMUNITY





ViaPath Technologies believes that the reintegration process begins immediately upon entering a correctional facility—and continues during and after release.

To support that journey, we provide supportive tools and resources that address criminogenic risk factors like substance use disorder, education, and employment. From online education and reintegration services to post release training, we stand behind the justice-involved community at every step.

## Education

In correctional facilities across the United States, we deliver programming through our signature Inspire® tablets. The secure hand-held tool allows users to communicate regularly with loved ones and access a wide range of education and job training materials as well as religious materials, reading, and other programming. The knowledge, skills and certifications that incarcerated individuals gain can change the trajectory of their lives.

**“We all have the ability to change the way we make choices and every one of us—formerly incarcerated or not, deserves a second chance.”**

Education and training are key factors in successful reintegration and help boost employment prospects.

**Statistics show that 41% of incarcerated individuals lack a high school diploma—a credential required by many employers.**

Through ViaPath programming, incarcerated learners can earn a high school diploma or its equivalency at their own pace—while developing digital literacy skills. Tablet-based workforce training programs are also available to help incarcerated individuals prepare for other hands-on training and certifications that can lead to high-paying jobs.

Online education resources are seamlessly installed pre-release to allow incarcerated individuals to complete programming before exiting facilities—and post-release. We provide most course offerings free of charge to all tablet users.



ViaPath educational programming currently supports more than one million incarcerated learners across the United States who collectively completed more than 25 million hours of learning and instruction. We know it is time well spent. Those who participated had far better outcomes. Forty-three percent were less likely to recidivate. Thirteen percent had a higher chance of finding employment post release—a number that rose to 28% with vocational training.

## **2C Workforce Solutions**

Our bedrock belief in the role employment plays in successful reentry led to the launch of 2C Workforce Solutions in June of 2023.

The 2C Workforce Solutions model makes active connections between Second Chance candidates – formerly incarcerated people who are now prepared and eager to work – and a community of open-minded employers who carefully consider each candidate's circumstances.

**2C Workforce Solutions has partnered with the US Chamber of Commerce as a national resource in their Second Chance Hiring Guide and presented at the inaugural “Reimagining Futures” conference in September 2024.**

We work across stakeholders to match the right employee with the right job. Candidates are met with a process that is background-check friendly and understands individual needs and strengths. Society for Human Resource Management (SHRM) studies have found that 82% of managers think that employees with criminal records are as valuable or even more so than employees without records.

**More than 650,000 people leave prison each year. Stable employment is a leading factor for successful reintegration and fair chance hiring plays a crucial role in reducing recidivism. According to the US Sentencing Commission, recidivism rates are cut by 40% for returning citizens who can find work within one year of release.**

Candidates receive individualized placement and career development services from resume writing to interview preparation and skills assessment. We collaborate on workforce development programming that recognizes the underlying factors that prevent Second Chance candidates from succeeding, and advocacy efforts to promote fair and equal access to job opportunities.



## ViaPath Technologies Foundation

ViaPath Technologies established the ViaPath Foundation in 2022 to advance its mission of ensuring equal opportunities for the incarcerated and justice involved. Foundation grants fund new and existing programs that support and protect at-risk children and youth.

The foundation is focused on caring for the “hidden victims” of incarceration, the children caught up in a cycle of incarceration that often has generational consequences. Studies show that the children of incarcerated parents are six times more likely to be incarcerated themselves.

However, maintaining the child-parent relationship while a parent is incarcerated is proven to improve the child’s emotional response to the incarceration as well as encourage parent-child attachment.

**Despite these findings, almost half of parents in federal prisons report not having personal visits with their children. More than 60 percent of parents in state prison and more than 80 percent of parents in federal prison are incarcerated more than 100 miles from their last place of residence.**

Nearly half of incarcerated individuals are the parents of minors. The more than 5 million children they leave behind suffer trauma that stunts brain development, lowers school performance, and impacts health. Nearly half are raised in foster care and many are likely to encounter the juvenile justice system themselves by the time they turn 17.

The Foundation is committed to transforming young lives by strategically investing in organizations that create meaningful, lasting change. Our grants support a diverse array of initiatives, from foster care and mentoring programs to educational development and support for those impacted by incarceration.

In the inaugural round of grant making the Foundation awarded grants to four organizations. For the second round in 2024, we expanded our support to award grants to ten organizations across the country.

We proudly partner with organizations such as Foster Love, Comfort Cases, and the DC Family & Youth Initiative to uplift children living in foster care. Through mentoring programs such as Big Brothers Big Sisters DC, Amachi Pittsburgh, and Hope House DC, we provide guidance and positive role models for youth in need.

Our commitment to education and development is reflected in our support of programs like Reading Legacies, Wonderseed Foundation, and the US Dream Academy. Additionally, we extend our support to those directly impacted by incarceration through our partnership with the Osborne Association. By investing in these initiatives, the Foundation is dedicated to rewriting the narratives of young lives, one grant at a time.

As it continues to grow, the Foundation is an important next step in creating the kind of resilient communities that can help the young lives touched by the judicial system realize their promise.

## Juvenile Justice Programs

ViaPath supports efforts to give justice involved youth access to opportunities and services that can help them change the direction of their lives. By redirecting youth instead of incarcerating them, we can mitigate the stigma that follows them even after release and hinders efforts to find a safe place to live, obtain financial aid for college, get a job, or serve in the military. Justice-involved youth need guidance and opportunities to move forward in life – to find confidence and grow into independent, contributing citizens.

**Young adults, ages 18-24, represent 9.5% of the US population, yet account for 23% of all arrests.**

**According to the Office of Juvenile Justice and Delinquency Prevention (OJJDP), approximately 25,000 youths are held in residential placement facilities**





Through our tablets, ViaPath provides juveniles, completely free of charge, a variety of reintegration resources to help reduce recidivism and improve outcomes for these young adults (ages 18-24).

These free resources include:

- GED/HiSET preparation and High School diploma coursework
- More than 1000 resources focused on job skills, emotional intelligence, family connection, and establishing a supportive social network

- More than 2000 resources focused on 360-degree self-improvement (mental health, substance use, anger management, self-esteem building).

Juveniles have access to these resources post-release for an indefinite period of time, allowing them to continue their growth and development into productive members of society and their communities.

Youth who participate in rehabilitative services focused on peer associations, substance use/abuse, aggression, and social skills show a 17% decrease in recidivism.



## Diversionary Programs

ViaPath is proud to partner with court systems across the country on their Diversionary or “no-entry” efforts to help offenders ages 17-25 break the cycle of incarceration.

ViaPath Technologies offers content to support and equip individuals working to avoid jail time and eventually have their records expunged.

This support includes more than 500 learning hours and over 130 resources focused on job skills, life skills, and self-improvement,

all available for free through any laptop or mobile device while they are participating in the program and beyond.

Additionally, through our second-chance friendly staffing agency, 2C Workforce Solutions, we provide these individuals with resume review and preparation resources, mock interviews, and appropriate clothing. Through our partner companies, we aim to provide gainful employment, including a full benefits package, to the individuals successfully completing Diversionary Court.





# Champions of Change

The Champions of Change are a group of ViaPath employees and advisors, **driving transformative success in reintegration for returning citizens.** They embody the mission of ViaPath Technologies and its subsidiary, 2C Workforce Solutions, to break the cycle of incarceration.

Within local communities and businesses, **the Champions are educating, innovating, and creating opportunities to have a positive impact for individuals that have been formerly incarcerated.**

These initiatives support returning citizens in the local community and also have a positive impact on their families, local groups, and the community at large.



# OUR PEOPLE





ViaPath Technologies is committed to attracting, retaining, and motivating top talent to ensure that our customers receive the very best products, support, and services. By providing strong performance-based, market-competitive compensation and benefits programs, ViaPath has been successful in building and retaining a strong workforce across the United States.

The company strategically works to build and promote an inclusive and diverse team and has been recognized as a leader in delivering clear pathways to work-life balance and professional growth.

## Talent Acquisition

ViaPath sets ambitious but achievable recruitment, retention and advancement goals to help deliver on our organizational commitment to workforce diversity. Objectives specifically focus on recruiting people from ethnically diverse backgrounds, women, veterans, and second chance candidates.

Progress on each of our goals is tracked from year-to-year and reported to executive leadership and the Board of Directors.

**Since 2022, ViaPath's workforce demographics at all seniority levels showed demonstrated growth of:**

**11%** IN EMPLOYEES OF COLOR

**100%** INCREASE IN SECOND CHANCE CANDIDATES

## Diversity & Inclusion

Diversity, Equity, Inclusion and Belonging are at the core of the company's mission and values, which set the standards for involving all of our stakeholders in ensuring that ViaPath reflects the diversity of the people we serve.

ViaPath models internal equity internally by creating opportunities that provide equal access, and by celebrating the value of different perspectives and cultural competencies. Our five core values are:

- 1. Integrity:** working to meet high ethical standards
- 2. Accountability:** owning outcomes and solutions as a team, and as individuals
- 3. Teamwork:** working across difference to meet the needs of our company and customers
- 4. Innovation:** leading with creativity, and embracing change
- 5. Excellence:** continually improving performance.



Cultivating a sense of belonging helps employees feel secure, allowing them to be authentic and feel appreciated at work.

Like the industry writ large, ViaPath's workforce is generally drawn from IT, telecom and law enforcement – areas that traditionally skew white and male when compared to the general population.

Another essential part of ViaPath's DEI work is helping our talent reach their full potential. We do that by sponsoring inclusive employee networks, taking measures that promote work-life balance, and arming team members with the resources they need to learn and grow.

## Employee Resource Groups

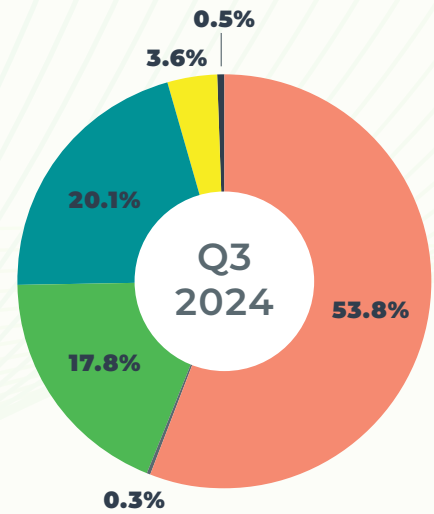
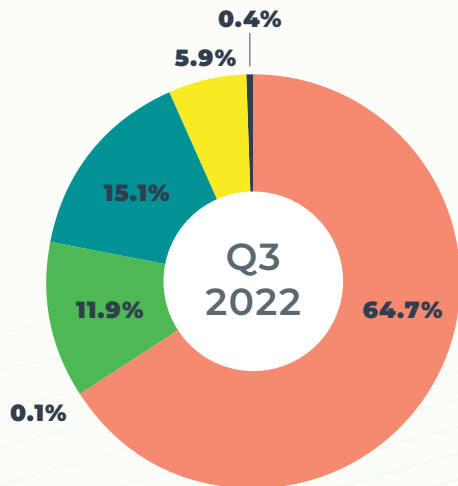
ViaPath Employee Resource Groups (ERGs) help individuals with similar backgrounds have a larger voice within the company, share the knowledge and experiences that drive organizational success, and develop individual potential.

The six groups are:

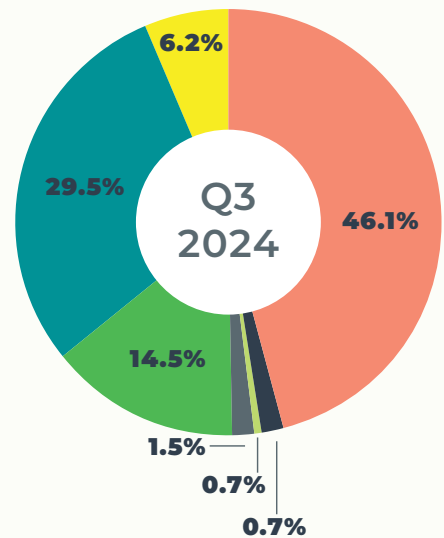
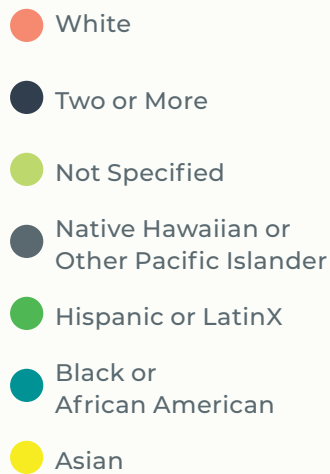
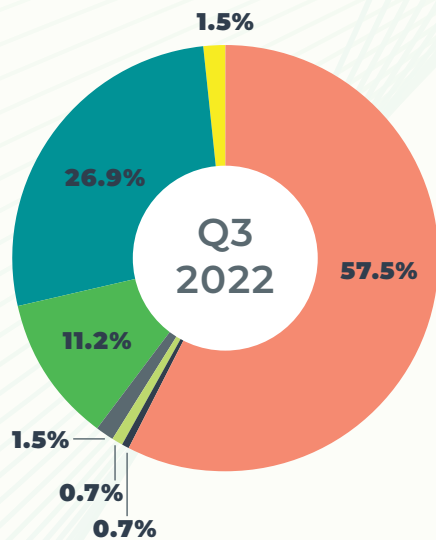
- Alliance for Women's Empowerment (AWE) AWE
- disABILITIES
- Friends and Family Voices (FNF)
- Global Diaspora Black Leadership Forum
- Vetnet
- ViaPRIDE



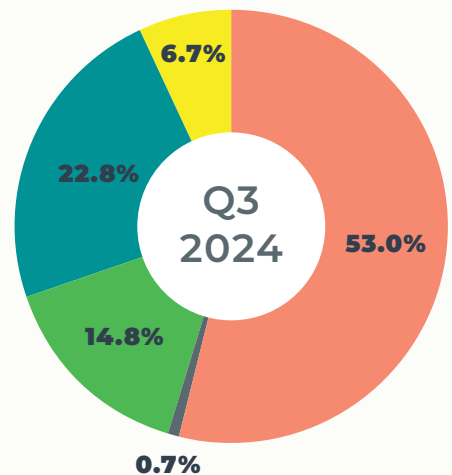
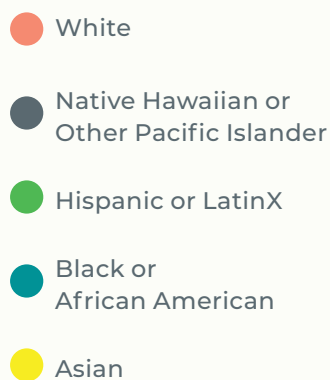
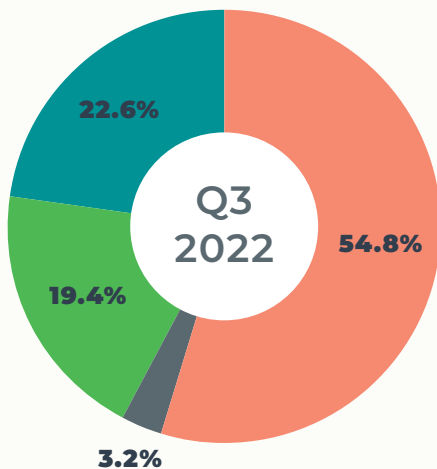
## Overall Workforce (Ethnicity)



## Operations (Ethnicity)



## New Hires (Ethnicity)





## Employee Benefits

Employees are also given a path to work-life balance. ViaPath's Flexible Time Off (FTO) program allows them to manage their own time away from work with complete privacy and flexibility. Unlike traditional programs, FTO rolls annual sick, personal, and vacation time into a single program that doesn't limit how leave is used – or count against holiday time off. Our commitment to employee well-being is highlighted by our FTO approval process that allows the direct managers closest to each employee to approve FTO time.

ViaPath Technologies offers educational opportunities that help offset tuition costs and connections to e-learning platforms. The tuition assistance program is robust. Employees can qualify for up to \$3,000 annually to pursue undergraduate degrees, and up to \$4,000 each year for graduate courses that align with our businesses.

The company also offers access to Pathways to Success, an on-demand, e-learning platform that makes more than 8,000 courses available to employees and leaders. Materials span IT practice labs for skills and certifications, engineering, compliance, and general business skills like communications, leadership, and the basics of management.

In addition to Skillsoft offerings, we've begun creating and distributing internal product and process content based on the specific needs of our businesses. During the past two years, ViaPath has created and deployed new and updated compliance courses that include employment law, DE&I, ethics, code of conduct and workplace harassment. We also created and distributed training materials focused on our phone, video, and messaging platforms to ensure that our account teams have the tools necessary to achieve a Commitment to Excellence.

## ViaPath Technologies Awards

ViaPath Technologies has been recognized as a top workplace in the USA for its leadership in employment hiring practices, culture, diversity, and work-life balance.

For the past three years, ViaPath has received Top Workplaces USA from Energage for leadership in creating a culture that supports employees at work and at home. In 2021, the company also received a Cultural Excellence badge for Woman-Led Top Workplace, and an Industry Badge for Technology Industry Top Workplace. ViaPath was recognized with the Cultural Excellence Badge of Work-Life Flexibility for the second time in 2023, based on employee feedback during our annual engagement survey.

Our work with Veterans has also earned accolades. For the past four years, the company has received the Department of Labor HIREVets Platinum Medallion, which recognizes employers' efforts to recruit, employ, and retain veterans. The award is based on the corporate commitment to hiring and retaining veterans, as well as compensation and veteran-focused programming. ViaPath was also named a certified Virginia Values Veterans (V3) employer in 2022.

Health and well-being programming has also earned praise. ViaPath's commitment to the health of our employees was recognized with the Aetna Workplace Wellbeing Gold Award in 2022. The year before, the company received the Aetna Inspiring Change Bronze Award for our efforts to ensure a healthy work life balance – a recognition received by only 81 companies across the nation.





# GOVERNANCE & INTEGRITY





## Data Privacy and Security

At ViaPath Technologies, we understand that our correctional facility partners and service users demand the highest levels of data security for both user access and data storage.

The ViaPath Technologies Security Architecture is designed to ensure the security of data at rest and in transit in ViaPath Technologies data centers and cloud services. This architecture uses a layered approach coupled with network segmentation, from the partner level all the way to the data center and cloud.

This architecture and our corresponding information security policies and procedures were developed using the NIST Cybersecurity Framework and industry best practices as the foundation.

The ViaPath Technologies network(s) ensure that data transmission takes place over encrypted VPNs running on our secure infrastructure and that critical data at rest is encrypted. We employ robust vulnerability assessment practices, multi-tiered penetration testing, as well as a bug bounty program to identify potential system and application vulnerabilities. Further we employ an independent third-party vendor to enhance our Security Information and Event Management (SIEM) program by monitoring our security infrastructure 24x7.

ViaPath Technologies' network architecture maintains controls through edge routers, firewalls (to limit connections to a strict whitelist of allowed devices and allowed destination URLs) and through onsite proxy servers (to ensure no direct connection to the Internet) as well as multi-layered web filtering. We have taken great care to ensure that all hardware provided to facilities is fortified to ensure it is compliant with today's security best practices.

### We currently maintain certifications for:



**2 Type II compliance certifications**



**800-53 Security and Privacy Controls assessment International**



**National Institute of Standards and Procedures (NIST)**



**Merchant Level 1 Systems and Organization Controls (SOC)**



**Organization for Standardization (ISO) 27001 certification.**



**Payment Card Industry (PCI)**

Finally, we maintain an aggressive vulnerability assessment and remediation program for the applications deployed on our tablet technology to ensure that the user experience is the best possible without compromising institution security or regulatory guidance.

**Our company is dedicated to the protection and reliability of our partners' data, using the latest technology and industry best practices.**

We understand we have an obligation to handle data appropriately, in accordance with applicable law and regulation. We require all employees to complete mandatory cybersecurity awareness, information handling and privacy training at the time of onboarding and on an annual basis. We conduct privacy reviews when we develop and modify products, systems or other initiatives. Our privacy policies promote transparency by disclosing how we collect data and use such information. We monitor and update our policy to conform with changes to applicable law and regulation.

## **Supplier and Partner Governance**

ViaPath's supplier governance process is a critical aspect to ensuring our suppliers meet necessary standards and regulations. This process begins at the identification of potential sources. We search broadly and completely for suppliers and conduct a competitive process when possible.

Once selected, our supplier vetting process includes several key components such as Secretary of State verification checks, visual compliance, and a vendor questionnaire. Secretary of State verification checks ensure the supplier is legally registered and in good standing to conduct business. Visual compliance involves screening suppliers against various watchlists to ensure they are not involved in any illegal activities. The dynamic party screening component of visual compliance automatically re-screens our vendors as denied and restricted party screening lists change. The vendor questionnaire gathers detailed supplier information. Any adverse information identified is examined further. If all screenings are clean, we initiate an agreement.

Our Supplier Master Services Agreement (MSA) incorporates Environmental, Social, and

Governance (ESG) standards, requiring sustainable and ethical business practices and compliance with ViaPath's Ethics and Business Conduct policy. Through execution of the MSA, the supplier agrees to act in an ethical manner at all times. These terms ensure our suppliers are committed to reducing their environmental impact, promoting social responsibility, and maintaining strong governance practices.

## Business Ethics

We consider good governance essential to driving success and building long-term and sustainable value for our stakeholders. We are committed to operating with ethics, integrity, and respect.

We rely on the good judgment of our employees to act with integrity, and to comply with laws, regulations, our Code of Conduct, and our Ethics and Business Conduct policy. We also work to provide clear disclosures to consumers and customers.

Our Ethics and Business Conduct policy serves as an umbrella that encompasses our commitments over and above simply complying with laws and regulations. We strive to conduct business in a way that reflects our Code of Conduct and fully complies with all laws and regulations –

as a company and as individual employees. Violations are treated seriously, and generally result in termination of employment.

- Conduct our business with honesty and integrity, complying with the laws and regulations of the United States and each foreign country of operations, except to the extent inconsistent with U.S. law.
- Commit to and rigorously enforce the highest standards of ethical conduct in dealings with all constituencies: employees, customers, partners, communities, and suppliers.
- Communicate our standards of ethical conduct to employees and authorized representatives of the Company and hold them accountable for their conduct.



- Promote a work environment that is positive, diverse, open, and inclusive, in which employees and others can ask questions about ethics issues, express work-related personal concerns about ethics issues, make inquiries about ethics issues, or report violations of the Policy or applicable law without fear of retaliation

Our company enforces a zero-tolerance policy for bribery or corruption of any kind. All employees receive general anti-corruption training as part of their annual training. In addition, employees in relevant operational roles receive targeted anti-corruption training and communications that clearly articulate our expectations, core principles, and zero tolerance practices.

Employees are required to obtain legal approval before giving anything of value to a public official. There are internal controls in place, such as monitoring travel, gifts, and expenses, to guide and minimize high-risk transactions.

Our general compliance training is supplemented with targeted communications and in-person instruction on an as-needed basis.

## Political Engagement

In line with our emphasis on ethics and integrity, company policies and procedures ensure that employees act in compliance with applicable laws and regulations. Our political activities are subject to robust internal controls and approvals.

As a government contractor, ViaPath must abide by stringent rules and regulations related to bribery, gifting, billing, and representation, as outlined in our Code of Conduct.

In addition, consultants to the company are required to go through a background check, participate in compliance training, and sign our Code of Conduct.

Political contributions from company funds, including in-kind donations, are subject to stringent approval and oversight.



To ensure employees understand and act in accordance with our Code of Conduct, each is provided with:

- **A copy of the Code of Conduct**
- **Annual training:** on relevant compliance topics such as ethics, avoiding conflicts of interest, upholding fair competition and anti-trust, anti-corruption and anti-bribery, confidentiality, Bank Secrecy Act and Anti-Money Laundering and Counter-Terrorist Financing, data privacy and protection, consumer protection, and respecting applicable laws.
- **Additional training:** in areas that are relevant to employees' specific duties and responsibilities.
- **Access to multiple avenues:** to report concerns, including a toll-free Integrity Hotline that allows employees to reach out anonymously for guidance.

**When notified of a concern, the company follows protocols that investigate and assess the alleged wrongful act, and impose discipline where misconduct is found.** As appropriate, issues are escalated and/or disclosed to the appropriate authorities.

# LOOKING AHEAD





As we move forward, ViaPath Technologies remains committed to delivering solutions that set new industry standards. As the leading global technology company within corrections, **we will continue to provide advanced communications, technology, financial, and management solutions that facilitate meaningful connections, provide educational opportunities, and enable successful reentry for both current and formerly incarcerated individuals.**

We will also continue to provide a best-in-class employee experience to ensure we attract and retain highly-skilled talent who are fully focused on our mission.

Finally, **ViaPath Technologies is committed to making a difference by ensuring individuals everywhere have the same opportunities—criminal records or not— while helping transform facilities into safer environments for staff and incarcerated alike.**

