

Environmental, Health, Safety (EHS), and Security Handbook

for Service Providers to Infinera Corporation

Legal Disclaimers

Infinera is a Smoke and Tobacco Free Company

The information contained herein should not be relied upon as a substitute for legal or regulatory requirements or the requirements of the contracting company. Infinera shall not be held liable for any improper or incorrect use of the materials or information contained herein and assumes no responsibility for any use of this information.

Failure to observe the policies and procedures in this handbook can result in the loss of the contracted work and/or removal of the contracted employee from Infinera property.

1 Introduction

The purpose of this Handbook is to introduce you and your personnel to Infinera's environmental, health, safety, and security policies and rules. It is Infinera's expectation that all its contractors and service providers meet or exceed all applicable local city, county, State and Federal rules and regulations while doing business with Infinera. This Handbook does NOT take the place of safety training nor is the information contained herein all inclusive.

You and your personnel are required to comply with all applicable Occupational Safety and Health Administration (OSHA) or Cal/OSHA, Environmental Protection Agency (EPA) or Cal/EPA, Department of Toxic Substance Control (DTSC), State and Local regulations, your company's own health and safety program, as well as Infinera specific requirements applicable to the work being conducted by you at Infinera site(s). Each service provider is responsible for informing their personnel of these policies and rules and ensuring that they abide by them.

2 Performing Work at Infinera

Prior to performing any work at Infinera, the contractor must have an assigned point of contact (POC), hold an approved scope of work, a work plan, and a schedule. The work plan may require details to confirm compliance with Infinera EHS and Security policies:

- Injury and Illness Prevention Plan (IIPP) IDOCS 744759774-1978
- Site Incident Prevention Plan (SIPP) IDOCS 41-48 or equivalent
- Infinera IT Security Policy IDOCS-545852907-98
- Infinera Acceptable Use Policy IDOCS-545852907-101
- ETQ H&S Workflow IDOCS 744759774-1995

It is the responsibility of the service provider to understand and follow these policies.

2.1 Infinera Contact/Infinera Project Manager

Service providers are required to know their Infinera contact and communicate their work plan to conduct the work and plan for any potential impact to Infinera.

2.2 Contractor Scope of Work

All onsite service provider personnel shall understand their scope of work, where it will be performed, the methods that will be used to follow the IIPP and SIPP, and whether their activity will impact Infinera Corporation's processes, products, or employees.

The Infinera Project Manager is responsible to send the scope of work and action plan (once established and communicated between affected stakeholders) to Infinera EHS department for risk assessment and approve the proposed work PRIOR to coming onsite or implementing work on site.

The service provider will be informed of any other applicable EHS policies by the Infinera Project Manager.

2.3 Scheduling

All work proposals must include a schedule. These proposed schedules shall be submitted to all affected department management with sufficient time (at least 48 hours or two business days, preferred 5 business days) for review, coordination if required, and approval.

2.4 Equipment, Tools, and Materials

The service provider must provide their employees with functional safety equipment, tools, and personal protective equipment (PPE) that is task-appropriate and in good condition. The service provider must provide all necessary training to enable their employees to perform the contracted tasks properly and safely, prior to working on Infinera projects.

The service provider must maintain records of this training and provide them upon request.

3 Identification and Access

- Complete required actions as required by the local site's department of public health requirements as it relates to community health, community risks, and public health.
- Coordinate with an Infinera POC for appropriate tests prior to entering Infinera site.
- All unescorted service providers are required to register with our Security office, show proper identification, and obtain a contractor badge.
- Once a badge or ID is issued, it is your responsibility to use it properly.
- Piggybacking, or tailgating is never allowed. If you use your badge for entry, you are responsible until the door is secured behind you. Workers who are entering behind you must swipe the card reader with their badge before you allow them entry.

All service providers entering restricted access areas may be required to have their vehicles, equipment, and person searched before entry to or exit from a restricted area.

All on-site service provider personnel requiring access to restricted areas shall be subject to criminal background checks. These background checks will be audited annually. Background checks on service provider personnel must be conducted at least every three years.

Badges must always be clearly visible and worn at or above the waist while on Infinera premises. Assigned badges must never be loaned to others. If you lose a badge, please report it immediately to Security.

Reporting Emergencies

If a service provider is injured on the job at an Infinera site, the injury must be reported through the emergency line if medical assistance is required.

Any injuries must be reported to their Supervisor and Infinera as soon as possible or before the end of the shift. Details for reporting appear on the back of this Handbook.

For any injuries, near misses in environmental or safety, incidents, or suspected or confirmed exposure to infectious disease(s), the service provider must notify their Infinera POC immediately upon discovery, end of business day, or before his/her shift is completed.

The Contingent Worker must follow his/her Employer's procedures and policies. He/she must also report to his/her direct Employer's Supervisor and Infinera POC.

4 Building Evacuation

The service provider's employer must ensure that their employees working at an Infinera site are familiar with the work location's evacuation procedures and nearest exit (primary and secondary) routes. The Contingent Worker can coordinate with their local Infinera POC and review the site's posted evacuation map and procedures.

- In the event of a building evacuation, please evacuate the affected area immediately, proceed to the Evacuation Assembly Area (EA), and find your Infinera contact and make your presence known to the Emergency Response Team (ERT) member.
- Do not leave the AA unless instructed otherwise by the ERT or authorized emergency personnel.
- Return to the building after ERT issues an "ALL CLEAR" message to occupants.

5 Accidents, Near Miss, and Incident Reporting

All incidents and any near miss¹ must be reported immediately to your Infinera contact as soon as possible.

- Report the incident via **EtQ Reliance H&S Module** as soon as possible and provide **preliminary notification** to Infinera within 24 hours of the accident or incident via cell phone or email.
- An accident investigation must be conducted and documented by the service provider as soon as practicable, describing the incident and identifying the cause(s) and the corrective action(s) for preventing future incidents.
- REPORT ALL ACCIDENTS OR NEAR MISSES TO INFINERA SITE CONTACT REGARDLESS OF THE INCIDENT CLASSIFIED AS AN INJURY OR NOT.
 - Infinera Contact/ Project Manager reports all incidents, near misses, first aid or injuries on **EtQ Reliance**.
 - Report all incidents when they occur within the shift or within 24 hours.
 - Report all incidents related to any EMT or hospitalization within 8 hours to EHS.
 - Report any fatality as soon as possible or within 8 hours to EHS.

6 Stop Work Authorization

Anyone can issue a Stop Work Order (SWO) for imminent danger or serious hazard. To impose a SWO:

- Alert the affected employee(s) or contractor(s) engaged in the unsafe work.

¹ A near miss is any an unplanned event that did not result in an injury or property damage, but had the potential to do so.

- Request that the work be stopped.
- Notify your immediate supervisor and your Infinera POC.
- Upon notification, a qualified Infinera representative(s) will investigate and make sure corrective measures are developed and implemented as needed. A SWO can only be lifted after imminent hazards are eliminated.
- If the SWO was issued by a Safety Representative, it can only be lifted by the same Safety Representative or Delegated Site Leader.

7 Personal Protective Equipment

Individuals working in areas where Personal Protective Equipment (PPE) is required, must have appropriate Infinera required PPE to work in that area.

Clean room PPE is provided by Infinera; however, task specific PPE must be provided by the contractor's employer.

All PPE shall:

- fit properly as per standards or local ordinances and mandates, as appropriate.
- be identified, properly stored, be in good working condition, and accessible for use as per job hazard assessments.

8 Ladder Safety

Contract service providers must provide their own ladders and must use them in accordance with regulatory requirements and per manufacturer's instructions.

- Fiberglass type only – No metal or wooden ladders allowed.
- Select the appropriate size of the ladder to reach the height needed (**never stand on the top two rungs**).
- Use barricades and/or post warning signs or safety cones for doorways and walkways.
- Ladder must be on a stable, level surface
- Engage ladder locks, chains, or properly store.
- Check the condition of the legs, rungs, and cross-supports before each use as per OSHA 1910.23(b)(9) requirements.
- Keep hands free of objects while ascending and descending the ladder.
- Remove ladder off-site at the end of the shift or store ladder properly (horizontally or with means to secure with chains or hooks to hang) to meet local seismic or fire life safety requirements when ladder is not in use or at the end of the shift.

9 Electrical Safety

The primary safety procedure to minimize the risk of injury due to exposure to electrical shock is to perform lockout/tag out. All work shall be considered energized until isolated, tested, and locked out and/or tagged out.

- All electrical work must be in accordance with the National Electrical Code.
- Use of the contractor's LOTO checklist to turn on or off energized power requires the approval of Facilities and affected area and or department management.
- Electrical panels shall remain closed except while being serviced.
- Temporary wiring must comply with the National Electrical Code & NFPA guidance.
- Ground fault interrupters are required on all portable electrical tools being used.
- All modifications shall be documented, labeled, submitted to, and reviewed with facilities.
- Do not operate equipment LIVE without a written risk assessment and counterplans.

10 Electrical Work, Live

No service provider shall perform live electrical work unless authorized by Infinera EHS and Facilities.

The detailed plan of action must be provided at least two business days prior to the planned work and approved by Infinera EHS and Facilities.

Any high voltage live electrical shall have a prior risk assessment and approved SIPP of the plan and area of isolation to be established during the work. All service providers performing live electrical work shall have the proper arc flash personal protective equipment and training.

11 Hot Work

Hot work permits are required for all open flames, cutting, grinding, soldering, or welding operations inside, outside, or on the roof of any building.

Service providers must obtain a permit from their Infinera contact **before** the work may begin.

All combustible material must be removed from the area or kept at least 25 feet away.

Please refer to the hot work policy for more detailed information on **fire watch 30 minutes duration before and after the work has been performed.**

12 Overhead Work

Overhead work is work that is performed from an elevated location which is adjacent to or directly above normally occupied areas. This is to include hallways, walkways, alleys, employee parking lots, driveways, and shipping and receiving areas.

Overhead work shall not be conducted in such a manner that it creates a possibility of a falling object striking an employee below.

Review applicability to complete the Site Incident Prevention Program (SIPP) form and follow required actions as per IDOCS 41-48 Site Incident Prevention Plan (SIPP).

13 Boom, Crane, and Helicopter Lifts

Any work requiring the use of a boom lift, crane, or helicopter to lift or move any equipment must have a lift plan completed and submitted to Infinera EHS for approval at least five business days prior to conducting any lifts.

The area under the lift must be evacuated of all employees and isolated (roped, barricaded, isolated, danger tape, and/or cones) to ensure no access to the identified area during the lift.

The specific time/date/area(s) impacted must be communicated site wide for proper logistics planning and awareness with emails and signs at doors.

Project Managers must complete Infinera's SIPP with a crane lift plan and submit it to EHS for risk assessment and mitigations, as appropriate, at least two weeks in advance. For emergency SIPPs, contact your site EHS professional for urgent assistance.

14 Scaffolds, Platforms, and Lifts

Service providers performing overhead repairs or minor construction activity must have a written action plan communicating the work to be performed to Infinera EHS and Facilities departments.

If the work requires the use of ladders or other lifting aids located at floor level, generally an evacuation plan is not required; however, barricades, cones, danger tape, and/or other alerting techniques must be used in the area to warn employees of the potential hazard.

If the overhead work cannot be safely performed by establishing a hazard zone and restricting access to authorized personnel, then it must be scheduled for off hours when the area is not occupied.

Any overhead work being performed in labs, clean rooms, or manufacturing areas needs to be reviewed, approved, and communicated with EHS, facilities and area/department management prior to work done for that day.

If the work cannot be completed during off hours and either carries over to or must be entirely done during normal business hours, the following are additional items to be addressed in addition to barricades, cones, and/or danger tape.

- If main egress routes are to be blocked, alternative evacuation plans need to be established and communicated prior to the start of the project.
- When using platforms, lifts, scaffolding, or ladders be aware of overhead hazards, such as electrical, plumbing, and mechanical hazards.
- The area where a lift or platform is being used will become a hard hat area.
- Signs must be used, and the area must be isolated to prevent personnel from walking through the area. Hard hats must be worn.
- Signs must read "DANGER – WORKING OVERHEAD" or similar.
- Ceiling tiles must be replaced and set in place appropriately at the end of the business day.

14.1 Scaffolding

All scaffold erecting shall be completed under the direction of a competent person and constructed in accordance with all local, State, and Federal regulations.

14.2 Lifts

All operation of lifts shall be completed by a competent person who is familiar with the device currently in use.

15 Roof and Elevated Work Areas

- Working alone when using fall protection equipment is not allowed.
- Fall protection equipment may be required when climbing trees, poles, or whenever a fall from of height 48 inches or greater is possible.
- Fall protection is required when work is conducted on a roof within six (6) feet from the edge.
- Access to the roof is not allowed without permission from the Infinera Facility Manager.

16 Rooftop, Chemical Bunker, and Other High Hazard Areas

No work is to be conducted on rooftops, in the chemical storage areas, or other high hazard areas without prior written notification to Infinera.

Notify your Infinera Contact at least one day ahead of time of your scheduled work in these areas.

All work must be approved prior to coming on site.

Notify the Infinera Contact and/or Global Security Operation Center (GSOC) upon arrival at the building to ensure awareness of your work in these areas.

Refer to the SIPP form for details on the Lone Worker prohibitions.

17 Hazardous Materials and Waste

Prior to bringing a hazardous material to an Infinera site, the service provider must submit a Safety Data Sheet (SDS) to their Infinera contact and complete a Chemical Approval Form or equivalent, following the Infinera Chemical Approval process or equivalent.

Infinera EHS will review the SDS and evaluate EHS aspects, impacts, and mitigations, as required. Infinera reserves the right to reject the use of any hazardous material deemed unsuitable to the site.

- All hazardous material must be in properly labeled containers according to the Globally Harmonized System (GHS) format
- Provide secondary containment (150% of the volume of the primary container) as required.
- All containers holding liquid or materials must be legibly labeled (i.e., deionized water 100%).
- All containers must have a label identifying its content.

- The service provider and their personnel must use all hazardous or toxic materials in accordance with the SDS recommendations or chemical approval form at all times.
- It is the responsibility of the service provider and their personnel to know how to effectively use any hazardous and toxic materials.
- Propane tanks for trucks and lifts will be stored outside of the facility and clearly marked with the name of the service provider and contact information.
- The service provider must identify any waste (hazardous and non-hazardous) that will or has been generated in the course of their activity at Infinera, and work with the Project Manager, EHS, and Facilities to ensure the proper off-site disposal.
- All hazardous waste streams generated by the service provider(s) must be identified and addressed on a case-by-case basis by EHS and Facilities and managed to meet all applicable local regulatory requirements.

18 Compressed Gas Cylinders

- All cylinders must be in good condition and properly secured while onsite per local requirements e.g., chained at 1/3 and 2/3 or in secured containment in California.
- All cylinders must be transported only on approved carriers and stored upright with chains.
- Equipment that uses flammable gases with oxygen or other oxidizing gas is to be protected with a check valve or flashback arrestor.
- All cylinders when not in use must have the regulator removed and the valve cap in place.
- Cylinders shall not be stored in direct sunlight.

19 Non-Ionizing/Ionizing Radiation

While servicing/maintaining equipment, service providers are required to use appropriate isolation method to create (i.e., caution or danger tape to create temporary boundary off the area or provide shielding to restrict access to authorized personnel only.)

Warning signs shall be posted to warn employees of the maintenance work being performed.

20 Housekeeping

The service provider's work area must be cleaned up at the end of every workday or job shift. Service provider must maintain an orderly and safe, proper housekeeping and clean work area while on site.

Material must be maintained in an orderly fashion, stacked, or piled no higher than four (4) feet in height.

Do not block the fire lanes, aisles, exits, fire extinguishers, emergency exits, alarm boxes, electrical panels, switches, valves, etc. with the piled or stacked material at any time.

The main egress and evacuation pathway to exits and entrances must always be clear and not blocked at any time.

For services or projects which require longer than one shift or day, remove all excess materials and store in the pre-approved storage area or remove off-site at the end of the shift.

21 Storage

Work with your Infinera contact to identify a space for storage for large projects on site prior to bringing tools and equipment on site. The proposed temporary storage must be marked, approved, and communicated between Infinera Facilities, lab management, and/or EHS prior to storing on site.

Propane tanks for trucks and lifts will be stored outside of the facility and clearly marked with the name of the service provider and contact information.

Contractor-owned equipment shall be marked with the contractor's name and secured to a wall or a shelf to not create a fall hazard or egress blockage.

22 Infinera is a Smoke and Tobacco Free Company

To protect and enhance our indoor air quality and contribute towards the health and wellness of all employees, Infinera is entirely smoke and tobacco free.

Smoking (including e-cigarettes) and chewing tobacco is prohibited in all the enclosed and open worksites at ALL Infinera sites without exception. This includes all building interiors and exteriors, roofs, and parking lots, and extends to vehicles on Infinera properties.

Failure to comply with the smoke-free workplace policy may result in disciplinary action which can include the removal of the contractor from the premises and the loss of contracted work.

Secure High Value Parts (HVPs)

HVPs must never be stored in open areas or accessible when you are not physically present. HVPs must be secured in locked storage areas, including cabinets, cages, and card key controlled lab space. HVPs can include prototypes and other proprietary material, including intellectual property stored on laptops.

22.1 Secure Your Laptop

All company-owned assigned laptops must be secured when you are not in physical possession of the unit.

You have several options to consider, including the use of laptop lockdown devices, docking stations that are secured to a desk or other furniture, the use of lockable desk drawers, credenzas and filing cabinets.

IT is responsible for issuing lockdown cables and they can be ordered through Infinera's help desk system.

Follow Infinera IT Security Policy IDOCS-545852907-98 and Infinera Acceptable Use Policy IDOCS-545852907-101

22.2 Travelling with Laptops and Cell Phones

Never leave your laptop computer or company-issued cellphone unattended.

Cable locking devices or room safes must be used when laptops are left unattended in hotel rooms.

If you leave your laptop unattended in your car, lock it in the trunk or other areas that are not visible from the exterior portion of the car.

Use discretion when using your laptop computer while seated on airplanes or in other public places when you are viewing Infinera's company information.

Laptop locking devices can be ordered via the Infinera Site Services help desk system.

Service providers must follow Infinera IT Security Policy IDOCS-545852907-98 and Infinera Acceptable Use Policy IDOCS-545852907-101.

23 Contractor's Checklist for working at Infinera:

- ✓ Read Infinera's policies and adhere to them.
- ✓ Be aware of local site's COVID infectious disease control and notifications, emergency evacuation routes, and evacuation assembly area (EA) while onsite.
- ✓ Educate onsite personnel and subcontractors regarding Infinera's policies and comply with all employee training as required by law.
- ✓ Work plans must be submitted for approval by Infinera before the work is conducted.
- ✓ There are specific requirements for infectious disease exposure controls, electrical, plumbing, overhead work, hot work, and use of ladders, scaffolds, lifts, and platforms. Please follow local Infinera's policies.
- ✓ Any chemical brought on site must have prior written approval or identified on the SIPP or work plan. A Safety Data Sheet must accompany all materials that have hazardous ingredients.
- ✓ Identify the waste (hazardous and non-hazardous) that has been generated while doing the job at Infinera.
- ✓ Work with your Infinera contact and EHS to ensure proper waste disposal in accordance with local laws, regulations, and ordinances.
- ✓ Arrange for storage of your materials on-site ahead of time. There is no outdoor storage of chemicals.
- ✓ Bring your own tools, PPE, masks, etc.
- ✓ Follow good housekeeping practices along with disinfecting working surfaces after use.
- ✓ Infinera is a Tobacco/smoke free company. No smoking is allowed anywhere on Infinera's campuses. This includes e-cigarettes and chewing tobacco.
- ✓ Call Office Closures/Notifications Hotline **(408) 716-4800** which will have global updates in the event of an emergency or safety threat to notify employees and contractors if the buildings are closed.

24 Revision History

Revision history is maintained internally.

Emergency Preparedness and Response

Reporting

- Report all incidents to your Supervisor & Infinera Sponsor so the incident can be reported via EtQ
- <https://infinera.etq.com/prod/rel/#/app/auth/login>

For all non-life threatening incidents & near misses

Contact 911 for all life and safety emergency

1. Refer to your **Site Emergency Preparation Evacuation Plan** and review your Infinera contacts' names and phone number.
2. Contact 408-213-7185 for Global Security Operation Center or **Security Back-Up Mobile Contact # 408-421-4260**
3. **Report all incidents to your Supervisor & Infinera Sponsor**

Environmental Policy



Infinera conducts business in an environmentally responsible manner and is committed to protecting the environment, preventing pollution, and reducing the environmental impact of our operations by:

- Developing and producing products that meet or exceed customer requirements, while incorporating eco-design features, to minimize environmental impacts throughout their lifecycle, including end of life
- Developing products that are safe for our customers to use and conform with all relevant safety standards
- Designing packaging to reduce waste and incorporate more recyclable materials while still sufficiently protecting our products
- Measuring Infinera's environmental impact, setting improvement goals, and taking appropriate corrective actions
- Employing hazardous and non-hazardous waste management and neutralization practices
- Promoting reuse and recycling
- Reducing greenhouse gas emissions by identifying and implementing mitigation strategies to minimize Infinera's carbon footprint and impact on climate change
- Protecting biodiversity by avoiding actions that could harm or destroy natural habitats
- Communicating to our employees the importance of conformance with Infinera's Environmental and Health and Safety Policies through awareness activities and training
- Promoting sustainable transportation by encouraging the use of public transportation, carpooling, and cycling by our employees
- Encouraging the use of virtual meetings to reduce business travel and supporting a flexible work schedule to reduce emissions
- Incorporating energy efficiency equipment and energy-saving measures in Infinera's buildings, where feasible
- Complying with all applicable environmental legislation and sustainability commitments
- Providing products that conform to environmental directives around the world, such as RoHS, WEEE, REACH, and Conflict Minerals
- Providing contractors or others working on our behalf with the Contractor EHS Manual to ensure conformance with Infinera's procedures and environmental policies

Controlled in IDOCS-414740399-146

Health and Safety Policy



Infinera is committed to ensuring the health and safety of staff and anyone affected by our business activities, and to providing a safe and suitable environment for all those present in our premises by:

- Promoting leadership commitment and fostering a health and safety culture where all workers look out for and take care of themselves and others
- Ensuring that health and safety is integrated into tasks every day, without compromise, in order to prevent work-related injuries and ill health
- Establishing measurable health and safety objectives and targets to drive continual improvement
- Emphasizing personal accountability, professional conduct, and compliance with all applicable health and safety regulations and other related requirements and commitments
- Identifying safety hazards and assessing Infinera's occupational health and safety risks, setting improvement goals, and taking appropriate preventive and corrective actions
- Consulting employees and encouraging their participation in health and safety matters
- Communicating to our employees the importance of conformance with Infinera's health and safety policies through awareness activities and training

Controlled in IDOCS-414740399-146