



Supplier Code of Conduct



SUPPLIER CODE OF CONDUCT

As a global company, Infinera seeks to be a good corporate citizen in its dealings with customers, suppliers, employees, and the communities where we operate throughout the world. To ensure alignment across the supply chain, the Infinera Supplier Code of Conduct sets out the minimum standards expected of Infinera's suppliers, so they act ethically, responsibly, and in compliance with applicable laws and regulations. This Code is required to be applied by Infinera's suppliers to their first tier (or direct) suppliers and subcontractors, including providers of contract labor, at a minimum.



Here at Infinera, we are committed to the highest standards of social and environmental responsibility and we aim to operate with high ethical business standards and integrity. We expect our suppliers and business partners across the globe to share our beliefs and uphold our social, environmental, and ethical standards.

Craig Cocchi

Senior Vice President

Global Operations

LABOR

Infinera is committed to respecting the personal dignity, privacy, and rights of each individual and expects Suppliers to do the same. Suppliers shall respect internationally proclaimed human rights by not tolerating human rights abuses of any kind.

Wages, Benefits, and Working Hours

Suppliers must comply with all applicable wage and hour laws and regulations, including those relating to working hours, minimum wages, overtime, and other elements of compensation, and will provide all legally mandated benefits.

Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons shall not be used.

Young Workers

Suppliers shall comply with all local and national minimum working age laws or regulations and not use child labor. Suppliers cannot employ anyone under the age of 15, under the age for completing compulsory education, or under the legal minimum working age for employment—whichever is higher.

Harassment, Human Treatment, and Non-discrimination

Suppliers will treat each employee with dignity and respect, and will not engage in or permit corporal punishment, threats of violence, or other forms of harassment. Additionally, Suppliers will maintain workplaces that are free from discrimination and shall promote equality of opportunity or treatment in employment and occupation.

Freedom of Association

Suppliers shall respect the rights of workers to associate freely, bargain collectively, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws.





HEALTH AND SAFETY

Suppliers will provide a safe and healthy work environment and fully comply with all safety and health laws, regulations, and practices. Suppliers shall use recognized management systems such as OHSAS 18001, ILO Guidelines on Occupational Safety, or equivalent.

Occupational Safety

Adequate precautionary steps must be taken to eliminate hazards inherent in the working environment using engineering controls where practical. Whenever necessary, workers are to be provided with, and instructed to use, appropriate personal protective equipment.

Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures.

Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness.

Industrial Hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls.

Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks is to be identified, evaluated, and controlled.

Machine Safeguarding

Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories are to be clean and safe, and provided with appropriate emergency egress; hot water for bathing; adequate lighting, heat, and ventilation; and reasonable personal space along with reasonable entry and exit privileges.

Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training for all identified workplace hazards that workers are exposed to.

ENVIRONMENT

Infinera recognizes its social responsibility to protect the environment and expects its suppliers to share its commitment by working toward protecting the environment, conserving resources, and continuously improving environmental performance. Suppliers are encouraged to establish an environmental management system (such as ISO 14001). All Infinera suppliers must:

- Comply with all applicable environmental laws and regulations, maintain and keep current all required environmental permits and registrations, and follow the operational and reporting requirements of such permits.
- Endeavor to minimize environmental impact such as waste of all types, water, and energy by implementing appropriate conservation measures in their facilities, through their maintenance and production processes, and by recycling, reusing, or substituting materials. If applicable, identify the chemicals or other materials being released that pose a threat to the environment and manage them appropriately to ensure their safe handling, movement, storage, use, recycling, or reuse and disposal.

Energy Consumption and Greenhouse Gas Emissions

Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Suppliers are to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.



ETHICS

Suppliers must not offer gifts or favors to Infinera employees in an attempt to inappropriately influence business decisions and must conduct their business interactions and activities with high ethical standards and integrity, while complying with applicable laws and regulations on bribery, fraud, corruption and prohibited business practices. Suppliers shall not offer, promise, or give any undue advantage, favor, or incentive to any public official, international organization, or any other third party.

Infinera's Purchasing Ethics Policy

Suppliers must comply with Infinera's Purchasing Ethics Policy (available at Infinera's website).

Disclosure of Information

All business dealings should be transparently performed and accurately reflected on supplier's business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements. Be honest, direct, and truthful in discussions with regulatory agency representatives and government officials.

Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights and customer and supplier information is to be safeguarded.

Fair Business

Standards of fair business, advertising, and competition are to be upheld.

Protection of Identity and Non-retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

Conflicts of Interest

Avoid the appearance of or actual improprieties or conflicts of interests. Suppliers must not deal directly with any Infinera employee whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the supplier. In the course of negotiating the supplier's agreement or performing the supplier's obligations, dealing directly with a supplier's personnel's spouse, domestic partner, or other family member or relative employed by Infinera is also prohibited.

Competition

Suppliers shall under no circumstances cause or be part of any breach of general or special competition regulations.

Money Laundering

Suppliers shall be firmly opposed to all forms of money laundering and shall take steps to prevent their financial transactions from being used by others to launder money.

Privacy

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Responsible Sourcing of Minerals

Suppliers shall have a policy in place to reasonably ensure that the tantalum, tin, tungsten, and gold in the products they supply or manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Suppliers shall conduct a reasonable country of origin inquiry and exercise due diligence on the source and chain of custody of these minerals. Suppliers shall make their reasonable country of origin inquiry and due diligence measures available to customers upon request.

MANAGEMENT SYSTEMS

Infinera believes that sound management systems and commitments are key to enriching the social and environmental well-being of its supply chain.

Risk Assessment and Management

Suppliers shall develop and maintain a process to identify labor and human rights, health and safety, environmental and business ethics, information security, and legal compliance risks associated with their operations; determine the relative significance of each risk; and implement appropriate procedures and controls to control the identified risks.

Audits and Assessments

Suppliers shall perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors and next-tier suppliers to ensure compliance with this Code and the law.

Documentation and Records

Suppliers must create and maintain documents and records to ensure regulatory compliance and conformity to company requirements, along with appropriate confidentiality to protect privacy.

Supplier Responsibility

Suppliers must communicate the Code requirements to their suppliers and monitor supplier compliance to the Code.

We developed these requirements for our Suppliers based on our values and the following:

- *Responsible Business Alliance Code of Conduct available at responsiblebusiness.org*
- *Infinera's Corporate Social Responsibility available at infinera.com/social-responsibility*



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