

Environmental, Social, Governance (ESG) Report 2021



Table of Contents

Letter from Our CEO.....	3	Environmental Sustainability.....	22	Appendices.....	48
About Infinera.....	4	Product Sustainability and		Our Locations and Scope of	
Company Profile.....	4	Circular Economy.....	23	Environmental Data.....	48
Our Approach to Sustainability.....	7	Environmental Management.....	25	Membership of Associations.....	49
Our Sustainability Goals.....	8	Energy and Climate.....	26	GRI Content Index.....	50
Corporate Governance.....	10	Water Management.....	29	SASB Alignment.....	62
Sustainability Management, Governance		Waste Management and Recycling.....	30	TCFD Alignment.....	64
and Reporting.....	11	Social Responsibility.....	32	About this Report and External Alignment ...	66
Stakeholder Engagement.....	11	Our Workforce.....	33		
Materiality.....	12	Diversity, Equity, and Inclusion.....	34		
Business Ethics and Fair		Human Rights and Responsible			
Business Practices.....	13	Labor Practices.....	38		
Privacy and Data Protection.....	15	Conflict Minerals.....	39		
Responsible Sourcing and Supply		Health and Safety of Our Workers.....	40		
Chain Management.....	16	Employee Development and Engagement..	44		
Product Quality and Customer Satisfaction..	18	Employee Benefits and Compensation.....	45		
Product and Safety Compliance.....	20	Community Engagement.....	47		

Letter from the CEO

At Infinera, our vision of connecting the world with unlimited bandwidth for everyone carries with it tremendous opportunities – and responsibilities. We play a key role in making life better for our customers and the communities in which they operate, thrive, and innovate. Each and every one of our colleagues around the world is a partner in the success of these communities. In the past year, we have continued to harness the innovation and purpose of our global team to build on the environmental, social, and governance programs that constitute the foundation of our vision of sustainability. I'm excited to share with you the progress we're making on the path to achieving our long-term ESG goals.

Our People

Diversity is one of our greatest strengths as a global team. Our wide breadth of talents and perspectives enables us to solve problems with and for our customers. We foster that diversity through both formal programs and our culture of innovation, continually challenging conventional thinking to create sustainable value. Our progress in building diversity, equity, and inclusion (DE&I) resources and activities this year has continued. We have created tools for our global teams to develop and implement local DE&I resources and expanded our employee resource group (ERG) program. We have established a new ERG for Latin American employees as well as scaled our programming for existing employee resource groups, better supporting the interests of diverse populations within Infinera while creating opportunities to educate and share insights with allies and the company at large. We have also

advanced our global learning and development program with input from diverse internal groups and achieved a 78% training rate, further raising employee awareness of DE&I as being critical to our growth as a company.

Our people are the heart of Infinera, and the passion and generosity of our team around the world continues to humble and amaze me. From supporting technology education in South Africa to promoting health care in India, and many activities in between, we continue to make an impact on the communities and people we serve.

Our Planet

We believe that the best way to play an active role in protecting our environment is to understand our impacts and the options available to address them. Our global teams continue to invest in a data-driven approach to measuring and understanding our environmental footprint and finding opportunities to make improvements. We are continually expanding the scope of our data collection to support these efforts. One example of this commitment in action is our newest waste management initiative for hydrofluoric acid – through increased capacity, we're able to reduce resulting environmental impacts and risks. We are also focused on collaborating and engaging with our customers, partners, and suppliers on the important work of reducing greenhouse gas emissions throughout our value chain.

Our Commitment

We continue to share our ESG goals, programs, and results with our stakeholders through a

number of frameworks and disclosures, including the report you're reading now. We participate in the CDP as well as complete EcoVadis and TIA annual assessments to gauge our progress and performance within the context of our ecosystem and our industry more broadly. We're also facilitating disclosures and transparency throughout our value chain by requiring our top suppliers to respond to EcoVadis surveys and track a number of ESG factors that can help identify risks and opportunities. Our cross-functional ESG team, led by our senior executive team and comprising a wide variety of subject matter experts, continues to lead our company in anticipating and meeting the expectations of our customers, investors, employees, and other key stakeholders.

Despite the complexities and challenges faced this past year, our ESG achievements in 2021 serve as strong validation that our programs are having a positive impact. Our team once again came together to advance efforts to create a connected and diverse world of unlimited bandwidth and a more sustainable future for all. Your support will be critical as we continue the work that is in front of us.

David Heard

Chief Executive Officer,
Infinera



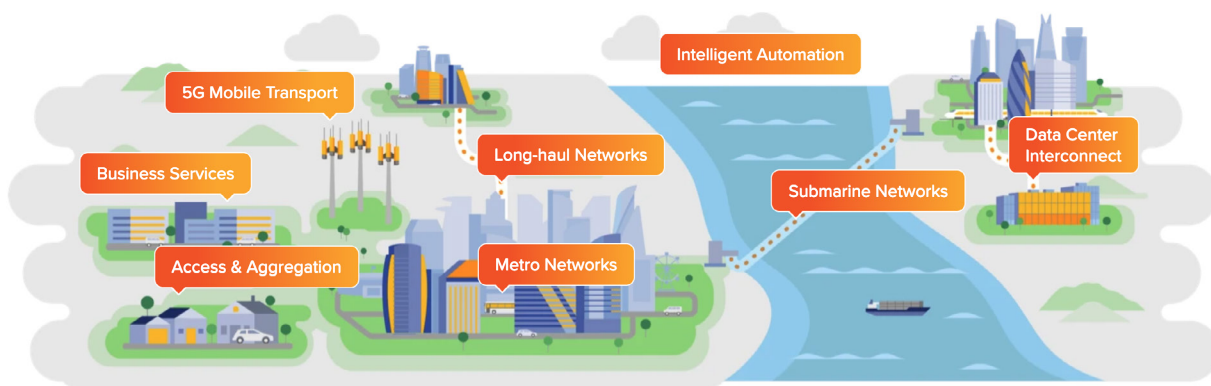
Company Profile

Infinera is revolutionizing telecommunications networks with innovative, industry-leading connectivity solutions including high-end subcomponent technology, systems for network infrastructure, automation software, and professional services. Our company is a global supplier enabling service providers, cloud operators, governments, and enterprises to scale network bandwidth, accelerate service innovation, and automate network operations. We continue to scale and expand our world-class offerings to meet the evolving needs of more than 1,000 customers in over 100 countries across six continents.

Our Solutions

Infinera brings instantly scalable, always available connectivity to users and applications everywhere. With a commitment to open networking and proven software-defined automation capabilities, Infinera is redefining service speed and agility as infrastructure networks scale to meet the demands of a new generation of end-user services.

Our solutions are built upon leadership in vertical integration, superior optical performance, and a unique Instant Bandwidth operational model to enable the lowest total cost of ownership and a rich end-user experience.



The Infinera Experience

Our promise to our customers for a truly differentiated business relationship – from **groundbreaking technology** and **networking innovations** to a **relentless focus on customer experience** and an obsession to ensure our **customers' success**.

Infinera at a Glance (as of December 31, 2021)

INFN on Nasdaq	\$1.4B+ in revenue	Over 3,000 employees worldwide	Over 1,000 customers served
7 of the top 9 ICPs	Over 40 years of experience	9 of the top 10 service providers	45+ countries with operations

Our Global Sites

The map shows our Tier 1 and Tier 2 sites around the globe, as well as our corporate headquarters. Tier 1 sites are defined as sites with high EHS complexity and hazards, laboratories, and manufacturing facilities, and Tier 2 sites are defined as sites with low to medium EHS complexity and hazards, offices, and laboratories. For a full list of our locations, please visit [Appendix A](#) of this report.



Vision, Mission, and Values

We have a vision to build a connected world with unlimited bandwidth for everyone – everywhere, always, and instantly.

To achieve this vision, we follow our mission to lead the industry into an era of open optical networking — a simplified, open, and modular approach to delivery innovations that fundamentally change the economics and agility of networks to provide meaningful value to our customers and shareholders.

Our values are integrated into every aspect of our business:

Drive for Results

We are aggressive in the pursuit of our goals, and we value achievement. We're focused, we're resilient, and we're persistent.

Customer-centric Focus

The success of our customers is paramount, and we will do everything necessary to honestly earn our customers' business.

Pioneering Spirit

We are courageous and we take risks. We solve problems others are afraid to solve or can't even see.

Honesty and Humility

We hold ourselves to the highest standards of conduct and behavior in every action, interaction, and aspect of our work.

World-class Quality

We are committed to ensuring the highest standards of quality at all times and in all ways.

Teamwork

We are a team of "doers." We don't wait to be asked or told. We roll up our sleeves and we get stuff done. We are comfortable with cross-functional structures, regardless of title or level, and we work as a team to make things happen.



Our Approach to Sustainability

The world is facing critical challenges, from climate change to social inequity. Infinera is committed to engaging with partners throughout our value chain to increase our positive impact while minimizing our risk exposure.

Corporate Responsibility Throughout the Value Chain

Across the globe, our suppliers play a vital role in the success of our business, and we know how important it is to source responsibly, make deals ethically, and communicate our expectations of conduct to effectively manage social and environmental impacts and risks. On pages 10-21, we discuss our approach to ensuring our high standards of social responsibility, ethics, and human rights are met throughout our business and our supply chain.

To evaluate and minimize our environmental footprint, we examine and manage the impact of our business operations and our products through data-driven metrics and measurable public goals. We also consider the financial, regulatory, and continuity impacts of climate change on our business and our industry and are taking continuous strides to make a difference. On pages 22-31, we share how we mitigate and manage these risks through our robust global environmental management programs.

As a commitment to our people, we invest in the inclusion, development, and well-being

of our employees and communities around the world. Through our growing programs, we aim to reduce inequity, cultivate diverse and knowledgeable talent, and give back to those in need. Within Infinera, we strive to attract and develop a diverse and talented team to maintain a competitive advantage in the market, leverage different perspectives, and foster a collaborative working environment. See pages 33-47 for more information on our workplace and philanthropy programs.

Global Recognition of Our Sustainability Performance

Each year, for the past six years, we have submitted an ESG-focused disclosure of our corporate responsibility activities to EcoVadis, which scores our sustainability performance. EcoVadis is the world's most trusted provider of business sustainability ratings, intelligence, and

collaborative performance improvement tools for global supply chains. In 2021, we at Infinera were proud to have been awarded a gold medal in recognition of our sustainability achievements in the areas of Environment, Labor & Human Rights, Ethics, and Sustainable Procurement.

Infinera Recognized as One of America's Most Responsible Companies

We're proud that in 2021, Newsweek recognized our efforts in environmental and social responsibility, by ranking us #27 in the Technology Hardware sector with an overall score of 73.7/100.



Our Sustainability Goals

We are committed to meeting the growing expectations of our stakeholders and we set regular ESG goals and track annual progress to ensure we address our key stakeholders' concerns. These goals are set every three years based on the results of our most recent materiality assessment – a process that helps us determine priority ESG topics to address. To drive success,

we set annual targets and track our performance, which we disclose in our annual sustainability reporting. In 2019, we set the goals shown in the table below for the 2020-2022 cycle. While 2020 and 2021 were challenging years for all of us around the globe, we are proud to continue advancing our sustainability efforts and reporting our ongoing progress on our goals. In each section of this report, we provide updates on the status of these goals.

Corporate Governance
Environmental, Social, and Governance (ESG) Management
Convene a cross-functional global working group to set goals and evaluate ESG-related topics and initiatives
Report our ESG efforts against the United Nations' Sustainable Development Goals by 2022
Business Ethics
Increase the disclosure of policies, principles, and internal controls
Improve our global participation rate in ethics training
Responsible Supply Chain
Incorporate ESG-related criteria in supplier audit checklists
Increase supplier diversity spend every year from 2020-2022
Work toward a 50% greenhouse gas (GHG) reduction in our supply chain
Environmental Responsibility
Product Sustainability
Assess opportunities to reduce impact of products and create relevant new initiatives
Climate Action
Reduce energy consumption and evaluate energy conservation initiatives at Tier 1 and Tier 2 sites

Environmental Responsibility (cont.)
Evaluate renewable energy opportunities in our global operations
Waste Management
Evaluate opportunities to reduce our environmental impact through improved conservation, recycling, and reuse of resources
Social Responsibility
Diversity, Equity, and Inclusion
Implement hiring initiatives to increase representation of women and underrepresented minorities
Launch a workforce empowerment program through internship opportunities
Employee Safety and Well-being
Achieve zero workplace injuries in 2020-2022
Improve our employee participation rate and response time for EHS training year over year
Employee Engagement and Organizational Health
Implement global site leadership program to solidify company culture, communication, and empowerment
Improve employee engagement and accountability
Giving Back
Implement a new community engagement program



Our ESG Goals: ESG Management	
2022 Target	Our Progress in 2021
Convene a cross-functional global working group to set goals and evaluate ESG-related topics and initiatives	In 2021, our Global Quality and Sustainability team continued to convene quarterly to report progress on our goals, share best practices, and develop our ESG strategy
Report our ESG efforts against the UN SDGs by 2022	In 2021, we conducted an executive alignment session as an important step in our materiality assessment. The materiality assessment, which will include an alignment exercise to the UN SDGs, will be completed in 2022

Sustainability Management, Governance, and Reporting

We have a responsibility to support our employees, our communities, and the markets we serve, and we recognize the influence we have in the industry as a global supply partner. This responsibility is something we take seriously, and something we see as an opportunity to prove our commitment to acting with integrity and leading with best practices. In our global operations and throughout our supply chain, we strive to uphold a high standard of environmental stewardship and social responsibility – fostering a culture of ethical decision making and mutual respect.

Our commitment to sustainability and social responsibility begins at the highest levels of company management and is supported throughout the company, where it is reinforced within our company culture. Working together, our executive leadership team and global site managers set data-driven sustainability goals and guide program strategies, which are implemented and monitored by our Global Quality and

Sustainability team. Throughout our company and in cross-functional collaborative forums, which include members from our Environmental Health and Safety, Quality and Sustainability, Human Resources, Facilities, Legal, and Supply Chain Management teams, employees are empowered to make ethical decisions, prioritize sustainability, and manage, monitor, and report out on sustainability topics.

We are proud to be ethical and honest, and we believe transparency in our performance fosters accountability for our company and trust with our stakeholders. In our most recent materiality assessment, we identified Transparency in Sustainability Reporting as a material topic and are always working to improve the accessibility, salience, and readability of our sustainability disclosures. In 2020, we submitted our inaugural response to CDP – the industry leader in climate disclosure – to maintain accountability for our climate progress. In 2021, we submitted CDP’s full climate change disclosure and made our score public to remain accountable to our stakeholders. Every year, we publish our sustainability report,

which shares our progress on our sustainability goals, programs, activities, and metrics.

Stakeholder Engagement

Our valued stakeholders include our customers, employees, shareholders, suppliers, partners, and the local communities in which we operate. Through numerous channels of communication, we engage these critical groups through consistent and meaningful connections that build trust, share knowledge and best practices, and strengthen our relationships. Some of these communication channels include surveys, quarterly meetings, annual forums, audits and assessments, public disclosures, and regular materiality assessments, which help us identify the sustainability issues that matter most to our stakeholders.

Over the last two years, as the COVID-19 pandemic impacted in-person communications, we maintained engagement with our stakeholders through forums, video conferences, and surveys to maintain our relationship and support their priorities during this difficult time.

Materiality

In order to maintain alignment with our key stakeholders, including our customers, employees, shareholders, and communities, we conduct a third-party materiality assessment every three years, or whenever there are significant changes to our company, our industry, regulation, or the sustainability landscape. In our most recent assessment, conducted in 2018, we prioritized material topics in the categories of environment, human capital, social capital, business model and innovation, and leadership and governance, based on how important the topics are to our stakeholders and how impactful the company's actions are on the topic. The priorities defined

in this assessment guide the development of our sustainability strategy and the content of our sustainability communications.

The framework of our materiality assessments follows industry standards and guidelines set by the Global Reporting Initiative (GRI) and Sustainable Accounting Standards Board (SASB). This framework provides us an opportunity to survey our stakeholders using a comprehensive set of industry-aligned topics and in-depth discussions with each party. We value the feedback that we receive from our stakeholders, as it enables us to align our ESG strategy, goals, and initiatives to their expectations, and allows us to become a more inclusive, sustainable, and socially responsible company.



Our Material Topics

In the table below, we share the ESG topics that were identified as the most material to our stakeholders in our 2018 assessment. These materials topics were aligned to our 2020-2022 goals to ensure consistent progress, which is reported publicly in this annual sustainability report. Unless otherwise noted, the boundary of each topic includes all Infinera entities and locations. Due to the impacts of COVID-19, we have scheduled our next materiality assessment to be completed in 2022.

Corporate Governance
Business ethics
Transparency and reporting
Supply chain management
Data security
Product safety and compliance
Environmental Responsibility
Greenhouse gas emissions
Energy management
Waste and hazardous materials management
Environmental compliance
Social Responsibility
Employee health and safety
Employee development and engagement
Diversity, equity, and inclusion
Labor practices and human rights

Our ESG Goals: Business Ethics	
2022 Target	Our Progress in 2021
Increase the disclosure of policies, principles, and internal controls	We continued to improve access to company policies for employees and communicate any changes through multiple channels to reach all employees, including Yammer, newsletter, posts on our internal hub, and more
Improve our global participation rate in ethics training	In 2021, our global participation rate in ethics training was above 95%

Business Ethics and Fair Business Practices

We embed our values of strong ethics and personal accountability into everything we do and how we work. At Infinera, we encourage a culture of transparency, integrity, and honesty through engagement with our stakeholders across the globe to maintain and grow these values. Leadership through our executive team demonstrates our commitment to integrity, ethics, and compliance. In 2021, we continued our focus on unifying policies to ensure global continuity and consistency. For example, in India, we collaborated with our local employees to verify continuity between policies, reporting, and local committees on the ground in the region.

At Infinera, we aim to follow the highest industry standards and be proactive in our compliance activities. In 2021, we continued a voluntary initiative to expand our disclosure of policies and principles, making them more accessible to internal and external audiences. In addition to publishing our [Code of Business Conduct](#)

and Ethics, our [Partner Code of Conduct](#), [Global Supply Chain Management Supply Chain Sustainability Policy](#), our [Purchasing Ethics Policy](#), along with others, are publicly available online. In the next year, we plan to make enhancements to our due diligence for third-party partners, to include systems integrators, service providers, and more, thus ensuring that our customer-facing partners maintain the high compliance standards that our customers expect of Infinera.

Code of Business Conduct and Ethics

Our Code of Business Conduct and Ethics defines our commitment to and expectations for employees in all operations, subsidiaries, and business affiliates worldwide. Our Code includes four sections pertaining to integrity and compliance:

- [Infinera’s Commitment to Acting Ethically](#)
- [Making Decisions Honestly and Ethically](#)
- [Protecting Infinera Information and Infinera’s Assets](#)
- [Be Safe and Reliable](#)

While we recognize that our Code of Business Conduct and Ethics may not address every possible situation an employee may encounter, it provides guidance for the most common ethical situations based on our company’s values. We completed our annual review of the Code to ensure we provide a comprehensive, global perspective. Through continuous training opportunities, we empower our employees and hold them accountable to making responsible decisions using ethics and honesty as guiding principles.

Reporting Concerns

We empower each employee to report any witnessed or suspected wrongdoing to ensure the highest levels of integrity. Under our whistleblower protection and non-retaliation provisions, any employee, supplier, or other party is encouraged to anonymously report concerns and violations of our policies. Anyone who believes they are aware of conduct that violates our legal duties is encouraged to raise concerns without facing harassment, discrimination, or retaliation.

Our whistleblower policy is accessible to all employees on our internal intranet. Our reporting platform, EthicsPoint (hosted by a third party), is available in every country in which we operate, and in local languages. We also collaborate with our local HR teams to ensure that this reporting mechanism and our ethics policies are communicated with employees and that those employees understand the protections the whistleblower policy provides.

Compliance and Risk Management

We take seriously our compliance with applicable laws and regulations in every jurisdiction in which we operate. By maintaining a strong culture of honesty, integrity, and compliance, we conduct our business with the highest standards of ethics. We also implement compliance best practices in our industry, to stay ahead of regulation and ensure ongoing compliance around the globe. In 2021, when the EU Whistleblowing Directive was implemented, we conducted a review of our policies and practices and found no revisions were needed, as we continuously uphold the highest standards for compliance.

We work diligently with our supply chain to ensure forced labor and human trafficking are not taking place in our supply chain. We comply with all applicable laws, including the California Transparency in Supply Chains Act 2010 and the UK Modern Slavery Act 2015. We had no confirmed cases of breaches to our Code of Business Conduct and Ethics in 2021.

Each member of the Executive Leadership and Legal teams is responsible for the management of day-to-day risk mitigation. Our Board of Directors, as a whole, is responsible for the oversight of our overall risk management strategy and each of its committees considers and manages any risks that may be within its area of responsibility. Please review our most recent [proxy statement](#) to learn more about Infinera's governance approach.

Ethics and Compliance Training

We provide accessible and comprehensive training and knowledge resources for our employees to enable them to make smart and ethical decisions. Through the collaboration of our Human Resources and Legal teams, our employees are engaged in role-appropriate training as needed on compliance-related issues and policies, including our Code of Business Conduct and Ethics and anti-corruption policies. Through mandated, accessible online training modules, our people managers can ensure



their employees are assigned to and complete appropriate job-related compliance training based on their individual responsibilities. These training modules cover topics including workplace ethics, anti-corruption, insider trading, privacy concerns, anti-harassment awareness, and more. In 2021, our Human Resources and Legal teams worked closely together with our executive leadership team to ensure employees completed all training requirements quarterly. This approach resulted in an increase in training completion rates during the course of the year.

Privacy and Data Protection

We take seriously the protection of personal data for all stakeholders we interact with and strive to respect privacy rights, as well as protection

against unauthorized access, use, retention, and disclosure. Our commitment to stakeholder privacy is demonstrated throughout the value chain as a key part of design and development, installation, deployment, and sales. As we've continued working from remote environments in 2021 and 2022, we have included potential risks into our enterprise risk management and data protection policies. To advance data security in these environments, we have increased our data protection measures through the implementation of technical measures and additional training for our employees, including courses that cover phishing and social engineering topics.

We have also continued managing compliance and implementation of the General Data Protection Regulation (GDPR) throughout

our operations, as well as other data privacy regulations in effect in other jurisdictions, through our global working group. The focus of this group is to ensure full compliance with various global regulations and monitor the development of future data privacy laws.

Infinera utilizes a risk-based approach to cyber security to identify and mitigate risks that are unacceptable. This year, in the spirit of continuous improvement and to address the growing demand for increased information security protocols, we have strengthened our supply-chain management program and plan to achieve certification to Information Security Management System (ISMS) ISO 27001 by the end of 2022.

In 2021, we had no material breaches that resulted in a loss of customer data.



Our ESG Goals: Responsible Supply Chain	
2022 Target	Our Progress in 2021
Incorporate ESG-related criteria in supplier audit checklists	In 2020, we added 10 ethics questions and 10 environmental questions to our supplier audit checklist. Among those environmental questions are requests for GHG emissions, certifications, energy reports, waste and water use and reductions, environmental impacts, and environmental targets to secure continuous improvements. In 2021, we expanded on this effort, requiring our top 45 suppliers to complete an EcoVadis sustainability questionnaire, covering a range of ESG topics
Increase supplier diversity spend every year from 2020-2022	In 2021, COVID brought challenges to our diverse supply base. We continued in our efforts to find ways to expand our supplier diversity program and our pursuit to work with qualified diverse suppliers
Work toward a 50% greenhouse gas reduction in our supply chain	In 2021, we began requiring our top 45 suppliers to complete a sustainability questionnaire through the EcoVadis platform, which collects information on emissions, energy efficiency initiatives, and climate strategy

Responsible Sourcing and Supply Chain Management

We aim to apply the industry’s best practices for a responsible supply chain through our robust, global supply chain management program. Through close collaboration with our customers and suppliers, we exemplify our commitment to upholding rigorous standards, protecting human rights, and demonstrating environmental stewardship. We know that our commitment and our high standards help us create mutual trust with our business partners, and we value the strong and collaborative relationships with our suppliers.

Supplier Engagement and Due Diligence

We expect our suppliers to conduct business with the same standards of integrity and ethics that we apply to our own operations, and work with them

to develop best practices in ethics, environmental management, labor, and human rights. We ensure these practices are met in our supply chain through supplier assessments, audits, and engagement forums to ensure accountability. In 2022, we resumed our regular audit schedule and re-instated frequent business reviews on our usual cadence – both of which had been affected by COVID-19 over the last two years.

Our Supplier Code of Conduct (CoC) clearly outlines our expectations of suppliers and communicates our requirements to act ethically and in compliance with applicable laws and regulations for labor standards, health and safety, environmental issues, business ethics, and management systems. We require our key suppliers to apply our code of conduct to their first-tier suppliers and subcontractors, including providers of contract labor. We expect suppliers

to be transparent about their compliance with our code and our standards through self-assessment, disclosure, and third-party audits. Before we approve key suppliers of components and purchased assemblies, they are first screened for compliance with our Supplier Code of Conduct.

Supplier ESG Assessments

Our key suppliers are expected to be transparent about their performance relative to top environmental, social, and governance issues and their progress on the topics that are material to Infinera. As a part of our supplier audits, we require our key suppliers to report their GHG emissions to CDP, as well as their waste, energy usage, and water usage. We also require suppliers to disclose their sustainability priorities, goals, and progress and to cooperate with our efforts to monitor their conformance, which include on-site assessments, questionnaires, and surveys.

In 2021, we launched a comprehensive ESG assessment for our top 45 suppliers (which covers approximately 90% of our spend). Through the EcoVadis platform, suppliers are required to report their management approach, goals, progress, and metrics on key sustainability issues in the areas of Environmental, Labor & Human Rights, Ethics, and Sustainable Procurement. We look forward to using the results of these assessments to inform our supplier engagement and assessment strategy.

We reserve the right to disqualify any potential supplier or terminate any relationship with a supplier that has failed to meet these standards. We believe that collaboration throughout our supply chain on sustainability and environmental transparency multiplies our progress and look for opportunities to strategically partner with our suppliers for positive impact.

Supplier Surveys and On-site Audits

In addition to administering ESG assessments, we conduct regular on-site audits of our major contract manufacturers and key suppliers to ensure the implementation of responsible supply chain practices. These surveys and audits serve to assess and evaluate supplier performance on topics including safety practices, compliance, labor conditions, child labor, human trafficking, and their alignment with the Responsible Business Alliance’s Code of Conduct as well as our Supplier Code of Conduct. We consider supplier performance in these areas when selecting contract manufacturers and suppliers, and actively monitor compliance through our internal audit

2021 Summary of Ethics and Compliance Reviews, Trainings, and Issues	
Percent of strategic suppliers reviewed	100%
Percent of requested suppliers that completed or are in the process of completing the EcoVadis questionnaire	95%
Suppliers compliant with Infinera’s Supplier CoC, based on our supplier reviews	95%
Infinera procurement personnel trained in business ethics	100%
Number of instances of noncompliance	0
Number of supplier terminations over ethics or ESG issues	0

program. We also require that suppliers provide documentation to verify ISO compliance, which is another layer of due diligence in our auditing process. During the COVID-19 pandemic, we pivoted to conducting virtual audits as traveling and social distancing requirements have made in-person audits a challenge, but have resumed in-person audits when safe and possible.

We are committed to ensuring that all workers in our value chain, our operations, and at our supplier facilities are treated with dignity, respect, and with regard to human rights. This includes our support of the right to free choice of employment, the right to free association, and the right to be free of harassment and unlawful discrimination. We work diligently to ensure these rights are respected by our management systems and those of our suppliers.

Supply Chain Resilience

Over the last two years during the COVID-19 crisis, our supply chain management teams have worked tirelessly to prioritize the safety of our employees, customers, and suppliers while ensuring the timely delivery of our essential goods through a resilient supply chain. Throughout 2021, our teams held regular in-depth review sessions with our suppliers to resolve challenges and address risks quickly and with precision. During these difficult times, the diversity, resiliency, and agility of our supply chain have enabled us to be nimble and successful when a globally connected world is more important than ever. Though our supply chain experienced impacts from COVID-19, we are proud that we continue to overcome challenges to meet the needs of our customer community.

Product Quality and Customer Satisfaction

Product Quality and Reliability

With a customer-centric focus, we aim to maximize customer alignment and satisfaction with our products and services. Our end-to-end global quality structure prioritizes engagement with all functions and processes; incorporates quality best practices, process expertise, and sustainability; and covers the full customer journey across the product lifecycle.

Our product quality assurance and customer satisfaction programs are managed by Infinera's Global Quality and Sustainability team, which also leads the strategy, goal-setting, and program execution of our sustainability program. Around the globe, this team works with executive management, internal teams, operations, business groups, and sustainability experts to deliver world-class performance, quality, reliability, and value for our customers and stakeholders. We strive to integrate sustainability into all our operations, robust processes, and operational controls, and through this team, we can ensure that we successfully deliver.

In 2021, we made numerous improvements to our Quality program, including implementing a new tool that collects and analyzes customer feedback on nuanced areas, providing us an Infinera Experience Index, which allows us to better improve. Results of this feedback are analyzed internally and reviewed at the CEO level, and corrective actions are assigned if necessary. In



2021, we exceeded our index score goal and look forward to continuing to improve to better serve our customers.

Our Quality Certifications

Since 2007, we have been certified to the Telecommunications Industry Association's (TIA) TL 9000 quality management system (QMS) to ensure our alignment with the supply chain standards of the information and communications technology (ICT) community. We have all three specialty options, including "Hardware," "Software," and "Service," with no exclusions

or exemptions. We apply all the TL 9000 requirements and measurements to our product quality and customer satisfaction practices, using reviews, surveys, audits, and business reviews for direct customer feedback. Over the past few years, we have expanded our TL 9000 certification program to include more of our global sites – some of our sites, including those in Australia, Israel, and Italy, are certified to the local ISO 9001 standard. In 2022, we are upgrading to TL 9000r6.3 to meet the newest sustainability requirements. We plan to increase our capabilities and our resources to ensure full alignment in the years to come.

Infinera is also an active member of TIA through employee representation. As a member, Infinera provides direct feedback for review and improvement of the TL 9000 standard. Some of our sites, including those in Australia, Israel, and Italy, are We are also a member of TIA's sustainability workgroup, which allows us to collaborate with leading companies in the ICT sector on best practices, quality benchmarking, and the promotion of excellence in the industry.

ISO 14001 Certification

In 2021, we certified our operations to ISO 14001. Our environmental activities are based on lifecycle thinking and sustainable development, with the goal of continually reducing the adverse environmental effects of Infinera products during creation, manufacturing, delivery, use, and ultimate end-of-life disposal. Our global approach to health and safety fosters the belief that everyone has the right to work in a safe and healthy environment. Safeguarding the health and safety of employees, contractors, visitors, sub-contractors, suppliers, business partners, customers, investors, and communities is a fundamental concern of all levels of management.

Ensuring Customer Satisfaction

We have a vision of delivering world-class quality to our customers around the world, and we aim to exceed our customers' needs and expectations at every stage of production, delivery, and service. Guided by our [Quality Policy and Global Quality Mission](#), and through collaboration with our business partners, we're able to develop better

products to meet customers' changing needs for performance, compliance, quality, reliability, and ease of doing business.

We know our customers value the opportunity to conduct business sustainably, and we're proud to be able to support their ESG goals. We work diligently to ensure a strong response to our customers' increasing design specifications for energy use requirements, restrictions on hazardous substances, and compliance with laws and regulations on conflict minerals, all of which we can swiftly respond to and account for. In 2021, we conducted multiple ESG training sessions for our sales representatives to ensure their competency on key ESG topics that are material to our customers. Our aim is to continue broadening this education within the company to further infuse sustainability into our culture, and into our business relationships.

To ensure the highest level of customer satisfaction, we engage with customers and employ measures in multiple ways, including the following:

- Disclose our sustainability performance to customers through CDP and EcoVadis questionnaires, and through annual reporting aligned with GRI, SASB, and the Task Force on Climate-Related Financial Disclosures (TCFD)
- Connect directly with customers' sustainability teams to align on goals and requirements for ESG-related topics
- Conduct comprehensive ESG materiality

TIA QuEST Forum Award

In 2021, the Telecommunications Industry Association (TIA) announced that two Infinera employees, Stephen Choy and Laura Coplon, were named **TIA QuEST Forum Fellow**. The lifetime designation is an honor that only 22 other people hold and recognizes their outstanding knowledge and contributions to TIA QuEST Forum. Last year, Infinera was also recognized for our contributions in the TIA QuEST Forum workgroups, sub-teams, and SCS 9001 standards areas. For this participation, we were proud to receive the TIA QuEST Forum award "Participant Company of the Year."

assessments every three to five years, in which customers can share their priorities and provide input on our key areas of focus

- Survey top customers quarterly to gain insight into overall satisfaction and quality metrics
- Hold quarterly operations business reviews (QBRs) that cover field performance, customer escalations, service outages, operations, quality, and reliability
- Conduct regular internal reviews using customer satisfaction scorecards, aligning them with our TL9000 metrics data
- Incorporate requests and suggestions into our product/service development lifecycle
- Mitigate risk by qualifying multiple sources of critical components, investing in supply chain diversity, and scoring suppliers using our proprietary risk tool
- Perform rigorous in-house quality control testing to establish the reliability of our products

World Class Quality Differentiates Infinera

We utilize both vertically integrated production facilities and qualified contract manufacturers to build our products. Because of this, and to mitigate risk during manufacturing, we maintain various quality, health and safety, and environmental management system certifications. As it pertains to quality control, we regularly perform in-house quality control testing to ensure the reliability of our products and to continue to be the trusted global partner in the networking space.

We identify and mitigate risk in our supply chain by qualifying multiple sources of critical components and scoring our suppliers using our proprietary risk tool. We maintain a consistent set of expectations and requirements throughout the value chain by conducting monthly risk reviews and maintaining a database of product specifications.

Product and Safety Compliance

Infinera's products, services, operations, and facilities are subject to local, state, federal, and international laws that exist to protect our employees, customers, consumers, and the environment. We maintain compliance with these laws and regulations through a comprehensive environmental program that consists of systems, processes, and tools to conduct data collection and reporting of product information. As a critical part of this program, we continuously update our system and collect data specifically for:

- Banned substances under the Directive on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS)
- Reportable substances under Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH)
- Waste management under the Waste Electrical and Electronic Equipment (WEEE) Directive

In 2021, we maintained our compliance with these environmental regulations. To date, we have not received notification of any product environmental violations related to RoHS, REACH, or WEEE regulations. We strive to stay ahead of regulation by staying up to date with information through industry groups and communicating with customers on compliance requirements.

RoHS

As a part of our RoHS compliance program, we practice thorough product lifecycle data management, certification of RoHS compliance, and diligent auditing of our contract manufacturers and suppliers. In 2021, we accomplished the following to improve our RoHS compliance:

- Reviewed over 47,000 components with supplier RoHS certifications of conformance to ensure their compliance with RoHS requirements
- Confirmed compliance of components to expiring RoHS exemptions to ensure product compliance with changing RoHS requirements
- Completed annual update to our Product Environmental Specification following RoHS updates and distributed to suppliers
- Further improved internal processes for accurate tracking of RoHS compliance products to ensure non-violations in countries with RoHS regulations

REACH

We have a robust REACH program that is designed to ensure we meet all compliance requirements. In 2021, we completed the following activities in accordance with REACH requirements:

- Continued our operational processes for supply chain REACH substance reporting purposes
- Verified that the chemical substance registrations are in place by the original substance producers as required by the REACH directive
- Collected data on REACH substances from suppliers for approximately 47,000 components used in products and identified substances of very high concern (SVHCs)
- Identified key components that are at risk for presence of REACH SVHC for each biannual update by the European Chemicals Agency and confirmed with suppliers on compliance status
- Continued our submissions to SCIP database for information on SVHC in articles under the Waste Framework Directive (WFD) to prepare for a circular economy

WEEE

We are registered with European countries as needed and have a robust recycling and take-back program. We also comply with product identification requirements such as labeling for all our products as required. In 2021, we maintained compliance with the WEEE directive and accomplished the following:

- Maintained WEEE registration in all EU countries, and re-registered in countries as required by local governance offices
- Continued to provide required monthly, quarterly, and annual WEEE reporting and payment for the sales of products into the EU

Environmental Sustainability

[About
Infinera](#)

[Corporate
Governance](#)

[Environmental
Sustainability](#)

[Social
Responsibility](#)

[Appendix](#)



Our ESG Goals: Product Sustainability	
2022 Target	Our Progress in 2021
Assess opportunities to reduce impact of products and create relevant new initiatives	Our ICE products have increased longevity and decreased power consumption

Product Sustainability and Circular Economy

We work to drive innovation and bring connectivity to everyone everywhere with the best user experience possible. We continue to develop and implement technology innovations that maximize the reach and capacity of our networks and allow us to reimagine architectures that improve performance while reducing power, equipment, and space requirements. We're excited to show, generation after generation, that improvements in density, optical performance, modularity, and pluggable optics integration allow us to make forward strides in sustainable network installation and operation.

Product Energy Efficiency

When we increase efficiency while increasing the reach of our networks, we enable a reduced total cost of ownership for our customers. Our Infinite Capacity Engine (ICE), for example, is a vertically integrated approach with a mean time between failures of approximately 41 years, exceeding industry reliability standards by a factor of eight. As well, increasing density over time allows for a decrease in power consumption of 25-30% with


Energy Efficiency with Innovation in Coherent Optical Technology

Infinite Capacity Engine (ICE)


MAXIMIZED CAPACITY / REACH

Optical Performance

60
YEARS
Meantime
Between Failure

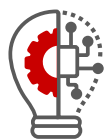


67%
FEWER
LASERS




Pioneering Point-to-Multipoint XR Optics

75%
LESS
POWER



65%
SMALLER
FOOTPRINT



each subsequent generation of embedded optical engine while increasing performance.

Deploying high-performance optics with a maximized capacity-reach means that signal regeneration over long distances is no longer required. This reduces the need for equipment at regeneration sites and their related power consumption. For example, the use of high-performance 800G optics can eliminate the need for two regeneration sites across a distance of 800 km, compared to 400G technology. For the same network performance (given capacity at this specified reach), Infinera solutions enable a 50% reduction in the number of sites, a 58% reduction in power consumption, and 67% fewer lasers. Furthermore, increasing the spectral efficiency of our products allows us to add more capacity to a network without the need for additional fiber, reducing environmental impacts associated with new fiber installations.

Comparing technology from the 2011 timeframe, the energy needed to process 100G has decreased from about 60 watts to 5-6 watts, a 90% savings for the same performance. We are also pioneering advances in coherent pluggable optics with XR optics. These much smaller devices have a compact footprint and consume less power. The XR optics approach also gives us the flexibility to enable new architectures and further design operational benefits while consuming 75% less power and using a 65% smaller physical footprint than competing coherent pluggables on the market.

Our Contribution to a Circular Economy

We're consistently looking for ways to extend the useful lives and improve the circularity of our products, so our sustainability strategy includes elements of circularity, including repair, refurbishment, and reusability. We are actively working to extend the lifecycle of our products, as with our ICE devices and compact modular systems. We also explore opportunities to recycle, repair, and refurbish products. Utilizing techniques like artificial intelligence and machine learning, we're working to improve our recycling process to harvest usable components from retired products.



Environmental Management

Through innovative technologies, resource efficiency, and robust data management, we are committed to reducing the environmental impact of our operations and reporting our progress every step of the way. At each of our sites around the globe, our Environmental Health and Safety leaders and site-level managers prioritize and address environmental risks based on a precautionary approach throughout our operations and supply chain. Using internal and external expert resources, we conduct regular reviews of our programs, procedures, and operations to confirm a consistently high level of compliance with all applicable local, state, and federal regulations, laws, and ordinances. To ensure the long-term success of our environmental program, we work diligently to ensure a standardized management approach is followed at each of our global sites with regard to data collection, implementing sustainable initiatives, and following best practices.

Our Data: Scope, Performance, and Baselines

In 2018, we undertook the acquisition of Coriant, which led to an expansion and subsequent contraction of our operations. Due to this acquisition, and an emboldened commitment to improving our environmental performance, our data collection and baselines varied greatly from year to year and did not accurately portray our ongoing efforts to reduce our environmental footprint. Since then, we've made tremendous

efforts to establish global 2020 baselines for our environmental data, including energy use, greenhouse gas and air emissions, water consumption, and waste generation and disposal. These new 2020 baselines will inform our reporting as well as the progress on our environmental goals. In the spirit of ongoing transparency and continuous improvement, we are restating some of our environmental data for 2020 and 2019, per the footnotes in the tables below.

For our 2021 environmental reporting, sites and EHS classifications can be found in [Appendix A](#) of this report. These sites are identified as Tier 1, 2, and 3 sites according to their key functions and risk levels. Below is a table summarizing the descriptions of these site categories.

EHS Site Classifications	
Tier 1 Sites	Sites with high EHS complexity and hazards Laboratories and manufacturing facilities
Tier 2 Sites	Sites with low to medium EHS complexity and hazards Offices and laboratories
Tier 3 Sites	Sites with very low EHS complexity and hazards Offices and customer demo labs



Relocating our Headquarters

In 2020, we relocated our headquarters from Sunnyvale to San Jose, CA. After experiencing delays due to the COVID-19 pandemic and California shelter-in-place mandates, we closed three of our Sunnyvale buildings, consolidated our operations, and relocated to one building as our new worldwide headquarters in San Jose, CA. Last year, we completed this transition and the move of our headquarters out of Sunnyvale. We found that on average, a move to South San Jose, CA would reduce our employee commute time by 18%, from 33 to 27 minutes. We continue to operate a fabrication facility in Sunnyvale.

Our ESG Goals: Climate Action	
2022 Target	Our Progress in 2021
Reduce energy consumption and evaluate energy conservation initiatives at Tier 1 and Tier 2 sites	We achieved a 13% reduction in energy consumption globally
Evaluate renewable energy opportunities in our global operations	We leveraged renewable energy sources for our sites in Richardson, Portugal, and Pennsylvania. We plan to continue renewable energy sourcing at sites across the globe

Energy and Climate

We are committed to making a positive impact on our environment to mitigate the impacts of climate change. We recognize that our greatest opportunity for advancing our sustainability efforts is to reduce our consumption of energy in our operations. Through our operational initiatives across each of our sites, we aim to be as energy-efficient as possible, minimize our consumption of energy, and utilize more renewable energy sources.

As our labs require a substantial amount of our total energy use, we focus on initiatives that reduce the energy required by our business operations and lab environments. These initiatives include providing shared access to equipment in our Stockholm laboratories to other Infinera sites and developing a simulator environment for new platform projects. We regularly and systematically review the hardware in labs to ensure unused equipment is decommissioned and monitor power usage in the labs. Office lights are also automatic switched off in the evenings to save on our power usage. Initiatives such as these help us meet our goals of reducing our overall energy use globally.



Energy Consumption Reduction in Australia

In 2021, our Infinera Australia team conducted an extensive energy consumption review, which helped us better understand and reduce our energy consumption at the site. As a result, our teams undertook efforts to minimize energy usage including the installation of energy-efficient globes, switching off unnecessary lights and equipment, reviewing window coverings and blinds to maximize energy efficiency, reviewing HVAC maintenance, and minimizing paper usage. In 2022, the team will continue to evaluate initiatives that reduce our footprint, including exploring opportunities to install solar panels on-site.

Our Emissions Performance

We are investing in a number of initiatives to reduce our emissions to support our customers' increasingly ambitious climate action goals as well as our own. We believe that transparency helps hold us accountable and challenges us to improve. In 2021, we submitted our first full disclosure to CDP, responding to their annual climate change questionnaire and making our response and score publicly available. We will use the lessons learned through the completion of this report to continue improving our emission reduction initiatives.

We benchmark our environmental intensity against industry averages and our historical data to evaluate where improvements can be made. In 2021, we are proud to have achieved 100%

carbon-free energy at four of our main sites, including two sites in Pennsylvania, U.S., and one site each in Stockholm, Sweden, and Espoo, Finland. As of September 2021, our site in Lisbon, Portugal is also 100% carbon-free. We have identified several sites in APAC and EMEA where we plan to advance initiatives to reduce energy consumption over the next year.

Building on our data collection protocols from 2020, we monitor our energy mix and usage at each site. This increased transparency enables us to make real progress in our performance. We continue to refine our data management processes and explore opportunities for reducing Scope 1, 2, and 3 emissions in our facilities worldwide. We are also engaging our supply chain teams to collect more accurate data on third-party

Supporting a 1.5°C World

As part of our commitment to the science and principles of the Paris Agreement and its goal to keep the earth's temperature below a 1.5° C increase from pre-industrial levels, we are working toward a 50% reduction in our Scope 1, Scope 2, and Scope 3 greenhouse gas emissions by 2030, from a 2020 baseline.

Energy Consumption (MWh)	2021	2020*	2019*
Electricity	54,097	57,368	57,628
Natural gas and fuel oil**	3,051	9,608	3,662
District heating and cooling	3,765	3,189	858
Total	60,913	70,165	62,148

Scope of data: We have included tier 1 and tier 2 sites and a limited number of tier 3 sites for our energy reporting

**We are restating our 2019 and 2020 energy data in this report due improved accuracy in data collection and reporting*

***Our natural gas and fuel oil metrics demonstrate an increase in consumption for 2020. This is due to the data collection of our site in Naperville, IL, which closed in 2020*



2021 Emissions by Scope 1, 2 & 3* (Tons of CO ₂ Equivalents [tCO ₂ e])	2021	2020**	2019
Fuel burned on site (S1)	559	1,755	666
Facilities (energy use) (S2)	19,866	21,294	19,346
Scope 3	33,444	29,620	24,574
Total emissions	53,869	52,669	44,586

Scope of data: We have included tier 1 and tier 2 sites and a limited number of tier 3 sites for our emissions reporting

*S1, S2, and S3 stand for Scope 1, Scope 2, and Scope 3 according to GHG protocol. Calculations are location-based.

**We are restating our 2020 emissions data in this report due improved accuracy in data collection and reporting for our energy data

2021 CO ₂ Emissions Intensity Key Performance Indicators (Scope 1 and 2)	
Reference data	KPI
686,429 square feet of operational space	0.03 tCO ₂ e per square foot of operational space
3,258 full-time equivalent employees	16.53 tCO ₂ e per full-time equivalent employee

suppliers’ emissions, through the use of third-party reporting platforms including EcoVadis and CDP.

We note that our absolute GHGs vary over time and often correspond to the expansion or contraction of our organization. Therefore, to contextualize our impact, we use reporting metrics and key performance indicators (KPIs) that take these factors into account and monitor our absolute emissions as well as our relative

GHG emissions intensity, normalized to our global footprint and employee headcount. For our GHG emissions, calculations utilize a location-based method, which takes into account the mix of energy sources available on local grids. Our semiconductor fabrication facility in Sunnyvale, California is subject to air emissions permitting requirements, and our rigorous management system ensures its continued compliance with permit conditions, regulations, and rules.

Employee Transportation

Each year, we conduct a voluntary employee commuter survey to gain visibility on our employees' transportation habits and emissions footprints. In 2021, we adopted remote and hybrid work environments as an ongoing option for our employees, and we anticipate this will support Infinera's goals to minimize our emissions resulting from commute trips. Opportunities like this, and other transportation program alternatives, are informed by our commuter survey. Additional initiatives to reduce our employee transportation greenhouse gas emissions include:

- We encourage bike commuting through bike lockers and showers at select facilities, as well as supporting bike-riding events
- We have installed electric vehicle charging stations for employees to use free of charge in California and Pennsylvania
- Our federal commuter benefits program for our employees in the United States provides a match of 50% of the available subsidy; this program allows flexibility across all available transit modes

Water Management

Through our semiconductor fabrication, our operations require purified (deionized) water for their processes. We focus our water management efforts on maximizing water efficiency at our fabrication facility to conserve water wherever possible. Through the collection of our water

consumption data, we continue to evaluate process water-saving opportunities and identify where improvements are needed.

Additionally, we leverage water-saving appliances and practices in our offices and design facilities. In our kitchens and bathrooms, we take advantage of local utility rebate programs to implement low-flow solutions. For landscape irrigation, we use city-recycled water wherever possible. At our California facilities, we continue to take advantage of xeriscaping principles to conserve water. We also engage our employees and increase awareness of the importance of conservation by placing educational signs at our sites.

Our industrial wastewater is treated through our permitted on-site acid waste neutralization system, which discharges to the local publicly owned treatment works or municipal sewage treatment plant.

Infinera Celebrates Earth Day 2021

On April 22 of 2021, we recognized Earth Day as a day of action to change human behavior and create global, national, and local policy changes. Infinera's Green Team encouraged employees around the world to take part in this special day and celebrate the natural world around us. Employees shared their experiences of planting gardens, taking walks to discover native plants, and educating themselves and each other on ways to help protect our planet and inspire change.

Water Consumption (Cubic Meters)	2021	2020*
Total Consumption	23,526	31,494

Scope of data: We have included water data from all global sites in scope for environmental reporting as available. Does not include Canada, China, or Maryland, U.S.

**We are restating our 2020 water consumption data in this report due improved accuracy in data collection and reporting. The difference in water consumption between 2020 and 2021 is largely attributed to the closure of our Sunnyvale buildings and it not representative of normal usage trends*

Our ESG Goals: Waste Management	
2022 Target	Our Progress in 2021
Evaluate opportunities to reduce our environmental impact through improved conservation, recycling, and reuse of resources	Through site-level initiatives, we installed new equipment, implemented waste-reduction initiatives in offices, and engaged with employees remotely to reduce the impact of our office environments

Waste Management and Recycling

We understand how waste disposal affects our overall environmental impact and we seek to make continuous improvements in our waste disposal practices. We leverage a variety of methods to minimize the waste sent to landfills, based on the type of waste generated and access to local vendors. Our production and office wastes, such as cardboard and paper, scrap metal, and foam, are sorted and recycled. At select sites, our electronics are recycled with a local partner for deconstruction and reuse. Hazardous wastes are handled by authorized and qualified service providers.

In 2021, we completed the final closing procedures and reporting for our Sunnyvale, CA facilities as part of the relocation of our headquarters to San Jose, CA. We received final approval from the City of Sunnyvale that no remediation or decontamination activities were required for the three facilities that were closed.

Sustainability in Our Optical Management Group

In recent years, our Optical Management Group has increased its focus on reducing the environmental footprint of the fabrication processes at our photonic integrated circuit (PIC) fabrication plant. In addition to maintaining strict chemical input and output processes, we've implemented practices that help us reduce, recycle, and reuse materials.

Our PIC manufacturing process requires the use of gold and other precious metals and in 2021, we began partnering with a new third-party partner to improve our recovery rate for these precious metals. With the help of a proprietary cleaning process, we have consistently achieved an 80-90% recovery rate on shielding parts. This is a 30% increase from our previous recovery rate of 50-60%. This new recovery rate will require less mining activity for the precious metals we consume, which means less environmental impact from our business operations.

Waste Generation (Metric tons)		
Non-Hazardous Waste	2021*	2020*
Recycled	136.86	139.5
Compost	18.88	17.0
Incinerated	168.47	169.6
Landfilled	109.17	84.0
Total	433.38	410.0
Hazardous Waste	2021	2020
Recovery off-site	0.00	18.2
Incineration off-site	0.62	3.9
Other off-site treatment	71.01	71.2
Landfill	1.44	1.9
Recycled	9.66	6.3
Total	82.73	101.4

**We are restating our 2020 and 2021 waste data in this report due improved accuracy in data collection and reporting. We previously published a version of this report that stated incorrect figures for our waste data. That has been corrected in this table.*

Managing Our Hazardous Waste

We comply with local hazardous waste disposal requirements and aim to implement best practices. In 2021, we installed an additional hydrofluoric acid (HF) waste tank capacity at our Sunnyvale, CA fabrication facility, which will reduce our risk exposure for environmental issues and enhance our emergency preparedness. This also enabled us to reduce the frequency of our on-site pick-ups to minimize fuel consumption and air emissions from the transportation of the waste. This project is still in progress.

Legend for Non-hazardous Waste	
Recycled	Paper, cardboard, plastic bottles, cans, and printer cartridges
	Polyurethane and non-polyurethane foam from office, shipping, and receiving
Composted	Food waste
Incinerated	Mixed non-hazardous trash
Landfilled	Mixed non-hazardous trash
Legend for Hazardous Waste	
Recovery off-site	Solvent waste (fuel blended or recycled off-site as feedstock)
Incineration off-site	Flammable wipes, corrosive wipes, lab-packed and used in cleaning of equipment
Other off-site treatment	All other hazardous wastes
Landfill	Examples such as wafers and solid materials not able to be incinerated

Waste Generation Intensity for 2021	
Non-hazardous Waste	Per Headcount*
Recycled	0.04
Compost	0.01
Incinerated	0.05
Landfilled	0.03
Total	0.13
Hazardous Waste	Per Headcount*
Recovery off-site	0.00
Incineration off-site	0.00
Other off-site treatment	0.02
Landfilled	0.00
Total	0.03

*Normalized to 3,258 full-time employees

We restated our 2021 waste data in this report due to improved accuracy in data collection and reporting. We previously published a version of this report that stated incorrect figures for our waste data. That has been corrected in this table.



We believe human connection sustains our work and inspires our commitment to uplift our global community. With honesty, humility, and teamwork at the center of our work, we continue to cultivate our culture of individual responsibility and mutual integrity. Our talented, diverse, and dedicated workforce is empowered to make meaningful impacts through their work, supported by robust employee health and safety, as well as our scalable human resources structure as the backbone of our success.

Our Workforce

Our global workforce integrates collaboration and innovation into every effort and every operation. We strive to build a dynamic and engaging environment that supports our success in attracting, retaining, and developing top industry talent. As we continue to grow, we are committed to building and maintaining a safe, collaborative, and innovative community.

By the end of 2021, we had a total of 3,258 employees working at over 30 sites across the globe. We continuously enhance our financial infrastructure and operating and administrative systems to ensure our ability to manage workforce data and compensation practices in alignment with the growth of our business.

Our Employees*	2021	2020	2019	2018
Americas	1,469	1,403	1,140	1,515
APAC	968	880	885	961
EMEA	821	807	1,012	1,453
TOTAL	3,258	3,090	3,337	3,929

*Includes full-time employees as of December 31, 2021

Employees by Employment Type and Gender*	2021		2020		2019		2018	
	Full Time	Part Time	Full Time	Part Time	Full Time	Part Time	Full Time	Part Time
Female	592	6	547	5	607	4	749	4
Male	2,615	11	2,532	6	2,674	5	3,137	3

*In 2021, 34 employees declined to state their gender

Our ESG Goals: Diversity and Inclusion	
2022 Target	Our Progress in 2021
Implement hiring initiatives to increase representation of women and underrepresented minorities	We focused our recruitment on increasing gender diversity for our internship roles, as well as increasing recruitment from historically Black colleges and universities in the U.S
Launch a workforce empowerment program through internship opportunities	We launched a global pilot of our mentorship program through our Women In Infinera (WIN) employee resource group. We plan to extend this program to the wider Infinera network

Diversity, Equity, and Inclusion

We recognize that the wide range of backgrounds, lived experiences, and varied perspectives of our employees contribute positively to the fabric of Infinera. We value diversity in all its forms and are proud that our employees represent different races, ethnicities, genders, religious beliefs, sexual identities, and national origins. Our diversity, equity, and inclusion (DE&I) strategy enables engagement and education to provide employees with a non-discriminatory work environment that promotes open and honest communication and embraces dignity, respect, and teamwork in all aspects of our operations.

We understand there is always more progress to be made to ensure equity and inclusion in our operations, but we value the opportunity to learn and co-create a just community alongside our employees. In 2021, we built on the impact of Infinera ALL-In, launched in 2020, a company-wide approach to diversity, inclusion, and belonging. This employee-led, executive-supported effort

employs rotating leadership opportunities while engaging company-wide continuity for local programs. The initiative guided the development of two mandatory training sessions discussing bias and workplace diversity for all employees. The ALL-In team meets monthly and fosters transparency through multiple communication channels including all-hands meetings, intranet articles, and internal social media posts.

We also established a local structure for sites to establish regional or site-specific DE&I networks, led by a local leader, to advance engagement on a personal level. Each group meets monthly to brainstorm activities and discuss region-specific, priority topics. A Local Lead Sync is held each month, which includes the site or regional DE&I leads, employee resource group board members, and the global DE&I team to share best practices. We have started to expand this model from the U.S. to have a global presence that meets the geographic diversity of our sites.

In 2021, local leaders achieved many accomplishments at our sites around the world.

In 2021, our team in Lisbon kicked off the local DE&I program, accompanied by an employee awareness campaign that introduced the DE&I team members, charter, and events. Our Lisbon site hosted a Girls in Information and Communication Technology Day which provided engagement and presentations to 9th and 10th grade classes from local Lisbon schools. The team also developed a manager workshop, as an effort to promote gender and neurodiversity for the 2022 hiring program.

Formed in 2021, the Bangalore team celebrated Global Diversity Month by engaging employees in fun quizzes, Toastmasters clubs, and a cultural photography contest. The team also worked to provide resources for employees to be more engaged and practice mindfulness.

Hiring and Recruitment

In 2019, we formed a Gender Advisory Board (GAB) to lead, manage, and support our efforts to promote gender diversity and equity within the company. Led by our Chief Human Resources

Officer, our Chief Financial Officer, and other key global leaders, the GAB works to refine hiring and promoting practices and foster a culture of inclusion globally. The GAB is actively working on improving reporting and talent acquisition of underrepresented minorities throughout Infinera.

At Infinera, we are also committed to advancing gender diversity for our candidate pools, especially with regard to internship, co-op, and new-graduate roles. In 2021, over one-quarter of the interns who worked for Infinera identified as female, and we aim to increase this percentage moving forward. In the U.S., we are also increasing our audience of candidates, by expanding job postings to historically Black colleges and universities. We aim to expand our internship program and continue to increase the diversity of our candidate pool next year. Our global approach to hiring improvements is represented across many of our sites. In Canada, we are committed to ensuring our research and development roles have a wide range of racial, national origin, and gender representation. In EMEA, we have consortium agreements with the EU to support industry experience for early-stage researchers of diverse backgrounds.

Education and Training

In 2021, we updated our DE&I educational resources to ensure they were inclusive and informative for our employees. Employees with diverse backgrounds supported our review of over 10 training modules and narrowed them down to seven modules that are most beneficial for all Infinera employees. To support our hiring and promotion goals, we included training to assist our managers with overcoming unconscious bias in the hiring process and encouraging open-mindedness in the workplace. After launching these trainings in the latter part of 2021, we've achieved a 78% participation rate among our

global full-time employees. Going forward, we plan to require one training per quarter to encourage the continuous development of inclusivity knowledge. We also plan to further engage external speakers and community partnerships going forward.

Discrimination and Harassment

To achieve a safe working environment and continue the growth of diverse representation throughout Infinera, we are deeply committed to fostering a discrimination-free workplace. This is exemplified by employment decisions based on the principles of human dignity and mutual

Race and Ethnicity as Percent of Population				
	2021	2020	2019	2018
Asian	10.4%	12%	11%	40%
Caucasian/White	19.4%	21%	19%	53%
Black/African American	1.1%	1%	1%	2%
Hispanic or Latino	1%	1%	1%	2%
Native Hawaiian or other Pacific Islander	1%	1%	1%	1%
Other	2%	N/A	N/A	N/A
Declined to answer*	66.2%	65%	67%	N/A

**In 2019, we began providing employees an opportunity to opt out of sharing their ethnic data, resulting in a shift in our data*

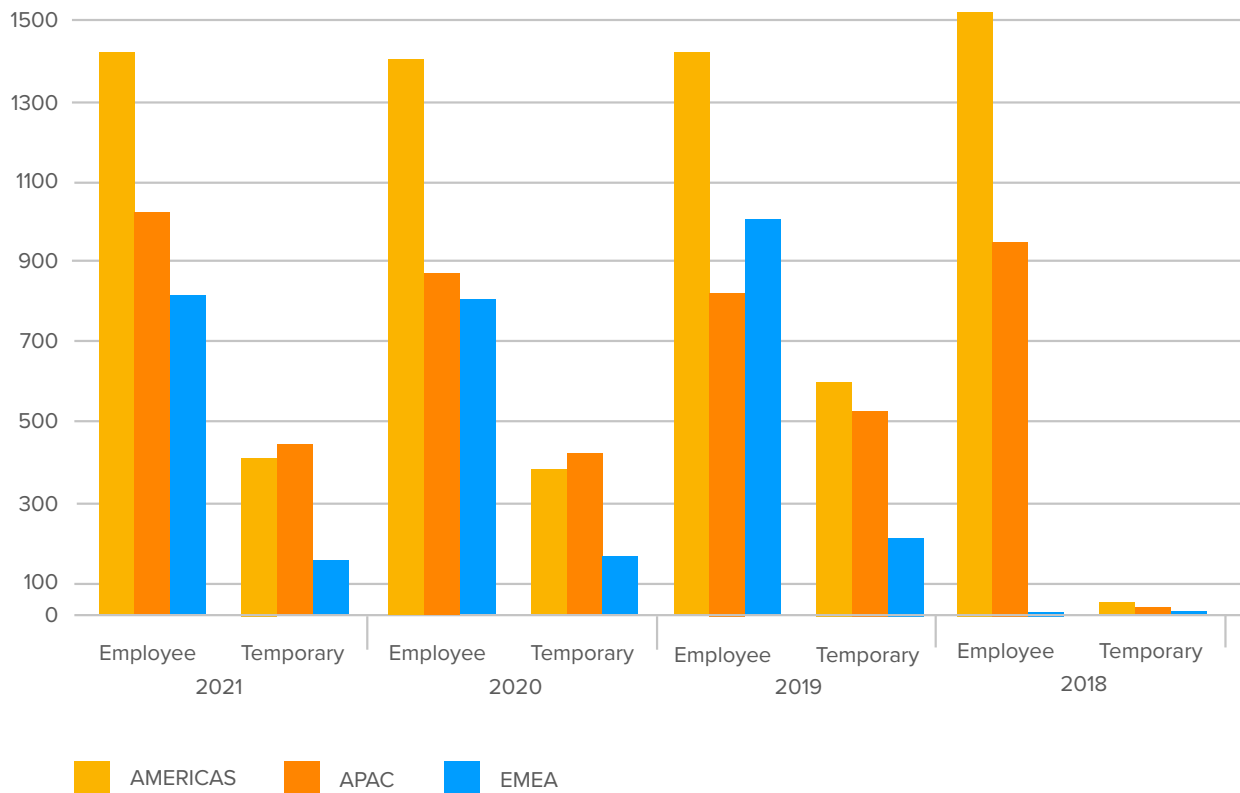
respect while remaining consistent with local laws. Harassment can come in many forms, including physical actions, verbal or written remarks, or visual depictions. We strictly prohibit any acts of harassment and require regular training to ensure managers are aware of what constitutes harassment.

Employee Diversity by the Numbers

We believe that by understanding each other's unique experiences and backgrounds, we can create inclusive working environments that respect and uplift our cultural and ethnic differences. The vast array of social and professional perspectives of our employees around the globe uplift all employees' sense of belonging.

All employee data provided in this report has been compiled from our internal Human Resources records. Major shifts in data trends are attributed to the integration of data from our Coriant acquisition in 2018 and are not reflective of our hiring trends. Since 2019, employees have been given the option to disclose their race, approximately two-thirds of whom declined to do so in 2021.

Employees by Contract Type by Region



Employee Resource Groups

We are proud to provide our employees the opportunity to engage with their colleagues in meaningful ways that encourage the celebration of diversity, dedication to equity, and the fostering of inclusion.

Women at Infinera (WIN)

Women In Infinera (WIN) was founded in 2018 to empower and reinforce women in technology and to facilitate engagement and collaboration with women across the company. Each month, the WIN steering committee meets to share ideas and plan activities. Each quarter, WIN hosts a speaker series seminar to bring both internal and

external speakers together to empower women and enrich their professional careers. The group also provides our female-identifying employees with access to social events, conferences, and other prominent engagements in the technology industry, as well as creates more opportunities for career growth, STEM internships, and leadership.

In 2021, WIN launched a successful mentoring program in the U.S. and expanded to sites across the globe including India, Portugal, Latin America, the U.K., Sweden, and China. A total of 20 employees have been involved in the mentoring program to date. With its excellent feedback from employees, we plan to expand the mentoring program to additional employee resource groups and the wider Infinera employee community.

Black at Infinera

In 2021, the Black at Infinera employee resource group was established to facilitate networking and engagement for employees of African descent and allies. In its founding year, the group focused monthly steering committee meetings on growing membership and discussing the purpose and activities the group will focus on. The ERG is committed to promoting conversations and programs that educate and address race, diversity, and equality.

Black at Infinera is committed to helping members and allies achieve their full potential across a range of professional development and employment opportunities while fostering an inclusive Infinera experience where each member can grow. In the coming year, Black at Infinera will host internal and external activities that help reduce race-based bias and attract, retain, empower, and inspire employees of African descent at Infinera.

All Together LATAM

We are proud that in 2021, employees from our sites in Brazil, Mexico, and Argentina formed an ERG focused on supporting Latinx employees in the workplace and in their professional lives. All Together LATAM strives to inspire all employees to feel included and identify with our diverse workforce. With the goals of promoting inclusion and awareness and educating employees, this ERG meets bi-weekly to empower employees to overcome bias and abolish discrimination.



Supplier Diversity

Last year, we increased diversity awareness within our organization and continued working to develop opportunities for diverse businesses to broaden our supply base. We strive every year to increase our alliances with qualified diverse suppliers who are certified under classifications that include:

- Small Business Enterprise (SBE)
- Women Business Enterprise (WBE)
- Minority Business Enterprise (MBE)
- Small Disadvantaged Businesses (SDB)
- Historically Underutilized Business Zone (HUBZone)
- Veteran Business Enterprise (VBE)
- Service-Disabled Veteran (SDV)
- Disabled Small Business Owners (People with Disabilities)
- LGBT Business Enterprise (LGBTBE)

In 2021, we continued our spending with both small and diverse businesses in the procurement of goods and services and look forward to deepening these partnerships in the years to come.

As a key part of our commitment to emboldening a local and diverse supply chain, we also help mentor and grow the small businesses we work with, and actively contribute to the economic growth of the communities in which we operate. To maintain a thriving and diverse supplier base,

we actively engage with organizations at outreach events. Organizations and events include:

- **Western Region Minority Supplier Development Council (WRMSDC)** — WRMSDC supports the growth and welfare of minority communities by championing the use of minority-owned businesses in Northern California, Nevada, and Hawaii.
- **National Minority Supplier Development Council (NMSDC)** — NMSDC advances business opportunities for certified minority business enterprises and connects them to corporate members.
- **Tech: SCALE** — A nonprofit organization with a mission to help diverse suppliers become strategic supply chain partners to corporations in the technology industry.

Human Rights and Responsible Labor Practices

Infinera is committed to supporting internationally recognized human rights and to upholding the principles reflected in the United Nations' Universal Declaration of Human Rights in our business operations and our supply chain. Our business practices are governed by our internal policies, standards, and protocols, and our suppliers are also required to adhere to our standards of conduct, as listed below:

- [Code of Business Conduct and Ethics](#)
- [Supplier Code of Conduct](#)
- [Partner Code of Conduct](#)
- [Anti-Human Trafficking Statement](#)

We strive to eliminate all forms of forced, bonded, or compulsory labor and expect our suppliers to take measures to mitigate their risk of these types of labor. We do not recruit underaged or minor employees, and we support the elimination of exploitative child labor. Additionally, we support the right of our employees to join unions, bargain collectively, and freely associate. In 2021, our total percentage of global employees covered by a collective bargaining agreement or a works council was approximately 16.9%. This primarily includes employees at our major work locations



in Portugal, Sweden, Brazil, and Finland. At our global facilities where workers are not unionized, we have robust mechanisms in place to ensure that workers can make their voices heard in operational decision-making and grievances can be reported by employees anonymously and with care.

At our manufacturing plants, when significant changes to our operations are made, we provide adequate notice to employees in advance of those changes, as well as appropriate levels of transparency based on organizational change and labor standards per region and by country. Notice periods and provisions for consultation and negotiation are specified in our employees' collective bargaining agreements.

Conflict Minerals

We consider the impact our products have on the world and take responsibility for the well-being of those who bring our products to life. This includes us ensuring that the raw materials that power Infinera products are sourced ethically and responsibly. Our conflict minerals program is designed to monitor the sourcing of tin, tantalum, tungsten, and gold, as well as other minerals of concern, such as cobalt from the Democratic Republic of the Congo (DRC) and adjoining countries, which are at risk of being mined and sold under the control of armed groups to finance conflict characterized by extreme levels of violence.

Conflict mineral policy

We expect that our suppliers have a conflict minerals policy in place to reasonably ensure that the minerals in the products they supply or manufacture do not finance or benefit armed groups in the DRC or adjoining countries. Our [conflict minerals policy](#), available on our website, requires our suppliers to engage with their supply chain to determine the source and chain of custody of minerals, establish their own sourcing policies, and cooperate with Infinera's due diligence activities.

Supplier engagement

We recognize that industry-wide collaboration is critical to the success of global due diligence programs. To that end, we engage closely with our suppliers on our conflict minerals program by communicating our requirements, sharing best practices, and engaging in external industry forums. Each year, our suppliers report on their conflict minerals programs and due diligence results using the [Responsible Mineral Initiative's Conflict Minerals Reporting Template \(CMRT\)](#). Following the internationally recommended due

diligence framework provided by the Organization for Economic Co-operation and Development (OECD), we engage with and follow up with suppliers that provide feedback to improve the quality of our data and our reporting. Each year, we continue to work toward our ultimate goal of a 100% response rate, with 0% invalid or incomplete data.

Annual reporting and disclosure

Each year, in accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act, Infinera files a [report](#) on our conflict minerals program with the U.S. Securities and Exchange Commission. In the spirit of continuous improvement and human rights due diligence, we began planning to increase our data collection and supplier engagement to address the growing risk of cobalt. We plan to begin collecting this data from our suppliers in the 2023 calendar year.

We encourage all individuals throughout our supply chain to use our [ethics hotline](#) to anonymously report concerns and violations of our conflict minerals policy, which are covered under our whistleblower protection and non-retaliation provisions.

Our Strategy to Minimize Exposure to These Risks has Three Key Components		
Adherence to a strong conflict minerals policy	Consistent engagement with our suppliers	Robust annual disclosure

Our ESG Goals: Employee Safety and Well-being	
2022 Target	Our Progress in 2020
Achieve zero workplace injuries in 2020-2022	In 2021, we continued to drive awareness and accountability for a zero-injury workplace in our Tier 1 and Tier 2 sites. Our U.S. injury rate was 1.2%, compared to the industry average of 1%
Improve our employee participation rate and response time for EHS training year over year	Last year, we exceeded our goal of a 90% completion rate for EHS training and made improvements to our HR enterprise systems to manage our training, processing, and records

Health and Safety of Our Workers

We continuously strive to cultivate a culture of human connection, individual responsibility, and mutual integrity through our employee health and safety (EHS) strategy. We are committed to providing our workers with a healthy and safe work environment by preventing accidents, improving workplace conditions, expanding our processes, and encouraging a safety-first culture. Our health and safety programs place an emphasis on personal accountability, professional conduct, and regulatory compliance, while our culture fosters a sense of proactivity, caution, and communication.

Our robust safety culture begins with employee awareness, proactive reporting of near-misses, safety recognitions, and continued training and education. Consistently, we work to improve safety procedures through systematic program assessments and internal and third-party compliance audits. EHS working group and committees meet regularly, conduct thorough

Site-specific EHS Working Group and EHS Committee

Each of our Tier 1 and Tier 2 sites has a cross-functional working group focused on identifying EHS issues and collaborating on solutions to achieve our goals. The working group is joined by the site leader and a senior site services individual to form a committee that meets regularly to discuss milestones, performance, strategic decisions, and areas in need of support. This structure allows each site team to develop greater awareness of safety protocols and enhance our culture of accountability and pride of ownership. Based on ongoing success and improvements implemented at existing sites, we plan to extend this structure to our Tier 3 sites in the near future.

site inspections, and conduct equipment risk assessments. We couldn't be prouder of our culture of safety and personal responsibility, and how it encourages and empowers workers to speak up with their concerns.

At select sites, we employ a safety survey for workers to evaluate health and safety conditions, as well as provide suggestions for improvement. We also continue to develop new tools to streamline EHS processes and enable workers to easily report environmental, health, and safety concerns. Workers can quickly and easily open a ticket, which is reviewed by our Global Employee Health and Safety (EHS) team, then dispatched locally for appropriate solutions.

In 2022, we are enhancing our process by implementing a health and safety workflow application that will provide efficiencies in managing compliance and addressing root causes and corrective actions to help prevent workplace injuries and illnesses. We plan to streamline and automate our incident reporting database to be

more effective and efficient. We expect this secure online enterprise tool will help in greater ease of reporting and better real-time access to data.

Keeping Our Workers Safe from COVID-19

Our workers' health and safety are our top priority. At the onset of the pandemic, we immediately implemented decontamination and contact tracing protocols. Throughout the last few years, our company leadership has partnered with a COVID-19-focused Core Response team for each site, which includes company experts in EHS, HR, Site Services, Operations, R&D, and Manufacturing. These teams operate at a local site level and meet regularly to ensure that we not only comply with all local and international guidelines but also establish best practices at every site. Each reported case is tracked, traced, and swiftly communicated to site services and HR leaders.

In 2021, we maintained exceptional measures to ensure the ongoing health, safety, and comfort of our workers and communities. For our essential workers at our on-site facilities, we ensured the distribution and proper use of personal protective equipment (PPE), provided training on social distancing and hand washing best practices, and implemented rapid testing at no cost to them. We also evaluated and improved our facility HVAC systems and increased our sanitization hygiene program in collaboration with our janitorial services and manufacturing equipment operation teams. For our workers who have the option to

work remotely, we required them to stay home, and we will continue to provide remote and hybrid work environments going forward. Last year, we also encouraged extensive quarantine measures through a mandated 14 paid days at home for anyone who has made contact with an infected person, going beyond what is required by local mandates and laws.

We continue to monitor the dynamic nature of the pandemic as science-backed data is shared among industry association groups, health and safety agencies, and local public health departments.

Management Systems

Our robust safety management system at our Tier 1 and Tier 2 facilities helps us identify, manage, and continuously reduce safety risks and increase performance. This includes using:

- Safety policies that outline requirements and Infinera's expectations
- Standard operating procedures that provide detailed instructions for completing tasks
- Annual risk assessment audits and corrective action plans to identify and redress health and safety opportunities
- Regularly tracked data and reports to measure and monitor performance over time
- Quarterly business review of operations

We also conduct regular industrial hygiene monitoring at our Tier 1 and Tier 2 facilities to ensure we are operating under a safe threshold. In 2021, one of our sites required a hearing conservation plan based on the relocation of equipment and changes to the lab arrangement. We continue monitoring workers' noise exposure, completing necessary mitigation actions, and sharing reports with our workers. We align our environmental management systems with industry standards to enable us to enhance our performance. In 2021, we achieved ISO 14001:2015 certification at our Allentown, Pennsylvania and Sunnyvale, California facilities.



Safety Training

At the corporate level, we assign each worker general safety and job-specific safety trainings, based on the potential hazards their role may experience as well as input from the worker, their manager, and EHS management. Mandated training for on-site job functions covers a wide range of safety topics including laser safety, chemical safety, electrical lock-out/tag-out, and hearing conservation, as well as office and industrial ergonomics. We are also working at the site level to ensure training is properly conducted; for example, at our Ottawa facility, we have enhanced our laser safety program and have hired a dedicated Laser Safety Officer to maintain oversight of this operation.

In addition to required trainings, we also offer volunteer emergency response courses and encourage our workers to participate in our Emergency Response Team (ERT). By improving the accessibility of these training opportunities, such as CPR, first aid, and live fire extinguishing, we've created more opportunities for greater participation at different levels of emergency response to empower every employee to make our workplace safer.



Safety Performance

We aim to lower our injury and incident rates year over year and improve our working processes to ensure a safe environment for our workers. We have trained Hazardous Materials Teams at locations where appropriate and designated ERT members can respond to environmental or safety incidents involving hazardous chemicals or wastes and medical emergencies. In 2021, we did not receive any fines for violations of environmental health and safety compliance. The table to the right covers the safety performance at Tier 1 and Tier 2 sites in the United States. At this time, we do not track health and safety data by gender.

Legend
Total IR = Incident Rate = Total # of OSHA Recordable cases x 200,000 / # of hours worked
Lost Time Case Rate = # of LT cases x 200,000 / # of hours worked
DART Rate = Number of (cases) X 200,000 ÷ Number of hours worked by all employees = Total # of DART incidents x 200,000 / # of hours worked
SR = Severity Rate = Total # of LW Day / # of recordable incidents

U.S. Site-level Safety Performance KPIs* for 2021			
Including potential COVID-19 exposure		Not including potential COVID-19 exposure	
Fatalities	1	Fatalities	0
OSHA Injury Rate for each site		OSHA Injury Rate	
SVL	0.9	SVL	0.9
ALT	2.8	ALT	0
SJ	0	SJ	0
AJ	0	AJ	0
RSN	0	RSN	0
OSHA Lost Time Case Rate*		OSHA Lost Time Case Rate*	
SVL	0.5	SVL	0.5
ALT	2.8	ALT	0
SJ	0	SJ	0
AJ	0	AJ	0
RSN	0	RSN	0
Days Away Restricted Transferred (DART) Rate		Days Away Restricted Transferred (DART) Rate	
SVL	0.9	SVL	0.9
ALT	2.3	ALT	0
SJ	0	SJ	0
AJ	0	AJ	0
RSN	0	RSN	0
Severity Rate		Severity Rate	
SVL	11	SVL	11
ALT	11	ALT	0
SJ	0	SJ	0
AJ	0	AJ	0
RSN	0	RSN	0

Our ESG Goals: Employee Engagement and Organizational Health	
2022 Target	Our Progress in 2021
Implement global site leadership program to solidify company culture, communication, and empowerment	We implemented a training program for people managers to foster more effective, empathetic leadership and employee empowerment and development.
Improve employee engagement and accountability	In 2021, we launched a mentorship program through Women In Infinera (WIN) to engage and empower our employees through learning and networking.

Employee Development and Engagement

Our employees are our most valued asset – and we recognize that their training, ongoing growth and development, feedback, and workplace experience are critical to our success. As such, we provide our global employees regular training, encourage meaningful conversations with management, and offer job-based experiential learning opportunities, such as cross-functional transfers, expanded roles, and relocations to different regions.

Training and Learning

Our mission is to provide a safe and secure work environment that is compliant with all laws and regulations. We know that the best way to ensure the success of that mission is to mandate compliance-focused training courses that all employees, contractors, and contingent workers must complete as required by location and/or role at the company. In most cases, these courses are also required by law. Our people managers

and employees work together to ensure the right learning and development opportunities are provided based on specific roles. In 2021, employees completed, on average, the training described below:

All-Employee Training Requirements (Mandatory)

Required basic employee training averages 3.6 hours biannually, plus other job-specific training courses

People Managers (Mandatory)

All Infinera people managers are required to complete training on Accident Investigation (45 minutes) and Harassment Awareness Training (2.5 hours – once every two years)

Job-specific Courses (Operations-specific)

Certain employees may also receive an average of 4.67 hours of additional compliance training annually, plus other training courses required on a different cadence (e.g., training required every three years, etc.) depending on the job being performed

We offer a series of education courses, made available to all employees of Infinera. In this series, topics included “Sustaining Yourself in a Remote, Hybrid, and On-site Environment,” “Managing Teams in a Global Environment,” “Demystifying Machine Learning and Artificial Intelligence,” and more. We also made a leadership series available to employees at a director level or above, ensuring that our people managers are provided the resources they need for effective, empathetic leadership and employee empowerment. Topics covered include “Up-leveling Your Communication Strategy,” “Increasing Visibility in a Virtual Workplace,” “Empathy and Giving Feedback,” “Faster Decision Making,” and more.

Skill Training and Career Development

We give our people managers the skills and training they need to foster effective and nurturing development conversations with their employees. As a way to ensure regular communication and growth, managers are required to have quarterly conversations with their employees that focus on goal-setting, management feedback, and support.

We also encourage our people managers and our employees to conduct semi-annual Coaching Conversations, which are two-way discussions intended to drive outcomes in a fast-paced and transparent environment. In these sessions, employees are encouraged to discuss career aspirations with their managers or a mentor. These Career Conversations are opportunities for employees to explore their career interests, broaden their skills, review their progress, and ensure they are fully supported with the resources needed to succeed. Through our WIN program, we also launched an employee mentorship program that connects mentors and mentees at Infinera to build professional knowledge, apply lessons learned, and network with other professionals. In 2021, we matched 20 employees with mentors to learn and grow in this inaugural program.

We believe that transparency and integrity help foster a culture of professional growth. Because of this, we encourage our employees to share candid feedback about working for our company through our internal company sites and in public forums. This feedback is received and heard by our executives and considered as we work to consistently improve our employee experience

Recognition of Employee Excellence

At Infinera, innovation, hard work, integrity, and dedication are recognized and rewarded. We strive to make our employees feel seen for their contributions and proud of their accomplishments and take the time to acknowledge when an individual or team performs above and beyond

expectations. Our employee recognition program shows our appreciation in a number of ways, including spot bonuses, You Rock (peer-to-peer) awards, anniversary awards, and team awards that spotlight employees who exemplify Infinera values and culture.

Employee Benefits and Compensation

Comprehensive Benefits

At Infinera, we are dedicated to ensuring our employees' needs are met by providing a comprehensive and substantial benefits program. Our aim is to provide market-competitive benefits as part of our total reward package to ensure all employees around the globe and their dependents are able to thrive. Over the last few years, we have continued to increase our investment in our benefits offerings, to ensure an inclusive, comprehensive, and cost-effective experience for our employees.

Benefits for employees, including medical coverage, exist in all our major global operational regions, including the United States, Sweden, Canada, the United Kingdom, India, China, Portugal, Finland, Brazil, and other locations around the world. Our primary coverages pertain to private medical coverage, life insurance, and various forms of accident or disability coverage. Benefits may differ based on location, statutory requirements, and local customary best practices. In the United States, our regular full-time employees and regular part-time employees (who work 24 or more hours per week) are eligible for

all Infinera benefits. Part-time employees working fewer than 24 hours per week will be eligible for such benefits as are legally required.

We take measures to ensure we are offering increasingly competitive benefits while minimizing costs for our employees and our company. Our comprehensive health benefits program includes medical, dental, and vision plans for eligible employees and their dependents, of which we pay the majority. We also provide employees who are new parents (birth or adoptive) paid time off to spend time with their families. Employees are also able to enroll in a flexible spending account for healthcare, dependent care, and commuting costs.

We also offer a competitive 401(k) retirement savings plan to our U.S.-based employees. Employees are eligible to enroll as of their hire date and contribute a percentage of salary up to the maximum limit imposed by the Internal Revenue Service, plus a company match. In 2021, over 90% of our U.S. employees participated in our 401(k) plan.

Fair Compensation

It is our mission to secure the best talent and foster an environment where they can thrive. We're proud to provide our talented employees with a total compensation package that is competitive with the market, enriching for the individual and inclusive of a base salary, bonuses, and equity awards. Compensation is determined on an individual basis and is reflective of employee performance, the potential for advancement, and unique skills that contribute to the ongoing success of the company.

To continue growing our competitive edge in the talent market, we take special focus to ensure each employee receives the appropriate compensation for their region, role, and tenure at the company. We have also invested in human resources software that targets compensation fairness to improve accuracy and parity in employee compensation around the globe.

Employee Wellness Programs

The health, safety, and well-being of our employees are our top priority. Through on- and off-campus wellness programs, we're fostering a culture of wellness and engagement. Over the last few years, we've worked to create a global program that allows employees in each of our operations to enrich their physical and mental health, emotional wellness, work flexibility, and quality of life. For example, we have expanded our Employee Assistance Program, which is now available to employees in Canada, India, and the U.S., and includes benefits such as mental health counseling for help with personal issues, childcare and eldercare referrals, financial coaching, legal consultation, and wellness tools. Programs vary by location and include fitness challenges, health screenings, financial wellness, estate planning, and healthy living programs.

Employee Assistance Programs

In 2021, we were proud to offer 15 different webinars to our U.S. employees to improve knowledge on topics including retirement planning, estate planning, fitness programs, and meditation.

Staying Well in Lisbon

Around the world, our employees have found fun and innovative ways to get active and stay engaged while working in the office, remotely, or in a hybrid setting. In Lisbon, we held two workshops to encourage physical activity and mental health. Hundreds of employees attended learning sessions on "Stress Management" and "Overcoming the Risks of Working from Home," both hosted by a certified psychologist. We also held a flu vaccination campaign on-site, where over 20% of our site's employee population received their flu vaccine.



Our ESG Goals: Giving Back	
2022 Target	Our Progress in 2021
Implement a new community engagement program	Around the world, site leaders are engaging employees to become more involved in their local communities by volunteering time and resources to support Infinera values everywhere.

Community Engagement

At Infinera, we are proud to be involved in many geographies across the globe and strive to make a positive impact by contributing to the communities in which we live and work. We encourage employees to participate in company-sponsored volunteering opportunities through our Infinera Community Fund (ICF), an all-employee volunteer team founded more than a decade ago. ICF’s mission is to support and foster community engagement through events and initiatives in our local communities. We recognize that each region has priorities and needs that our involvement could support and through our local engagement, our employees can connect to the causes that matter most to them.

Our employees in India and throughout the U.S. participate in the AnitaB.org Grace Hopper Celebration (GHC). As a part of our commitment to empowering diversity, in 2021 we began sponsoring female engineers and technologists to participate in the conference. In Canada, employees also participate in Invest Ottawa, a program that fosters economic development through initiatives that increase entrepreneurial momentum, wealth, and jobs.

In the next year, we are exploring opportunities to support a global community engagement approach, while also leveraging existing local commitments and opportunities to give back to the communities in which we operate.

China

Zhangjiang Fun Run

Our sites in China supported a donation activity as part of the Zhangjiang Annual Running to fundraise for underdeveloped areas in China.

United States

California Hunger Relief Drive

Our California employees united to provide over 9,000 meals to families in need prior to the holidays. Over 100 of our employees participated in contributing to this activity.

Engaging Pennsylvania Communities

In 2021, employees at our Allentown, PA site gathered throughout the year to donate and deliver over 75 games and toys to Toys for Tots, nearly 330 lbs. of food to Second Harvest Food Bank of the Lehigh Valley, and over 60 lbs. of dog, cat, and small animal food, treats, and toys to Animal Food Bank of the Lehigh Valley.

South Africa

Technology Education in Johannesburg

Our Johannesburg site took part in an economic development program that aims to transform the lives of many people in rural communities in the Eastern Cape by providing ICT education to students at two universities. With local partners, Infinera South Africa contributed toward the training, provision of research equipment, and resources necessary for the students to learn, collaborate, research, and become the next generation of technology innovators.

India

Recognition for Our Health on Wheels Program

We were honored to be awarded the Indian Corporate Social Responsibility (CSR) Award for Best CSR Project in Healthcare in 2021 for our “Health on Wheels” program. In partnership with the Aahwahan Foundation in Bangalore, we launched a mobile medical van to provide free healthcare for people in rural areas. The hospitals in rural India were overburdened, understaffed, and ill-equipped, so our medical van transported a doctor, driver, and nurse to visit one village per day and provide treatment to patients in inaccessible rural areas. The medical van traveled to various rural locations, where we offered medical care to about 300 people a day.

We are committed to progressing in sustainability with integrity, continuous improvement, and transparency. As a demonstration of this commitment, we have aligned our environmental, social, and governance (ESG) reporting with frameworks from the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-related Financial Disclosures (TCFD). Beginning in 2021, we have also aligned to TCFD through our disclosure to the CDP Climate Change Questionnaire.

- A. Our Locations and Scope of Environmental Data
- B. Membership of Associations
- C. GRI Content Index
- D. SASB Alignment
- E. TCFD Alignment

Appendix A. Our Locations and Scope of Environmental Data

We have a number of Tier 1, 2, and 3 sites around the globe. Our sites are located in the following geographies: Buenos Aires, Argentina; Victoria, Australia; Melbourne, Australia; Rowville, Australia; Antwerp, Belgium; Sao Paulo, Brazil; Kanata, Canada; Ottawa, Canada; Beijing, China; Shanghai, China; Ballerup, Denmark; Cairo, Egypt; Espoo, Finland; Boulogne Billancourt, France; Munich, Germany; Athens, Greece; Hong Kong; Budapest, Hungary; Ahmedabad, India; Guragon, India; Bangalore, India; Gurgaon, India; Jakarta, Indonesia; Dublin, Ireland; Hod HaSharon, Israel; Rome, Italy; Milan, Italy; Tokyo, Japan; Almaty, Kazakhstan; Kuala Lumpur, Malaysia; Subang Jaya, Malaysia; Oslo, Norway; Manila, Philippines; Taguig City, Philippines; Warsaw, Poland; Lisbon, Portugal; Moscow, Russia; Riyadh, Saudi Arabia; Belgrade, Serbia; Singapore; Centurion, South Africa; Seoul, South Korea; Madrid, Spain; Stockholm, Sweden; Taipei, Taiwan; Bangkok, Thailand; Amsterdam, The Netherlands; Istanbul, Turkey; San Jose CA, U.S.; Sunnyvale CA, U.S.; Richardson TX, U.S.; Annapolis Junction MD, U.S.; Allentown PA, U.S.; Dubai, United Arab Emirates; London, United Kingdom; Hanoi, Vietnam.

The site list above may not be accurate at the time of reading this report.

Below are the sites that are in scope for 2021 data collection, and the corresponding data gathered for each. We allocate our GHG emissions as a result of product measures and business travel for the entire company (except Sweden due to the need for local compliance reporting).

Site	EHS Tier	Scope of Data Gathered
Allentown, PA, U.S.	1	Electricity, Water, Waste, Commuting, Gas
Annapolis Junction, MD, U.S.	2	Electricity, Commuting, Waste
Bangalore, India	2	Electricity, Water, Commuting, Waste
Belgrade, Serbia	3	Electricity, Water, Commuting
Buenos Aires, Argentina	3	Electricity
Espoo, Finland	2	Electricity, Water, Commuting, District Heating, Waste, Company Owned Vehicles
Gurgaon, India	3	Electricity, Commuting

Lisbon, Portugal	2	Electricity, Water, Commuting, Waste, Company Owned Vehicles
Milan, Italy	3	Electricity, Water, Commuting
Munich, Germany	2	Electricity, Water, Commuting, District Heating, Waste
Ottawa, Canada	2	Electricity, Commuting
Penang, Malaysia	3	Electricity, Water, Commuting
Richardson, TX, U.S.	2	Electricity, Commuting
Rowville, Australia	3	Electricity, Commuting, Water
San Jose, CA, U.S.	3	Electricity, Water, Gas, Commuting, Waste
Sao Paulo, Brazil	3	Electricity
Shanghai, China	2	Electricity, Commuting, Waste
Stockholm, Sweden	2	Electricity, Water, Commuting, District Heating & Cooling, Travel, Waste, Company Owned Vehicles
Subang Jaya, Malaysia	3	Electricity, Commuting
Sunnyvale, CA, U.S.	1	Electricity, Water, Gas, Commuting, Waste, Company Owned Vehicles
Taguig City, Philippines	3	Electricity, Commuting

Appendix B. Membership of Associations

In 2021, we participated in industry associations, trade groups, and peer-networking organizations, which are listed below:

American Society for Quality (ASQ)

- Visit <http://www.asq.org/>

Bay Area Procurement Council

- Invitation only, no URL available

Broadband Forum

- Visit <https://www.broadband-forum.org/>

CableLABS

- Visit <https://www.cablelabs.com/>

European Photonic Industry Consortium (EPIC)

- Visit <https://epic-assoc.com/>

Innovative Optical and Wireless Network Forum

- Visit <https://iowngf.org/>

Institute of Electrical and Electronics Engineers

- Visit <https://www.ieee.org/>

International Telecommunications Union (ITU)

- Visit <https://www.itu.int/en/>

International Facilities Management Association (IFMA)

- Visit <https://www.ifma.org/>

Internet Engineering Task Force

- Visit <https://www.ietf.org/>

Linux Foundation

- Visit <https://www.linuxfoundation.org/>

MEF

- Visit <https://www.mef.net/>

O-RAN Alliance

- Visit <https://www.o-ran.org/>

OIF Forum

- Visit <https://www.oiforum.com/>

OpenConfig

- Visit <https://www.openconfig.net/>

OpenROADM

- Visit <http://openroadm.org/>

Optica

- Visit <https://www.optica.org/en-us/home/>

Phylmar Regulatory Roundtable (PRR)

- Visit <https://www.phylmar.com/regulatory-roundtable/>

Responsible Minerals Initiative (RMI)

- Visit <https://www.responsiblemineralsinitiative.org/>

SCTE ISBE

- Visit <https://scte.org/>

Semiconductor Industry Association (SIA)

- Visit <https://www.semiconductors.org/>

Silicon Valley Leadership Group (SVLG)

- Visit <https://www.svlg.org/>

Storage Networking Industry Association

- Visit <https://www.snia.org/>

Telecom Infra Project

- Visit <https://telecominfraproject.com/>

Telecommunications Industry Association (TIA)

- Visit <https://www.tiaonline.org/>

Appendix C. GRI Content Index

This report has been prepared in accordance with the GRI Standards: Core option to the best of our ability. This index includes disclosures on our material ESG topics, as defined on page 12 of this report. Unless otherwise noted, the boundary of each topic includes all Infinera entities and sites, and the management approach for each topic is included in the relevant report section.

Disclosure	Description	Report Sections or URL	Page Number
General Disclosures			
102-1	Name of the organization	About This Report and External Alignment	66
102-2	Activities, brands, products, and services, including an explanation of any products or services that are banned in certain markets	Company Profile	4
102-3	Location of headquarters	Our Global Sites	5
102-4	Location of operations	Our Global Sites	5
102-5	Ownership and legal form	About This Report and External Alignment	66

102-6	Markets served	Company Profile	4
102-7	Report the scale of the organization	Infinera at a Glance	4
102-8	Information on employees and other workers	Our Workforce	31
102-9	Supply chain	Corporate Responsibility Throughout the Value Chain	7
		Responsible Sourcing and Supply Chain Management	16
		Supplier Engagement and Due Diligence	16
		Supplier ESG Assessments	16
		Supplier Surveys and On-site Audits	17
		Supply Chain Resilience	17
102-10	Report any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain	Letter from Our CEO	3
102-11	Report how the Precautionary Approach or Principle is addressed by the organization	Compliance and Risk Management	14
		Environmental Management	25
		Energy and Climate	26

102-12	A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes, or which it endorses	<p>About This Report and External Alignment 66</p> <p>Materiality 12</p> <p>Business Ethics and Fair Business Practices 13</p> <p>Compliance and Risk Management 14</p> <p>Supplier Surveys and On-site Audits 17</p> <p>Product Quality and Customer Satisfaction 18</p> <p>Product Safety and Compliance 20</p> <p>Environmental Management 25</p> <p>Water Management 29</p> <p>Diversity, Equity, and Inclusion 34</p> <p>Human Rights and Responsible Labor Practices 38</p> <p>Health and Safety of Our Workers 40</p>	
102-13	List memberships of associations (such as industry associations) and national or international advocacy organizations. This refers primarily to memberships maintained at the organizational level	Appendix B. Membership of Associations	49

102-14	Statement from senior decision-maker	Letter from our CEO	3
102-16	Describe the organization's values, principles, standards, and norms of behavior such as codes of conduct and codes of ethics	Company Profile Sustainability Management, Governance, and Reporting Business Ethics and Fair Business Practices Social Responsibility	4 11 13 32
102-18	Report the governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for decision-making on economic, environmental, and social topics	Sustainability Management, Governance, and Reporting Annual 10K	11 N/A
102-40	Provide a list of stakeholder groups engaged by the organization	Stakeholder Engagement	11
102-41	Report the percentage of employees covered by collective bargaining agreements	Human Rights and Responsible Labor Practices	38
102-42	Report the basis for identification and selection of stakeholders with whom to engage	Stakeholder Engagement	11
102-43	Report the organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process	Stakeholder Engagement Materiality	12
102-44	Report key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. Report the stakeholder groups that raised each of the key topics and concerns	Stakeholder Engagement Materiality Ensuring Customer Satisfaction	11 12 19
102-45	List all entities included in the organization's consolidated financial statements or equivalent documents	Annual 10K	N/A
	Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report	N/A	N/A

102-46	Explain the process for defining the report content and the material boundaries. Explain how the organization has implemented the Reporting Principles for Defining Report Content	Sustainability Management, Governance, and Reporting	11
		Materiality	12
		Our Material Topics	12
102-47	List all the material topics identified in the process for defining report content	Our Material Topics	12
102-48	Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements	Please see restatements to our environmental data in sections Energy and Climate and Water Management	12 26 29
102-49	Report significant changes from previous reporting periods in the list of material topics and material topic boundaries	No significant changes, see Materiality section	12
102-50	Reporting period (such as fiscal or calendar year) for information provided	About This Report and External Alignment	66
102-51	Date of most recent previous report (if any)	About This Report and External Alignment	66
102-52	Reporting cycle (such as annual, biennial)	About This Report and External Alignment	66
102-53	Provide the contact point for questions regarding the report or its contents	About This Report and External Alignment	66
102-54	Report the “in accordance” option the organization has chosen	About This Report and External Alignment	66
102-55	Report the GRI Content Index for the chosen option. Index must include disclosure numbers and page numbers (or direct URLs)	Appendix C: GRI Content Index	50
102-56	Report the organization’s policy and current practice with regard to seeking external assurance for the report	About This Report and External Alignment	66

Topic Specific Disclosures			
Material Topic: GHG Emissions (GRI 305)			
103-1	Topic boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/ Evaluation of management approach	Environmental Sustainability	22
305-1	Direct (Scope 1) GHG Emissions	Energy and Climate	26
305-2	Energy indirect (Scope 2) GHG emissions	Energy and Climate	26
305-3	Other indirect (Scope 3) GHG Emissions	Energy and Climate	26
305-4	GHG emissions intensity	Energy and Climate	26
Material Topic: Energy Management (GRI 302)			
103-1	Topic boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Product Sustainability and Circular Economy	23
		Energy and Climate	26
302-1	Energy consumption within the organization	Energy and Climate	26
302-4	Reduction of energy consumption	Energy and Climate	26
302-5	Reductions in energy requirements of products and services	Energy and Climate	26
		Product Sustainability and Circular Economy	23

Material Topic: Waste and Hazardous Materials Management (GRI 306)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Product Sustainability and Circular Economy	23
		Waste Management and Recycling	30
306-1	Waste generation and significant waste-related impacts	Waste Management and Recycling	30
306-2	Management of significant waste-related impacts	Product Sustainability and Circular Economy	23
		Waste Management and Recycling	30
306-3	Waste generated	Waste Management and Recycling	30
306-4	Waste diverted from disposal	Waste Management and Recycling	30
306-5	Waste directed to disposal	Waste Management and Recycling	30
Material Topic: Environmental compliance (GRI 307; GRI 308)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Product Safety and Compliance	20
		Environmental Management	25
		Responsible Sourcing and Supply Chain Management	16

307-1	Non-compliance with environmental laws and regulations	Environmental Management	25
		Safety Performance	43
308-1	New suppliers that were screened using environmental criteria	Responsible Sourcing and Supply Chain Management	16
Material Topic: Labor Practices and Human Rights (GRI 401; GRI 402; GRI 409; GRI 412)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Product Safety and Compliance	20
		Environmental Management	25
		Responsible Sourcing and Supply Chain Management	16
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employee Benefits and Compensation	45
402-1	Minimum notice periods regarding operational changes	Human Rights and Responsible Labor Practices	38
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Supplier Surveys and On-site Audits	17
		Human Rights and Responsible Labor Practices	38
412-1	Operations that have been subject to human rights reviews or impact assessments	Responsible Sourcing and Supply Chain Management	16
		Human Rights and Responsible Labor Practices	38
Material Topic: Data Security (GRI 418)			
103-1	Topic Boundary	Our Material Topics	12

103-2 and 103-3	Management approach and its components/Evaluation of management approach	Responsible Sourcing and Supply Chain Management	16
		Our Approach to Sustainability	7
		Human Rights and Responsible Labor Practices	38
		Conflict Minerals	39
418-1	Substantiated complaints regarding concerning breaches of customer privacy and losses of customer data	Privacy and Data Protection	15
Material Topic: Product Safety (GRI 416)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Product Quality and Customer Satisfaction	18
		Privacy and Data Protection	15
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Product Safety and Compliance	18
		Product and Safety Compliance	20
Material Topic: Employee Health and Safety (GRI 403)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Health and Safety of Our Workers	40
403-1	Occupational health and safety management system	Health and Safety of Our Workers	40
403-2	Hazard identification, risk assessment, and incident investigation	Health and Safety of Our Workers	40

403-3	Occupational health services	Health and Safety of Our Workers	40
403-4	Worker participation, consultation, and communication on occupational health and safety	Health and Safety of Our Workers	40
403-5	Worker training on occupational health and safety	Health and Safety of Our Workers	40
		Safety Training	42
403-6	Promotion of worker health	Employee Benefits and Compensation	45
403-8	Workers covered by an occupational health and safety management system	Management Systems	41
403-9	Work-related injuries	Safety Performance	43
Material Topic: Employee Engagement and Development (GRI 404)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Employee Development and Engagement	44
404-1	Average hours of training per year per employee	Training and Learning	44
404-2	Programs for upgrading employee skills and transition assistance programs	Employee Development and Engagement	44
		Skill Training and Career Development	44
Material Topic: Diversity and inclusion (GRI 405; GRI 406)			
103-1	Topic Boundary	Our Material Topics	12

103-2 and 103-3	Management approach and its components/Evaluation of management approach	Our Approach to Sustainability	7
		Our Workforce	33
		Diversity, Equity, and Inclusion	34
405-1	Diversity of Governance Bodies and Employees	Employee Diversity by the Numbers	36
Material Topic: Supply chain management (GRI 308; GRI 414)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Our Approach to Sustainability	7
		Responsible Sourcing and Supply Chain Management	16
308-1	New suppliers that were screened using environmental criteria	Responsible Sourcing and Supply Chain Management	16
414-1	New suppliers that were screened using social criteria	Responsible Sourcing and Supply Chain Management	16
Material Topic: Business ethics (GRI 205; GRI 206)			
103-1	Topic Boundary	Our Material Topics	12
103-2 and 103-3	Management approach and its components/Evaluation of management approach	Business Ethics and Fair Business Practices	13
205-2	Communication and training about anti-corruption policies and procedures	Business Ethics and Fair Business Practices	13
		Ethics and Compliance Training	14
Material Topic: Transparency and reporting (GRI 417; GRI 419)			
103-1	Topic Boundary	Our Material Topics	12

103-2 and 103-3	Management approach and its components/Evaluation of management approach	About This Report and External Alignment	66
		Sustainability Management, Governance, and Reporting	11
417-1	Requirements for product and service information and labeling	Product Safety and Compliance	20
417-2	Incidents of non-compliance concerning product and service information and labeling	Compliance and Risk Management	14
417-3	Incidents of non-compliance concerning marketing communications	Compliance and Risk Management	14
419-1	Non-compliance with laws and regulations in the social and economic area	Compliance and Risk Management	14

Appendix D. SASB Alignment

Code	Disclosure	Metric	Our Response
TC-HW-230a.1	Description of approach to identifying and addressing data security risks in products	n/a	Please see the Privacy and Data Protection section of this report for details regarding our approach to identifying and addressing data security risks in products.
TC-HW-330a.1	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	Percentage (%)	Please see the Social Responsibility of this report for our publicly available aggregated workforce data.
TC-HW-410a.1	Percentage of products by revenue that contain IEC 62474 declarable substances	Percentage (%)	100% of our products contain IEC 62474 declarable substances: lead from RoHS exemptions, TBBPA as a brominated flame retardant in PCBs, PVC as a chlorinated flame retardant in some cables (manufactured without the restricted phthalates under RoHS (EU) 2015/863 and REACH SVHCs). All contain lead and TBBPA. Some may also contain PVC.
TC-HW-410a.2	Percentage of eligible products, by revenue, meeting the requirements for EPEAT registration or equivalent	Percentage (%)	0%. Our products are not under any categories for the EPEAT registry.
TC-HW-410a.3	Percentage of eligible products, by revenue, meeting ENERGY STAR criteria	Percentage (%)	0%. Our products are excluded under ENERGY STAR Large Network Equipment version 1.0. We currently use the ATiS-0600015 Energy Efficiency Requirement for Optical Transport Products..
TC-HW-410a.4	Weight of end-of-life products and e-waste recovered, percentage recycled	Metric Tons (t), Percentage (%)	0%. Any electronics that fail in the field are shipped back to the CM in Asia for full diagnostic to determine failure; most are still in use. We also have a take-back policy. As of today, none have been requested for take-back.
TC-HW-430a.1	Percentage of Tier 1 supplier facilities audited in the RBA Validated Audit Process (VAP) or equivalent, by (a) all facilities and (b) high-risk facilities	Percentage (%)	While we do not currently audit our suppliers in conformance with VAP standards, we are evaluating opportunities to achieve alignment with the RBA's risk assessment program in the future.
TC-HW-430a.2	Tier 1 suppliers' (1) non-conformance rate	Rate	While we do not currently audit our suppliers in conformance with VAP standards, we are evaluating opportunities to achieve alignment with the RBA's risk assessment program in the future.

TC-HW-440a.1	Description of the management of risks associated with the use of critical materials	n/a	Please see the Conflict Minerals section of this report for information on risk identification and management processes for responsible minerals sourcing.
TC-HW-230a.1	Number of units produced by product category	Number	We do not currently have this information available for disclosure; we are exploring the potential to disclose this in the future.
TC-HW-330a.1	Area of manufacturing facilities	Square feet (ft.)	Our manufacturing sites totaled 29,731 sq. ft. as of December 2021. Last year, we incorrectly stated our manufacturing square footage. The correct value for 2020 is 58,365.
TC-HW-410a.1	Percentage of production from owned facilities	Percentage (%)	We do not currently have this information available for disclosure; we are exploring the potential to disclose this in the future.

Appendix E. TCFD Alignment

Governance

Our organization's governance around climate-related risks and opportunities

We have a dedicated global ESG working group that meets quarterly to assess risks and opportunities and set goals and targets related to climate change. The decisions made by this team are approved by the SVP of Operations and communicated to the Executive Leadership Team and the Nominating and Governance Committee. As needed, the Board of Directors is made aware of these decisions and our progress.

Our annual ESG report is approved at the highest level by our CEO. In this report, we address the risks and opportunities of climate change, including energy management, greenhouse gas emissions, environmental regulation, and supply chain risk management and security.

Strategy

The impacts of climate-related risks and opportunities on our businesses, strategy, and financial planning

Climate-related risks and opportunities are integrated into our business strategy, practices, and planning. Our enterprise risk management (ERM) framework includes risks related to climate change such as energy, environmental regulation, and supply chain interruption.

Infinera does not currently conduct scenario analysis in line with the Science-Based Targets Initiative (SBTI) but will evaluate the decision to do so as we further assess our customer and investor needs.

Risk Management

Our organization identifies, assesses, and manages climate-related risks

Our ERM process identifies and allows us to manage risks related to climate change. This process is reviewed and revised every two years and is incorporated into our business continuity planning. Climate-related risks are managed within their corresponding departments of the company. Additionally, we have a dedicated CSR team that meets quarterly to assess risks and opportunities and set goals and targets related to the management of climate change risks and opportunities.

One example of a risk we face due to climate change is supply chain interruption due to natural disasters, such as monsoons that affect our suppliers in Thailand. Risks such as this are identified and addressed through our supply chain team's risk management process, which identifies and assesses the magnitude of risks, including those related to energy, environmental regulation, and supply chain interruption. One way that we manage the supply chain risks posed to us by the effects of climate change is by diversifying our geographic concentration. For example, we have over 200 service depots for customer service and distribution activities, which enables us to meet our service-level agreements in the case of supply chain interruption due to climate-related natural disasters.

Metrics and Targets

Metrics and targets used to assess and manage relevant climate-related risks and opportunities

As we focus on improving our environmental performance and increasing our disclosure, we can better respond to and anticipate our customers' needs and requirements. To identify reputational and market risks and opportunities, we conduct regular materiality assessments, in which climate-related issues such as energy, emissions, waste, water, and environmental regulation are included. Our materiality assessment is aligned with both the Sustainability Accounting Standards Board (SASB) and the Global Reporting Initiative (GRI) and includes a process to survey our internal and external stakeholders for their ESG-related priorities.

One example of an opportunity we stand to gain from is an increase in business or market share due to our reputation. To measure the potential impact of this opportunity, we calculate the financial opportunity for our customers and investors that express the importance of climate-related information. Changes in our market share and reputation also pose to us a risk – just as we stand to gain business from our environmental performance, we can lose it due to underperformance. We calculate this using the potential financial loss of business with customers that prioritize strong environmental performance.

As a part of our climate strategy, we set, track, and measure our greenhouse gas and energy-related goals. Please see the [Energy and Climate](#) section of this report for more details on what targets we are tracking and disclosing, including our Scope 1, 2, and 3 GHG emissions and the related risks.

About This Report and External Alignment

This is the sixth annual sustainability report of Infinera Corporation (referred to herein as “we,” “us,” “our,” and “Infinera”) and covers the 2021 calendar year. Unless otherwise noted, the data in this report is inclusive of our global operations. Our [last report](#) was published on August 2, 2021.

This report provides an overview of our sustainability programs and activities based on aspects determined to be “material” through our ESG materiality assessment. In this case, we use the term “material” to describe the ESG topics most important and impactful to our business and our stakeholders. The materiality assessment,

which is conducted every three to five years, is aligned with the Sustainability Accounting Standards Board (SASB) and the Global Reporting Initiative (GRI). Refer to pages 50-63 for our SASB and GRI content indices. As of 2020, we are annual respondents to CDP (formerly the Carbon Disclosure Project), through which we disclose our environmental and climate-related governance, strategy, risks and opportunities, and metrics and targets. As of 2021, we have made our public CDP scores available. We align our disclosures to the Task Force on Climate-related Financial Disclosures (TCFD) through this submission to CDP’s Climate Change Questionnaire.

This report has been prepared in accordance with the GRI Standards: Core option to the best of our ability. It has not been externally assured. To provide feedback or ask questions, please contact sustainability@infinera.com.

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