

California Transparency in Supply Chains Act of 2010

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Infinera Corporation strives to maintain a culture of compliance with applicable laws, rules and regulations, and adhere to the highest standards of ethics and business conduct with respect to human trafficking and slavery in the supply chain. Infinera expects its suppliers to conduct their business in a lawful manner, but also in compliance with the same high standards of integrity and ethics.

In January 2012, the California Transparency in Supply Chains Act of 2010 went into effect, which requires retail and manufacturing companies to disclose their efforts to ensure that their supply chains are free from human trafficking and slavery.

Verification – Infinera surveys its top suppliers and conducts on-site audits of its major CMs and suppliers to assess and evaluate their performance on topics including labor conditions, child labor and human trafficking. Infinera considers these principles in the selection of its CMs and suppliers with the intention to actively monitor their compliance though currently no third party audit or verification system is in place.

Audit – Supplier audits are announced and conducted by Infinera using audit protocols designed to assess supplier performance relative to the Electronics Industry Code of Conduct and the Infinera Supplier Code of Conduct, all of which address issues of human trafficking and slavery. Infinera believes that workers at supplier facilities have the right to freely choose employment, the right to free association, and the right of the workplace to be free of harassment and unlawful discrimination.

Certification – Infinera suppliers must certify compliance with Infinera’s Supplier Code of Conduct, which addresses human rights, forced labor, child labor and other important ethical standards.

Internal Accountability – Infinera requires all employees and management, including those who are directly responsible for supply chain management, to complete training of Infinera’s Code of Business Conduct and Ethics, which includes compliance with all applicable laws. Non-compliance with Infinera’s standards may result in corrective action or termination.

Training – Infinera employees with direct responsibility for supply chain management receive training on all company policies, practices and procedures designed to ensure that Infinera’s supply chain is free of human trafficking and slavery, including general risk mitigation.

Infinera is committed to responsible sourcing, including the elimination of human trafficking and slavery, if any, in its supply chain, and continually evaluates ways to improve its current practices and procedures.