

Conflict Minerals Policy:

Infinera supports the goals of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), which obligates publicly traded companies subject to SEC disclosure obligations to report annually the presence of conflict minerals located in their supply chains.

Infinera has long required suppliers to have a policy in place to reasonably ensure that the tantalum, tin, tungsten and gold in the products they supply or manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country.

To ensure compliance with the reporting requirements of the Dodd-Frank Act, Infinera has adopted a Supplier Code of Conduct and this policy that requires its suppliers to:

- work with their own suppliers and supply chain to determine the source and chain of custody of conflict minerals within their products, and to submit the results of these inquiries using the Conflict Minerals Reporting Template developed by the Responsible Minerals Initiative;
- establish their own policies, due diligence frameworks and management systems for the traceability of conflict minerals consistent with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, and communicate an expectation to their suppliers that they do the same; and
- cooperate with Infinera in its efforts to comply with any applicable reporting requirements of governmental agencies (including without limitation the SEC Conflict Minerals Disclosure Rule).

Infinera will update this policy as needed.

Conflict Minerals Grievance Mechanism and Reporting:

Infinera will comply with all legal requirements contained in the Dodd-Frank Act. Accordingly, employees, suppliers, and other affected parties are encouraged to report concerns and reported violations of this Policy as follows:

- (1) Write to Infinera Corporation, Legal Department, 140 Caspian Court, Sunnyvale, CA 94089;
- (2) Email Infinera’s Conflict Minerals alias at conflictmineralsINFN@infinera.com; or
- (3) Call Infinera at 408-572-5200.

Reports can be made anonymously, and will be kept confidential to the fullest extent practicable and allowed by law.