

## Ciena Corporation

### Fighting Against Forced Labour and Child Labour in Supply Chains Act

Fiscal 2023

Ciena Corporation (together with its worldwide subsidiaries, “Ciena”) is committed to acting ethically and with integrity in all of its business dealings. This statement is made pursuant to Section 11 of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act and sets out the steps that Ciena has taken and is continuing to take to ensure that modern slavery and human trafficking are not taking place within our supply chain or in any part of our business. In addition to this, Ciena also reports its supply chain activities under the United Kingdom’s Modern Slavery Act 2015.

#### **Structure, activities, and supply chains**

We are a networking systems, services, and software company, providing solutions that enable a wide range of network operators to deploy and manage next-generation networks that deliver services to businesses and consumers. We provide network hardware, software, and services that support the transport, switching, aggregation, service delivery, and management of video, data, and voice traffic on communications networks. Our solutions are used by communications service providers, cable and multiservice operators, Web-scale providers, submarine network operators, governments, enterprises, research and education (R&E) institutions, and other emerging network operators.

Ciena is headquartered in Hanover, Maryland, USA. As of October 31, 2023, we had a global workforce of 8,500 employees, with 2,534 located in Canada. Our legal entity, Ciena Canada ULC, conducts operations in Canada, including from its location in Ottawa.

Our Global Sales and Marketing organization includes a direct sales presence that is organized geographically around the following markets: (i) United States and Canada; (ii) Caribbean and Latin America; (iii) Europe, Middle East and Africa; and (iv) Asia-Pacific, Japan and India. Within each geographic area, we maintain specific teams or personnel that focus on a particular region, country, customer, or market vertical. These teams include sales management, account salespersons and sales engineers, as well as services professionals and commercial management personnel, who ensure that we maintain a high-touch, consultative relationship with our customers.

We also maintain a global channel program that involves resellers, systems integrators, service providers, and other third-party distributors who market and sell our products and services.

Our operations personnel manage our relationships with our third-party manufacturers and global supply chain, addressing component sourcing, manufacturing, product testing and quality, and fulfillment and logistics relating to the distribution and support of our products.

We utilize a sourcing strategy that emphasizes global procurement of materials and product manufacturing in lower cost regions. We rely upon third-party contract manufacturers, with facilities in Canada, Mexico, Thailand, and the United States, to manufacture, support, and ship our products. We also rely upon these contract manufacturers and other third parties to perform design

and prototype development, component procurement, full production, final assembly, testing, and distribution operations. We work closely with our manufacturers and suppliers to manage material, quality, cost and delivery times, and we continually evaluate their services to ensure performance on a reliable and cost-effective basis.

Our business, both for internal use and for use in the products we sell to our customers, utilizes more than 2,000 suppliers globally.

### **Policies and due diligence processes**

Ciena maintains a [Corporate Social Responsibility Policy](#); a [Human Rights Policy](#); and a [Code of Business Conduct and Ethics](#) (“Code of Conduct”) that guide the conduct and behaviour of our employees, officers, and directors.

Ciena’s Corporate Social Responsibility Policy provides that Ciena shall operate its business in an ethical and socially responsible way, within the law and taking responsibility for the impacts of its decisions and activities on the environment, its employees, customers, suppliers, stakeholders, and the communities in which it operates. Ciena is committed to the principles laid out in the [Responsible Business Alliance \(RBA\) Code of Conduct](#).

Our Human Rights Policy complements our Corporate Social Responsibility Policy and is an extension of our Code of Conduct. It reinforces our commitment to fair labour practices, fair compensation, and safe working conditions for our people throughout our global supply chain. We are committed to a workplace environment where our employees are empowered, feel included, and have an opportunity to make a difference through their work.

Under our Code of Conduct, we offer equal employment and advancement opportunities to the most qualified individuals, regardless of race, color, religion, gender, age, national origin, disability, sexual orientation, veteran, or marital status, or any other category protected by applicable law. We do not tolerate any form of discrimination, and we make reasonable accommodations for employees with disabilities.

Employees who violate Ciena’s Code of Conduct are subject to disciplinary action, up to and including termination of employment. Our employees have a duty to report violations of Ciena’s Code of Conduct, and violations can be reported anonymously. Ciena’s internal home page has a prominent link to Ciena’s internal Integrity page, which includes information on Ciena’s integrity policies and on how to report violations. Ciena prohibits retaliation in any form against any employee who, in good faith, reports a possible violation of our Code of Conduct or applicable law.

Ciena has rigorous supplier selection processes and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. Ciena conducts on-site audits of key suppliers, focused mainly on quality and capability, which include a review of operations and production facilities.

Ciena engages EcoVadis to conduct a corporate social responsibility assessment of Ciena’s suppliers. The assessment, initially conducted in 2017 and continuing annually since, included, in aggregate, suppliers representing 70% of our annual spend on components and services used in

the production of our products. Ciena includes consideration of the EcoVadis scorecard assessment results in reviews and discussions with suppliers.

As a member of the RBA, Ciena has access to the audit reports resulting from on-site RBA audits of key suppliers and uses these to further inform its level of risk in the supply chain. Ciena's purchase order terms and conditions, and our [Supplier Guidelines](#), with which all of our suppliers are expected to comply, require our suppliers to adhere to the RBA Code of Conduct and to the provisions of all applicable laws.

To facilitate continued vigilance, Ciena has established an internal, cross-functional team to monitor and assess modern slavery concerns, with members from the Supply Chain Operations, Corporate Social Responsibility, and Legal functions.

### **Forced Labour and child labour risks**

To ensure Ciena is proactive on modern slavery avoidance, we have identified those aspects of our business and supply chain we believe are the most at risk to ensure they receive due attention. Those risk areas include circuit pack and product assembly, and sources of commodity components.

We maintain close relationships with the contract manufacturers responsible for our circuit pack and product assembly. In most cases we have employees physically co-located with the contract manufacturer to monitor and assess their operations and to ensure that Ciena quality standards are met.

Ciena has a procedure to ensure that when contract manufacturers purchase components on Ciena's behalf, the components are sourced directly from the manufacturer or its authorized distributor. Components are purchased from independent resellers only as authorized by Ciena.

### **Remediation measures and loss of income**

Through our supplier assessments, we found no forced or child labour and loss of income within our supply chain, and no measures were needed for remediation. In the event of identified forced or child labour in our supply chain, the actions taken by our teams include engaging with the supplier to drive compliant behavior, temporarily suspending work with supplier while evaluating, developing, and implementing alternative options, or prohibiting further work with the supplier.

### **Training**

We are taking steps to ensure that Ciena personnel are aware of the indicators and risks associated with modern slavery and human trafficking. All Ciena personnel have access through Ciena's learning and training portal to training materials related to modern slavery.

More than 92% of Ciena's supply chain personnel have received training on the prevention of modern slavery and human trafficking within our supply chain.

### **Assessing effectiveness**

To date, we have received no reports from employees, suppliers, the public, or law enforcement agencies to indicate that modern slavery practices have been identified in Ciena's supply chain or in any aspect of its business.

In addition to conducting diligence for any indications of modern slavery within our business or supply chain, we have identified the following performance metrics to gauge the effectiveness of the steps we are taking to ensure that slavery is not taking place:

- Number of personnel who have received training related to modern slavery on a cumulative basis: As of October 31, 2023, more than 90 Ciena employees have received training related to modern slavery.
- Results of assessments of Ciena's supply chain conducted by EcoVadis: Of those suppliers with a previous EcoVadis assessment, 61% improved year over year; 17% did not change; and assessments for 22% declined. 1.2% of our suppliers assessed by EcoVadis did not have a previous EcoVadis assessment. The EcoVadis assessment criteria spans a full spectrum of corporate social responsibility items and is not restricted to modern slavery.
- Percentage of employees completing annual acknowledgment and certification of our Code of Business Conduct and Ethics: In 2023, 99% of Ciena employees completed the Ciena Code of Business Conduct and Ethics certification.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above.

Based on my knowledge and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year listed above.

I have authority to bind Ciena Corporation:



Name: David Rothenstein

Title: Director, Ciena Canada, ULC

Date: 05/28/2024