



## Human Rights Policy

### Message from our CEO

We are a technology leader with a keen understanding that our innovation leadership and success in our markets is ultimately rooted in people. We enable global networks that join us together, and we share a vision of making the world a better-connected place for people in our global communities. We reflect our values — Customer First, Integrity, Velocity, Innovation and Outstanding People — in our approach to winning business and how we interact with those around us. Essential to this is our respect for human rights as a fundamental value. Core to this is our commitment to ensuring fair labor practices, fair compensation and safe working conditions for our people and throughout our global supply chain. We treat forced labor, human trafficking, and child labor with a zero-tolerance approach.

We avoid business with suppliers or business partners who are unable to uphold these values or violate these commitments. We have been a long-standing member of the Responsible Business Alliance (RBA) and work closely with key partners in our supply chain to ensure that they too are upholding the principles set out in the [Responsible Business Association \(RBA\) Code of Conduct](#).

This policy is an extension of the guiding principles and requirements set forth in Ciena's Code of Business Conduct and Ethics. It also reflects our commitment to conducting business in the most ethical way and making Integrity—one of our five core values—a priority in everything we do.

### Respect for Human Rights

We comply with applicable laws and standards governing our business and recognize the importance of adhering to internationally recognized human rights principles in our global operations. We expect our suppliers and business partners to do the same. This Policy is guided by international human rights frameworks, standards, and principles encompassed by the UN [Universal Declaration of Human Rights](#)<sup>1</sup>, including those contained within the [International Bill of Rights](#)<sup>2</sup>, [The UN International Covenant on Civil and Political Rights](#)<sup>3</sup>, the UN [International Covenant on Economic, Social and Cultural Rights](#)<sup>4</sup>, the [International Labor Organizations' eight core conventions](#)<sup>5</sup> and the [International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work](#)<sup>6</sup>. We strive to respect and promote human rights in accordance

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<sup>1</sup> <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<sup>2</sup> <https://www.ohchr.org/sites/default/files/Documents/Publications/Compilation1.1en.pdf>

<sup>3</sup> <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>

<sup>4</sup> <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

<sup>5</sup> <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

<sup>6</sup> <https://www.ilo.org/declaration/lang--en/index.htm>

with the [United Nations \(UN\) Guiding Principles on Business and Human Rights<sup>7</sup>](#) in our relationships with our employees, suppliers and business partners.

More specifically in the U.S., we recognize the principles and objectives set out in key legislation on human rights and the prevention of modern slavery, including: Section 307 of the Tariff Act of 1930 (19 USC § 1307- Convict-Made Goods; Importation Prohibited); Forced Labor (18 USC § 1589); and the Uyghur Forced Labor Prevention Act (HR 6256), all of which seek to prevent any goods made with any level of forced labor inputs, directly or indirectly, from entering US commerce.

This Ciena Human Rights Policy is informed by these international and domestic standards and applies to all officers, directors, employees and contractors of Ciena and its subsidiaries, as well as Ciena suppliers and business partners.

### **What We Expect of our People and Partners**

We are committed to human rights and equal opportunity and require our employees to respect the rights of others. Pursuant to our procurement requirements, policies, and contracts, we expect our business partners to share this commitment to human rights and equal opportunity in the workplace. We seek to work only with suppliers and business partners who maintain high ethical standards and uphold these principles, and we do not tolerate abuse of human rights within our supply chain. We undertake supplier assessments, due diligence and other vetting processes, where appropriate, in selecting and managing the performance of key supply partners in order to reduce the risk of human rights violations in our supply chain. This Policy is overseen and maintained by Ciena's Sustainability Leadership Committee (SLC), a cross functional executive level body, who oversee Ciena's sustainability program and periodically report to the Board of Directors on related matters.

### **Diversity, Inclusion & Belonging**

Through our People Promise, 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. We value an inclusive workplace that appreciates the diversity of our employees, customers, suppliers, and community partners. We are committed to equal opportunity and do not tolerate discrimination, bullying or harassment, including disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. We strive to maintain workplaces that are free from discrimination or harassment on the basis of race, ethnicity, national origin, ancestry, religion, age, genetic information, citizenship, disability, marital status, sexual orientation, sex, gender identification or expression, pregnancy or maternity, veteran or military status or any other status protected by applicable national, state, or local laws.

We comply with applicable labor and employment laws and standards governing our business, including those related to the protection of the rights of women, minority groups or other disadvantaged persons.

We have established Employee Resource Groups (ERGs) to underpin our commitment to diversity, inclusion and belonging, with a global scope.

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<sup>7</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)

## **Freedom of Association and Collective Bargaining**

We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.

## **Safe and Healthy Workplace**

The safety and health of our employees is of paramount importance. Ciena is driven to ensure that no harm comes to our people or those working on our behalf. All of our stakeholders benefit when we provide a secure, safe, and professional environment, free from violence or hostility. Our policy is to comply with applicable safety and health laws, standards and regulations, as well as internal policies, procedures and requirements, intended to promote health and safety. We work to provide and maintain a safe, healthy and productive workplace by addressing and remediating identified risks of accidents, injury and adverse health impacts.

## **Workplace Security**

We are committed to maintaining a workplace that is free from unsafe or disruptive conditions due to internal and external threats, and we act with urgency to address any threats or acts of violence to ensure that our employees are safe. We use corporate assets and resources, and take necessary actions, to ensure security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

## **Forced Labor, Child Labor, and Human Trafficking**

We prohibit the use of all forms of forced labor, including prison labor, child labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking, within our operations and as any input, as labor or products derived from such labor, in our supply chain.

We will not employ individuals under the legal minimum working age in any region in which we operate, and we require the same of our suppliers. We incorporate into our Supplier Guidelines, internal policies, and contracts prohibitions against illegal employment practices and forced labor, and hold those with whom we do business accountable for upholding these laws and ethical standards. We are prepared to engage and assist our suppliers in improving their performance with respect to human rights generally.

Ciena intends to promote, with its employees and suppliers, policies, practices and guidance that reflects the UFLPA and associated CBP guidance.

## **Community Impact and Engagement**

A key part of our People Promise is to enable our employees to make a difference through their work. Ciena actively supports underserved communities through its Digital Inclusion commitment and charitable matching contributions from its Ciena Cares program. Through these and other programs, we recognize that we are part of the communities in which we operate, and seek to engage with these communities, including with community leaders, schools and leading not for profit organizations supporting underserved, under resourced or disadvantaged groups. Where appropriate, we engage with our communities, business partners and stakeholders on these or other human rights issues related to our business.

## **Work Hours, Wages and Benefits**

We compensate employees fairly and competitively relative to the industry and local labor markets in which we operate. We are committed to a fair and living wage, and work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

## **Water and Sanitation**

We believe that human rights includes entitling everyone to safe, acceptable, physically accessible and affordable water for personal and domestic uses.

## **Guidance and Reporting for Employees and Third Parties**

We strive to create workplaces where open and honest communications are valued and respected, and everyone feels comfortable raising concerns without fear of retaliation. We ensure that employees are aware of this Policy and promote the channels and processes to report suspected conduct that is illegal, unethical or in violation of this Policy. We train and promote the ability of our employees to recognize and report human rights violations, including forced labor. Any employee who believes there has been a violation of this Policy or applicable law should raise those concerns with an appropriate resource, such as a supervisor, representative of People & Culture; or a member of the Legal, Compliance or Internal Audit functions.

Employees and third parties can also report suspected policy violations anonymously (where allowed by local law) through our 24-hour reporting service, EthicsPoint. The service is accessible through [www.ethicspoint.com](http://www.ethicspoint.com) or one of EthicsPoint's published toll-free domestic and international telephone numbers. We are committed to investigating and responding to such concerns in a prompt and responsible manner and no reprisal or retaliatory action will be taken against anyone for raising legitimate concerns.

**A. Applicable and Reference Documents**

<b>Document Name</b>	<b>Document Number</b>
Code of Conduct & Business Ethics	<a href="#">CO1-LEG-03</a>

**B. Standard and Reference Elements**

<b>Std. / Req.</b>	<b>Ref No./ Cycle</b>	<b>Description / Title</b>	<b>Relevant Paragraph Within This Document</b>
N/A			

**C. Definitions**

<b>Process Term / Acronym</b>	<b>Definition / Explanation</b>
N/A	