

Viavi Solutions Inc., Viavi Solutions UK Limited and its subsidiaries Aeroflex Ltd.,  
Comtest Wireless International Limited, Comtest Wireless Limited, and Viavi Solutions  
Pension Trustee UK Limited –  
Slavery and Human Trafficking Statement

**November 2024**

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and the California Transparency in Supply Chains Act of 2010 and sets forth the steps the Company has undertaken to ensure that slavery and human trafficking are not taking place in our business or supply chains.

**About VIAVI**

VIAVI Solutions Inc. (VIAVI, also referred to as the Company, we, our, and us) is a global provider of network test, monitoring and assurance solutions for communications service providers (CSPs), hyperscalers, network equipment manufacturers (NEMs), original equipment manufacturers (OEMs), government and avionics. We help customers harness the power of instruments, automation, intelligence and virtualization. VIAVI is also a leader in light management technologies which are used in anti-counterfeiting, 3D sensing, consumer electronics, industrial, automotive, government and aerospace applications.

VIAVI has approximately 3,600 employees working in over 30 countries around the world, including the United Kingdom. We use suppliers and contract manufacturers around the world to supply parts and components for the manufacture and support of our products.

**Our Commitment**

At VIAVI, we realize that being a responsible global citizen is about more than just complying with local regulations. It's about how we do business, and how our organization's activities affect the people and communities where we live and work. From assessing and reducing our environmental impact, to ensuring clean and safe working conditions for our employees and suppliers, VIAVI takes our responsibility to the global community seriously.

**Organizational Policies & Certification**

We comply with the laws regarding slavery and human trafficking in countries in which we do business and require that our suppliers and contract manufacturers do the same. Specifically, the terms and conditions to which all of our suppliers and contract manufacturers are bound require that they "shall comply with all legal regulations, ordinances, decrees, orders, laws, and other rules and regulations, including without limitation all rules, regulations and provisions relevant to health, safety, human rights, labour, ethics, and the environment. "All new suppliers and contract manufacturers are required to provide a certification and all suppliers and contract manufacturers are required to provide VIAVI with written documentation of ongoing compliance upon request. Any indications of slavery or human trafficking would be swiftly investigated. In addition, our Partner Code of Business Conduct prohibits our partners from supporting or using "any forms of forced, compulsory or child labor."

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local regulations. It's about how we do business, and how our organization's activities affect the people and communities where we live and work. From assessing and reducing our environmental impact, to ensuring clean and safe working conditions for our employees and suppliers, VIAVI takes our responsibility to the global community seriously.

VIAVI is an affiliate member of the Responsible Business Alliance and has adopted the RBA's Code of Conduct which prohibits the use of forced labor. VIAVI's internal policies and practices, including the [Global Human and Labor Rights Policy](#) and our Code of Business Conduct implement the Responsible Business Alliance Code.

### **Training**

VIAVI's [Code of Business Conduct](#), which sets forth the standards by which all VIAVI employees are expected to adhere, is available in six languages. VIAVI conducts training for all employees to emphasize the importance of acting in accordance with our Code of Business of Conduct. This training is required of all new employees. Additionally, all employees are required to re-certify their compliance with the Code of Business Conduct biennially and, in alternate biennial years, required to re-take the new hire training. Members of the legal team also incorporate guidance regarding slavery and human trafficking into training sessions for Channel Partners.

### **Audits & Accountability**

VIAVI has a right at any time to audit suppliers for compliance against our terms and conditions but does not generally conduct audits unless we have a reason to suspect a problem exists.

Our whistleblower hotline enables employees and others to confidentially lodge any concerns about the actions of partners, managers, employees or suppliers with respect to human rights violations or other violations of the Code of Business Conduct.

### **Due Diligence & Verification**

As discussed above, our standards, including our prohibition on the use of slavery and human trafficking in our supply chain, are communicated to our prospective suppliers and contract manufacturers as part of our terms and conditions and through our Code of Business Conduct.

As part of our commitment to continuous improvement, we are reviewing methods to perform additional diligence as part of our supplier qualification process to help ensure no VIAVI supplier engages or participates in slavery or human trafficking.

### **Board of Director Approval**

This statement has been approved by VIAVI's Board of Directors, who will review and update it annually.

  
Richard Belluzzo, Chair

November 2024