

## Global Supply Chain

### 1. Purpose

VIAVI is committed to conducting business responsibly and sustainably across its global supply chain. This Sustainable Procurement Policy defines the minimum social, environmental, and ethical standards required of suppliers and aligns with:

- The **Responsible Business Alliance (RBA) Code of Conduct**
- Applicable international labor and environmental standards
- Our certified management systems
- VIAVIs' values of integrity, quality, safety, and continuous improvement

This Policy supports responsible sourcing of electronic components, materials, and services while ensuring compliance, resilience, and long-term value creation.

### 2. Scope

This Policy applies to all suppliers, contractors, distributors, and sub-tier suppliers ("Suppliers") that provide goods or services to VIAVI, including but not limited to:

- Electronic components and assemblies
- Raw materials and chemicals
- Manufacturing services
- Logistics and packaging
- Professional and technical services

Suppliers are expected to cascade these requirements throughout their own supply chains.

### 3. Standards and Frameworks

Suppliers must comply with:

- The **Responsible Business Alliance (RBA) Code of Conduct (latest version)**
- All applicable local, national, and international laws and regulations
- Relevant environmental, labor, health & safety, and anti-corruption laws
- Contractual requirements of VIAVI
- Applicable product compliance regulations (e.g., RoHS, REACH, WEEE, conflict minerals, export controls)

### 4. Supplier Requirements

#### 4.1 Labor and Human Rights

Suppliers shall:

- Prohibit forced, bonded, trafficked, or involuntary labor
- Prohibit child labor and comply with minimum age laws

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- Ensure working hours, wages, and benefits comply with applicable laws
  - Provide a workplace free from harassment, abuse, and discrimination
  - Respect freedom of association and collective bargaining rights where legally permitted
  - Provide humane treatment of all workers

Special emphasis is placed on:

- Contract labor and migrant workers
- Electronics manufacturing and cleanroom environments
- Dormitory and canteen conditions (where applicable)

#### **4.2 Health and Safety**

Suppliers shall provide safe and healthy working environments, including:

- Identification and mitigation of occupational hazards
- Safe handling, storage, and disposal of chemicals and hazardous materials
- Emergency preparedness and response plans
- Machine safeguarding and electrical safety controls
- Appropriate personal protective equipment (PPE)
- Regular health & safety training

Suppliers involved in electronics manufacturing must demonstrate controls for:

- Soldering and flux exposure
- Solvent and chemical usage
- Electrostatic discharge (ESD) safety
- Cleanroom and manufacturing environment controls

#### **4.3 Environmental Responsibility**

Suppliers shall:

- Comply with all environmental laws and permits
- Monitor and reduce environmental impacts related to:
  - Energy consumption
  - Water usage
  - Greenhouse gas emissions
  - Waste generation
  - Air and wastewater discharges

Suppliers must:

- Implement hazardous waste management programs
- Reduce the use of restricted substances
- Support product environmental compliance (RoHS, REACH, halogen-free, etc.)
- Promote recycling and responsible packaging

Suppliers are encouraged to implement environmental management systems aligned with **ISO 14001**.

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#### 4.4 Ethical Business Practices

Suppliers shall conduct business with the highest standards of integrity, including:

- Zero tolerance for bribery, corruption, extortion, or embezzlement
- No improper payments, gifts, or incentives
- Accurate business records and financial transparency
- Protection of intellectual property and confidential information
- Compliance with antitrust and fair competition laws
- Responsible marketing and product claims

#### 4.5 Responsible Sourcing of Materials

Suppliers shall:

- Support responsible sourcing of minerals and raw materials
- Comply with conflict minerals regulations (e.g., 3TG reporting)
- Conduct due diligence on high-risk materials
- Provide material traceability where required
- Avoid sourcing from entities that support human rights abuses

#### 4.6 Information Security and Data Protection

Given the electronics and aerospace/telecom industries served by VIAVI, suppliers shall:

- Protect sensitive technical data, customer data, and intellectual property
- Implement cybersecurity and access controls
- Comply with applicable data protection laws
- Support secure data exchange and confidentiality agreements

#### 4.7 Quality and Product Safety

Suppliers shall maintain management systems that support:

- Product safety and regulatory compliance
- Risk-based thinking and preventive controls
- Change management and configuration control
- Traceability of materials and components
- Corrective and preventive action processes
- Continuous improvement

Suppliers providing critical components must maintain quality systems aligned with:

- **ISO 9001**
- **TL9000 and/or AS9100** where applicable

#### 4.8 Management Systems

Suppliers shall implement management systems that include:

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- Policies addressing labor, ethics, environment, and safety
  - Risk assessment and mitigation processes
  - Training and awareness programs
  - Performance monitoring and metrics
  - Internal audits and corrective actions
  - Documented procedures and recordkeeping

These systems should be compatible with VIAVIs' certified management systems.

## **5. Supplier Due Diligence and Assessment**

VIAVI may evaluate supplier compliance through:

- Supplier self-assessment questionnaires (SAQs)
- RBA-based audits or third-party assessments
- On-site or remote audits
- Review of certifications and compliance documentation
- Performance scorecards

Suppliers must cooperate fully and provide requested information in a timely manner.

## **6. Corrective Actions and Continuous Improvement**

Where non-conformances are identified, suppliers shall:

- Develop and implement corrective action plans
- Address root causes
- Provide evidence of remediation
- Prevent recurrence

VIAVI will work collaboratively with suppliers to drive improvement but reserves the right to suspend or terminate relationships for serious or repeated violations.

## **7. Grievance Mechanisms and Reporting**

Suppliers shall:

- Provide confidential and accessible grievance mechanisms for workers
- Prohibit retaliation for reporting concerns
- Investigate and resolve complaints promptly
- Allow reporting of violations of this Policy

## **8. Compliance and Accountability**

Failure to comply with this Policy may result in:

- Increased audits or monitoring
- Required remediation plans
- Suspension of new business
- Termination of supplier relationship

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This Policy forms part of contractual supplier requirements.

## 9. Governance and Review

This Policy is reviewed periodically to ensure alignment with:

- RBA updates
- Regulatory changes
- Industry best practices
- Management systems certification requirements

Suppliers will be notified of material updates.

## 10. Policy Compliance

VIAVI is committed to ethical business and procurement practices. Reports may also be made through the VIAVI Integrity Helpline at 800-679-7417 or, for the EU countries, 866-455-1215 or the VIAVI Integrity Helpline Website, or our [Navex Global Ethics and Compliance Website](#), all of which allow anonymous reporting as permitted by applicable law.

VIAVI will not tolerate retaliation for reporting a concern in good faith or for cooperating with an investigation, even when no evidence is found to substantiate the report.