

# Global Human and Labor Rights Policy



*“At VIAVI, an unwavering commitment to ethical business practices, dignity of labor and recognition of fundamental human rights is at the core of our business.”*



*Oleg Khaykin*

**Oleg Khaykin**  
**President and Chief Executive Officer**

**Contents**

**1 Purpose .....4**

**2 Inclusion, Opportunity and Non-Discrimination .....4**

**3 Child Labor, Forced Labor and Other Labor Rights .....5**

**4 Freedom of Association .....5**

**5 Responsible Sourcing of Minerals .....5**

**6 Data Privacy .....5**

**7 Due Diligence .....6**

**8 Training.....6**

**9 Policy Compliance .....6**

**10 Governance.....6**

**11 References and Links .....7**

**Appendix A .....8**

## 1 Purpose

This Global Human and Labor Rights Policy aligns with VIAVI's core values and commitment to protect and advance human dignity and human rights in our global business practices.

VIAVI strives to promote and maintain an inclusive work environment free of unlawful discrimination, retaliation and harassment in any form and offering equal opportunities to everyone.

VIAVI is committed to respecting human rights, acknowledges and supports the fundamental principles contained in the Universal Declaration of Human Rights, the tenets of the United Nations Guiding Principles on Business and Human Rights, core International Labor Organization Conventions and the laws of countries in which we operate. We are committed to fair employment practices, and strive to comply with all national, state, and local laws,

When faced with conflicts between such laws and our human rights commitments, we seek to honor the principles of internationally recognized human rights to the greatest extent possible.

We express our commitment to human rights through this Policy as well as our Code of Business Conduct, Channel Partner Code of Conduct, Data Privacy & Data Security Statement, Privacy Policy, Slavery & Human Trafficking Statement, Conflict Minerals Policy, Inclusion and Opportunity Statement, and Pay Equity Statement. Please refer to our [Environment, Social and Governance website](#) to view further details.

VIAVI is an Affiliate Member of the Responsible Business Alliance (RBA) – a nonprofit alliance of leading companies dedicated to respecting the rights and promoting well-being of employee and communities engaged in the global electronics supply chain. We recognize and have adopted the Responsible Business Alliance's Code of Conduct (RBA Code of Conduct). The RBA Code of Conduct is also incorporated into our Terms and Conditions of Purchase for Suppliers.

This Policy is founded on meaningful engagement with rightsholders and other stakeholders, including through engagement in industry efforts to implement the RBA Code of Conduct.

This Policy applies to all employees, management and executives, suppliers, business partners, and strives to respect the human rights of all VIAVI stakeholders. There are no exceptions to this Policy, and no one is exempt from it.

## 2 Inclusion, Opportunity and Non-Discrimination

VIAVI is committed to providing an inclusive, productive work environment that is free from unlawful discrimination or harassment. VIAVI is devoted to creating this type of environment as we believe it brings out full potential within each of us, which in turn contributes directly to our success. This commitment is reflected in our employment practices and decisions regarding recruiting, developing and retaining a highly qualified, and dedicated work force, the promotion of equal employment opportunities, and by compliance

with the letter and spirit of fair employment practices, working conditions, working hours and non-discrimination laws. Our commitment to inclusion and belonging is further detailed in our Code of Business Conduct and our Inclusion and Opportunity Statement. Our commitment to pay equity is further detailed in our Pay Equity Statement. We acknowledge the RBA Code of Conduct's provision on Non-Discrimination/Non-Harassment.

### **3 Child Labor, Forced Labor and Other Labor Rights**

VIAVI is committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. We adhere to the labor standards set forth in the RBA Code of Conduct with respect to Freely Chosen Labor, Young Workers, Working Hours, Wages and Benefits, and Humane Treatment and the commitments set forth in our Slavery and Human Trafficking Statement.

### **4 Freedom of Association**

In conformance with local law, VIAVI shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

### **5 Responsible Sourcing of Minerals**

VIAVI and its subsidiaries are committed to sourcing components and materials from companies that share our values regarding respect for human rights, integrity, and environmental responsibility. Our commitment to responsible sourcing is further detailed in our Conflict Minerals Policy. As an affiliate of the RBA, VIAVI also conducts periodic risk assessments of our supply chain using available RBA tools.

### **6 Data Privacy**

In a world where valuable data is increasingly proliferated and can so easily be misused, VIAVI places importance on protection of personal and customer data and takes its responsibility seriously to securely handle this data.

VIAVI is committed to complying with all local legal requirements relating to the handling of data in all territories in which we operate. In addition, we strive to adhere to our contractual commitments and ensure protection of all data entrusted to us by our customers. Our Data Privacy & Data Security Statement and Privacy Policy further reflect our commitment to respect data privacy.

## 7 Due Diligence

VIAVI may conduct investigations and audits from time to time to verify that business is being conducted in compliance with this Global Human and Labor Rights Policy. All VIAVI employees, management and executives, suppliers, and business partners are expected to cooperate with VIAVI's internal and external auditors and investigators fully and promptly and must respond fully and truthfully to their questions, requests for information, and documents.

## 8 Training

VIAVI provides global mandatory training in accordance with our Code of Business Conduct. Employees and vendors who handle sensitive data also receive training on data privacy awareness, data classification and data security. Additionally, VIAVI offers training globally addressing important human rights topics such as workplace harassment prevention and unconscious bias training.

## 9 Policy Compliance

Report any conduct that you believe to be a violation of this Policy to a member of the VIAVI Legal Department or Human Resources. 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. In addition to the contacts above, concerns may be reported through our toll-free Ethics Hotline, which is managed by our third-party provider, The Network. Toll free numbers for over 25 countries and territories are listed in Annex A. This service is available 24 hours a day, 7 days a week. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law.

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

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

## 10 Governance

This Policy has been approved by VIAVI's Governance Committee and the Board of Directors and will be reviewed by the Board from time to time. Human rights risks are reported to the Board as appropriate.

## 11 References and Links

Document Number	Title
10139520-311	<a href="#">Code of Business Conduct</a>
10139520-076	<a href="#">Channel Partner Code of Conduct</a>
10139523-081	<a href="#">VIAVI Terms and Conditions of Purchase</a>
10139520-323	<a href="#">Slavery and Human Trafficking Statement</a>
N/A	<a href="#">Data Privacy and Data Security Policy</a>
N/A	<a href="#">Privacy Policy</a>
N/A	<a href="#">Conflict Minerals Policy</a>
10139524-218	<a href="#">Inclusion and Opportunity Statement</a>
10139524-219	<a href="#">Pay Equity Statement</a>
N/A	<a href="#">RBA Code of Conduct</a>

## Appendix A

### International Toll-Free Ethics Hotline Numbers

Location	Access Code	Toll-Free Number
USA		800-884-1043 / 770-776-5663
Canada		800-884-1043
United Arab Emirates	8000-021 / 8000-555-66 / 8000-061	800-884-1043
Austria	0800-200-288	800-884-1043
India	000-117	800-884-1043
Russia	8^10-800-110-1011	800-884-1043
Turkey	0811-288-0001	800-884-1043
Denmark		80-887753
Australia		1-800-07-4226
United Kingdom (C&W)		0800-051-7298
France		0800-90-0388
Switzerland		0800-56-3631
Germany		0800-182-6936
Italy		800-788525
Slovakia		800-884-1043
Korea (DACOM)		00-309-11
Malaysia		1-800-81-2718
Singapore		800-110-1547
Taiwan		00801-10-4096
Poland		0-0-800-111-1649
Brazil		0800-891-4258
Mexico		001-800-884-1043
Spain		900-97-1071
Sweden		020-79-9867
China		800-884-1043
Japan		800-884-1043
Hong Kong		800-96-6317