

Modern Slavery Statement Fiscal 2018

to comply with the
California Transparency in Supply
Chains Act of 2010 and
disclosure requirements under
the UK Modern Slavery Act 2015

February 1, 2019

California Transparency in Supply Chains Act 2010

Under the California Act, retailers and manufactures of a certain size doing business in the State of California are obliged to disclose their efforts to eradicate slavery and human trafficking from their direct product supply chains for the goods that they offer for sale.

UK Modern Slavery Act 2015

Under the UK Act, companies providing goods and services with a turnover of £36m or more are obliged to publish an annual Slavery and Human Trafficking Statement setting out the steps the company has taken to ensure slavery and human trafficking is not taking place in its supply chain or its own business.

About Infinera Corporation

Founded in December 2000, Infinera Corporation provides Intelligent Transport Networks, enabling carriers, cloud operators, governments and enterprises to scale network bandwidth, accelerate service innovation and automate optical network operations. Infinera's end-to-end packet-optical portfolio is designed for long-haul, subsea, data center interconnect and metro applications..

Infinera's Disclosure

Infinera strives to maintain a culture of compliance with applicable laws, rules and regulations, and adhere to the highest standards of ethics and business conduct with respect to human trafficking and slavery in the supply chain. Infinera expects its suppliers to conduct their business in a lawful manner, but also in compliance with the same high standards of integrity and ethics. Infinera's relationship with its contract manufacturers (CMs) and suppliers is governed by Infinera's Supplier Code of Conduct.

Verification – Infinera surveys its top suppliers and conducts on-site audits of its major CMs and suppliers to assess and evaluate their performance on topics including labor conditions, child labor and human trafficking. Infinera considers these principles in the selection of its CMs and suppliers with the intention to actively monitor their compliance though currently no third party audit or verification system is in place.

Audit – Supplier audits are announced and conducted by Infinera using audit protocols designed to assess supplier performance relative to the Responsible Business Alliance and the Infinera Supplier Code of Conduct, all of which address issues of human trafficking and slavery. Infinera believes that workers at supplier facilities have the right to freely choose employment, the right to free association, and the right of the workplace to be free of harassment and unlawful discrimination.

Certification – Infinera suppliers must certify compliance with Infinera's Supplier Code of Conduct, which addresses human rights, forced labor, child labor and other important ethical standards.

Internal Accountability – Infinera requires all employees and management, including those who are directly responsible for supply chain management, to complete training of Infinera’s Code of Business Conduct and Ethics, which includes compliance with all applicable laws. Non-compliance with Infinera’s standards may result in corrective action or termination. There is also whistleblowing procedure, which allows an employee to raise a concern without fear of retaliation, as well as an Anti-Bribery Policy.

Training – Infinera employees with direct responsibility for supply chain management receive training on all company policies, practices and procedures designed to ensure that Infinera’s supply chain is free of human trafficking and slavery, including general risk mitigation. Infinera’s training programs are reviewed and updated as necessary.

Infinera is committed to responsible sourcing, including the elimination of human trafficking and slavery, if any, in its supply chain, and continually evaluates ways to improve its current practices and procedures. If we learn of any allegations of human trafficking or slavery through our whistleblowing system, our supplier audits or any other means, we will act promptly and effectively in the best interests of the workers affected, which could mean the termination of the business relationship with the CM, supplier or contractor concerned.

This statement constitutes Infinera’s slavery and human trafficking statement for the financial year ended December 29, 2018.

Infinera Limited (UK)