

At ADVA Optical Networking (“ADVA”), we are committed to running our business responsibly. We strive to live up to our ethical standards embodied in our values and documented in our [Group Code of Conduct](#) (“Code”). Our efforts are supported by periodic trainings for all employees and a dedicated team with clearly allocated responsibilities within the areas of compliance, sustainability and corporate social responsibility. In addition, we actively encourage all individuals to report any (perceived) deficiency either to our Ombudsman or via our [Ethics and Compliance Helpline](#).

Our standards include certain policies and practices to address slavery and human trafficking issues. This aligns with the United Kingdom Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010 (SB 657) and other laws and regulations that require certain businesses to be transparent about their efforts they have undertaken to eradicate slavery and human trafficking in their supply chain.

ADVA is taking multiple actions to ensure that slavery and human trafficking is not occurring in our supply chain, including the following:

- **Our Code and Supplier Code of Conduct**

Our Code derives from our values and sets forth the ethical standards that every employee, manager, director and officer of ADVA needs to comply with. We strive to work with business partners that operate under similar principles. In addition to our Code, our [Supplier Code of Conduct](#) addresses specific issues for our strategic suppliers and is modelled after the EICC’s framework. We do not tolerate any form of forced or compulsory labor.

- **Risk Assessment**

Risk profiling helps us effectively assess our focus within all different types of business partners, including strategic suppliers. Our analysis in particular depends on the type of product or service, or the business partner’s location.

- **Screening, Qualification and Contracting**

ADVA implements screening, qualification and contracting processes for strategic suppliers and other selected business partners. Our measures include questionnaires, technical and operational support and contracting according to pre-defined master purchasing agreements that require and warrant compliance with our ethical values and applicable laws and regulations.

- **Auditing and Monitoring**

ADVA utilizes [online assessment and auditing tools](#) to evaluate strategic suppliers. In addition, clear and specific key performance indicators help us to continuously evaluate our strategic supplier’s performance and to drive improvements where required. Furthermore, on-site audits are conducted where needed.

ADVA’s focus on eradicating slavery and human trafficking is part of a larger effort of supply chain transparency and accountability.

Ethical conduct does not simply happen. It is the product of a corporate culture based on integrity and accountability, modelled by the top and demonstrated by example. Constant re-enforcements and improvements are required. This statement describes the key measures for preventing slavery and human trafficking in our supply chains as applicable for the period Jan 1st to Dec 31st, 2016. It has been approved by the management board of ADVA Optical Networking SE.



Brian Protiva
Chief Executive Officer