

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 training sessions 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, the California Transparency in Supply Chains Act of 2010 (SB 657) and other laws and regulations that require businesses to be transparent about the efforts they have undertaken to eradicate slavery and human trafficking within their supply chain.

ADVA takes multiple actions to ensure that slavery and human trafficking does not occur within 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 (collectively “Employees”) needs to comply with. All Employees receive periodic training and need to acknowledge their adherence in writing. Our commitment extends to our business partners and we strive to work with companies that operate under similar principles. In addition to our Code, our [Supplier Code of Conduct](#) addresses specific issues for our strategic suppliers and is modeled on 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 with regard to all different types of business partners, including strategic suppliers. Our analysis in particular depends on the type of product, 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 compliance with our ethical values, applicable laws or 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 suppliers’ performance and to drive improvements where required. Furthermore, on-site audits are conducted where needed.

Ethical conduct does not simply happen. It is the product of a corporate culture based on integrity and accountability which is modelled by the top management and demonstrated by example. Constant reinforcement and improvement are required. This statement describes the key measures for preventing slavery and human trafficking in our supply chains as applicable for the period Jan 1<sup>st</sup> to Dec 31<sup>st</sup>, 2017. It has been approved by the management board of ADVA Optical Networking SE.



Brian Protiva  
*Chief Executive Officer*

February 2018