

Code of Conduct

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1. CHAIRMAN & CEO MESSAGE

Lightera was created with the commitment to creating brighter connections that shape the future. That is only possible through the solid foundations of our people and the commitment to always conduct business with ethics and integrity.

This Code of Conduct embodies this commitment of our people to operate across every country, culture, and community with the highest standards when facing the everyday challenges.

Moreover, it reflects our unwavering commitment to the Sustainable Development Goals (SDGs) and to a robust ESG (Environmental, Social, and Corporate Governance) performance which are deeply embedded in Lightera's culture.

I encourage every member of our team to read our Code, be inspired by its principles and use as a compass when facing difficult or uncertain situations.

I also invite each of you to lead by example: act ethically, inspire your colleagues and teams, and encourage our partners around the world to live and act by these same values. Together, we can strengthen Lightera's culture of trust and responsibility, everywhere we operate, every day.

Foad Shaikhzadeh

Chairman & CEO



2. CORPORATE VALUES

Furukawa Electric Group Core Values

Furukawa Electric Group has “Core Values”, which we wish to particularly emphasize and enhance even further, to embody the Furukawa Electric Group Purpose.

- **Ownership and Speed:** We take ownership and responsibility to solve issues. We move fast and learn by doing.
- **Collaboration:** We have high respect for diverse backgrounds, cultures, customs and values. We value mutual understanding and maintaining open communication channels between people and organizations. We create collaborative values by cooperation inside the group and open collaboration with core partners.
- **Integrity:** High ethical standards and integrity must be natural for each member of Furukawa Electric Group, contributing to maintain the trust of stakeholders and society. All individuals are representatives of the company, so we all act with fairness, honesty and responsibility. All laws and rules (compliance) are strictly followed.
- **Innovation:** We pursue improvement and transformation for creating new values and achieving sustainable growth of the group. Facing challenges with our team and learning from failure leads to innovation for solving problems of our society.
- **Addressing Reality:** We go and seek to understand the actual situation. We think deeply and logically by repeating “why” to reach a root cause or substance.

The “Core Values” are the values that are important and should be further strengthened in order to achieve continuous innovation.

3. LIGHTERA STANDARD OF CONDUCT

3.1 Commitment to Compliance and Ethics

This Code of Conduct (“Code”) provides the standards of integrity and ethical conduct that Lightera expects all employees to follow. It describes Lightera’s commitment to do business with honesty and transparency, following applicable laws. It does not address every situation or set forth every rule, nor is it a substitute for the responsibility of every employee to exercise good judgment.

Each employee has the responsibility to act with honesty, integrity, and fairness, making conscious and responsible decisions, and ethically managing any real or apparent conflict of interest between personal and professional relationships.



All employees are responsible for complying with this Code and must strive to foster a work environment where safety and sustainability are a priority and where ethical behavior and respect for the individual prevails, being committed to developing a working environment free of intimidation, threatening speech, abusive language and/or reckless behavior.

Where local laws contain requirements that are more stringent than this Code, employees working in those countries are expected to comply with such requirements.

3.2 Sustainability and ESG

At Lightera sustainability is an integral part of our strategy, driving progress for people and the planet.

The company also actively encourages employee participation in social initiatives, volunteer work, and other activities aimed at improving the quality of life for individuals and the community.

Ethics, integrity, and transparency have always been valued principles of Lightera's Corporate Governance, establishing formal education and training for employees about the laws, regulations, policies, and procedures governing our activities.

Environmental responsibility is ingrained in Lightera's way of work. In addition to adhering to relevant environmental legislation, the company is committed to building a more sustainable future by prioritizing the SDGs most aligned with its strategies. This commitment drives initiatives focused on the rational use of natural resources, environmental preservation, recycling, and the reduction of waste generated in production processes.

Thus, the three pillars of ESG – Environmental, Social, and Governance – are part of Lightera's history and culture, turning values and purpose into concrete actions that ensure alignment with the company's strategies and business objectives.

4. ACCURATE BOOKS AND RECORDS

The company's accounting records, whether created by the company or under its responsibility, must be complete, accurate, up-to-date, and truthfully reflect each credit and debit entry. No payment or collection shall occur without proper documentation (e.g., slush funds), nor shall any record fail to accurately reflect the company's legitimate operations, ensuring full compliance with anti-bribery laws and Lightera policies. These records must also be prepared promptly and in accordance with applicable accounting standards.



Lightera is committed to ensuring the integrity of the company's accounting and financial reports as part of best practices in corporate governance. Any attempt to undermine these intentions will be considered a violation of this Code.

Lightera's employees shall always:

- Follow this Code and act with the highest standards of honesty and integrity, including when disclosing information to constituents, auditors, any governmental agency, or the public, ensuring that such information, whether financial or non-financial, is full, fair, accurate, timely, and understandable.
- Be aware that confidential information shall only be shared with individuals who have a specific "need to know" basis for their job duties.
- Act in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated.
- Be responsible for maintaining and implementing accurate and complete records and accounts.
- Comply with all applicable laws, rules, and regulations of federal, state, foreign, and local governments, and other appropriate private and public regulatory agencies.

5. MUTUAL RESPECT IN THE WORKPLACE

5.1 Safe Environment

First and foremost, Lightera is committed to providing a safe work environment. You and your personal safety is of great importance to Lightera. The commitment to safety at work is a duty of all company employees.

We promote the independent work-life management of employees by providing systems that support diverse ways of working, balance the sustainable growth of the Company and the enhancement of individual lifestyles (lives), and create a workplace atmosphere that allows employees to feel pride and job satisfaction.

5.2 Diversity and Inclusion

Lightera is also committed to a work environment based on mutual respect that nurtures each employee as an individual and an important member of the culturally diverse, worldwide Lightera team. Diversity contributes to continuous collaboration, creativity and innovation. The company is committed to building a workforce that celebrates our similarities and embraces differences of cultures, experiences, and thoughts while treating others fairly and with respect.



Thus, Lightera's work environment shall be inclusive, free from discrimination based on race, age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, religion, sexual orientation, socio-economic status, or any other characteristics that make our employees unique.

This means that we comply with applicable human rights and employment equity legislation, and we do not discriminate unlawfully in any aspect of employment, including, but not limited to, recruiting, hiring, compensation, promotion, training, development, or termination. Lightera's talent processes ensure equal opportunities for all qualified individuals.

5.3 Harassment Policy

Harassment occurs when abusive, intimidating, or disrespectful behavior interferes with work, creating a hostile or offensive work environment and harming the dignity and the physical or psychological integrity of an individual or a group. It can occur across different hierarchical levels, as well as among employees at the same level.

Lightera does not tolerate this type of behavior, which includes, among other examples: sexually oriented or racist gestures; ethnic, religious, or homophobic words, actions, comments, or jokes; inappropriate physical contact; gestures or images; as well as the display, written communication, or distribution of related material.

If you believe that you are the victim of or have witnessed discriminatory or harassing conduct, please use the Lightera Whistleblower system where concerns can be reported anonymously. All complaints will be investigated promptly and without reprisal for those who make complaints in good faith.

5.4 Company and Property Resources

Company property and resources are provided for working activities and, for this reason, must be used exclusively for company purposes and must be safeguarded to prevent loss, damage, or misuse.

The use of company property, equipment, business opportunities, and information systems for personal gain or the benefit of third parties, to the detriment of Lightera's interests, is prohibited.

Lightera's computer and network resources are business tools. As such, they must not be used to store, send, or forward threatening or harassing messages or chain letters, to express personal opinions on behalf of the company in online forums, or to access websites or materials containing sexually explicit material or content that could be construed as hostile or offensive or inconsistent with Lightera's values. All use of



company's network and computing resources, including access to the Internet, must comply with Lightera's policies, and with all applicable local, state, and national laws.

All electronic communications systems, including e-mail, computer systems and equipment, as well as telephone systems and voicemail, are the property of Lightera. All communications, messages, e-mails, voicemails, data, and computer files transmitted by, received from, or stored in any of the company's electronic systems are also the property of Lightera. As such, Lightera can and will monitor communication system usage by accessing or auditing employee data and communications at its discretion to ensure that these systems are used properly, legally, and within the business guidelines it has established.

Employees may not remove from the premises Lightera property or property of customers or suppliers, regardless of value, without proper authorization.

Any involvement in theft, whether from Lightera, its employees, suppliers, visitors, or affiliated companies, is a serious violation. This includes stealing property, services, or even computer time, as well as falsifying records or reports for financial gain. Prosecution will be pursued if deemed necessary or appropriate, regardless of the value of the stolen items.

5.5 Social Media

5.5.1 Social Media Communication

All company communications must be conducted solely by authorized individuals or those designated for such purposes. Communications must be clear, truthful, and accurate

Outside communications to the press, as well as granting interviews on behalf of the company, may only occur with prior approval from the Marketing & Communications department or Top Management of Lightera. Also, communication with government agencies or third parties on behalf of the company should be approved by Top Management if outside normal communication as part of the day-to-day functions.

Lightera recognizes the importance of social media as a channel for connection, collaboration, and information sharing. These tools allow us to engage with customers, partners, and communities in meaningful ways.

There is a great deal of responsibility that comes with on-line posting. Lightera may be held responsible for on-line employee behavior, and the sharing of certain confidential, proprietary, customer, or supplier information by employees could negatively impact the business of Lightera.



5.5.2 Social Media Principles

By choosing to use any form of social media or on-line communication tool, you agree to adhere to the following principles:

- Before communicating on behalf of Lightera, be sure to consult with the Marketing & Communications team and/or Risk Management Department in advance to help ensure proprietary information is not inadvertently presented.
- When communicating on behalf of Lightera, always disclose your real name and affiliation as a representative of Lightera. Employees are restricted from posting “personal information” (other than their own) on social media sites such as social security numbers and account information.
- Ensure shared content does not violate Lightera policy or other restrictions, such as copyright laws. Lightera logos or other trademarks should not be used unless permission has been approved by management.
- Unless authorized by management, do not speak on behalf of Lightera.
- Do not post information that could be considered offensive, hostile, illegal or obscene, or that violates foreign, national, state or local laws or Lightera policy.
- Protect Lightera employees, customers, partners and suppliers, as well as the business interests and intellectual property of Lightera, by maintaining the appropriate level of confidentiality. Do not disclose confidential data or information, including but not limited to, financial information, business metrics, or other non-public proprietary company information. Do not share confidential information regarding business partners, vendors, or customers.

For further clarification regarding any information posted or sent externally that affects or references Lightera technologies or intellectual property, contact your manager, the Marketing & Communications team, and/or the Risk Management department before you post. This policy is not intended to restrict communications or actions protected or required by state or national law.

6. RESPECT OF SUPPLIERS, CUSTOMERS AND MARKET IN GENERAL

6.1 Human Rights Policy

In alignment with Lightera’s values and principles, the company is committed to respecting and safeguarding the human rights of all stakeholders.

To this end, Lightera implements proactive measures to promote human rights within its operations and takes all necessary actions to prevent any activities that may negatively impact these rights within the organization.



For this reason, employees agree that to improve the Human Rights of all individuals, we shall:

- Not violate any human rights or tolerate any human rights violations.
- Not use or allow any business partners to use child/forced labor. And refrain from purchasing products or services from suppliers known to engage in child labor, forced labor, or any form of modern-day slavery.
- Not engage in discriminatory treatment or conduct based on factors such as race, age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, religion, sexual orientation, socio-economic status, or any other protected status.
- Respect the personalities, individualities, and values of all individuals, and refrain from acts or behaviors that may damage them.

6.2 Conflict of Interest

A conflict of interest arises when an employee exercises influence or engages in actions intended to obtain personal benefits that conflict with the company's interests or may result in harm or losses to the organization. Conflicts of interest also occur when an employee or an immediate family member receives improper personal benefits due to the employee's position within the company.

Employees and their immediate relatives must avoid any business activity or relationship that could create a conflict between their personal interests and those of the company. Lightera considers itself to be the primary employer for all full-time employees. Although outside employment is permissible, employees are prohibited from any outside employment which might involve a conflict of interest, as providing consulting or technical assistance to Lightera's suppliers, clients, service providers, or competitors, as well as holding any form of corporate participation in these entities.

Additionally, they must not engage in parallel professional activities, secondary employment, or service contracts that conflict with Lightera's working hours or compromise their attention and availability to the company.

The company permits the hiring of employees with family relationships, provided they do not have a direct reporting relationship or engage in activities that create or constitute conflicts of interest. Additionally, they must go through all stages of the selection process without receiving any privileges over other candidates.

Similarly, romantic relationships between employees are allowed if they adhere to the same rules as family relationships and do not interfere with professional activities. Personal matters should remain separate from the workplace, and public displays of affection should not occur on company premises.



6.3 Insider Trading

Insider trading means the buying, selling, or trading of publicly traded securities such as company stock based on non-public information. Such activity is contrary to the law, and Lightera does not tolerate such activity.

If you obtain important, undisclosed information relating to a company or any of its subsidiaries, you may not trade in the securities issued by the listed company or its subsidiaries until the information is made public.

In addition, while you have inside information, you may not share this information with anyone else, including family and friends, or advise anyone about trading any securities based on this information. Also, do not share inside information with anyone else at Lightera unless they must know for Lightera business reasons.

6.4 Relation with Suppliers and Business Partners

Lightera chooses its suppliers based on merit, considering, among other things, price, quality, delivery capability, reputation for service, human rights, and integrity.

Lightera employees must take reasonable measures to assess the qualifications and reputation of suppliers, manufacturer representatives, and other business partners before entering into any business relationship or contractual agreement, ensuring that such business partners understand and comply with the company's principles. Additionally, employees must continuously monitor the activities of the company's business partners to guarantee their adherence to ethical and integrity standards.

Under no circumstances may Lightera employees use suppliers, manufacturer representatives, or other business partners to engage in illicit activities or any actions that violate the requirements of this Code or the law.

6.5 Selling to Customers

Lightera competes vigorously, but fairly. We do not misrepresent our products or capabilities, or those of our competitors, even if it means losing a sale. We communicate clearly and precisely so that our customers understand the terms of our contracts, including schedules, prices, and responsibilities. Our customers can rely on us and on our commitment to them, now and in the future.

To maintain our customers' hard-won trust, our advertisements and other communications must always accurately and fairly describe our products and the products of others. Anything less could be construed as deceptive, which would be a serious disservice to our customers and could damage Lightera's good name.



6.6 Privacy, Data Protection and Confidential Information/ Personal Data Protection

Confidentiality of all company strategic information and other trade secrets must be maintained, including but not limited to commercial proposals, price lists, client information, ongoing projects, financial data, sales plans, costs, employee information, technology and technical information, and non-public third-party information. Only authorized personnel are permitted to disclose such information to external parties for approved purposes, if previously authorized by a Lightera manager or by the Risk Management Department. The employee's obligation to maintain confidentiality of this information shall extend beyond the time of employment by Lightera.

The privacy of personal data must be respected as well and be processed solely when necessary and for legitimate, clear, and predetermined purposes, in full compliance with Personal Data Privacy Legislation as well as Lightera's Data Privacy policy.

Passwords and other access codes to the company's internal systems are individual and non-transferable.

The misuse of company-owned information is prohibited, and it is essential to maintain the confidentiality of Lightera's business and employee information.

In public spaces, heightened caution is required when conducting company business or exposing confidential information in printed or digital formats. The same applies to common areas within the company, such as the cafeteria, meeting rooms, hallways, and other locations where third parties are likely to be present.

Customers and suppliers may only access administrative areas with management approval or when attending events where the customer or supplier has confidentiality agreements in place with the company.

6.7 Gifts, Entertainment, Benefits and Favors

Gifts

A gift may be accepted if it is unsolicited, inexpensive, and not given to influence your judgment. It is preferred that gifts be of an institutional character (e.g., calendars, pens, agendas, etc.). Otherwise, you should decline the gift and explain Lightera's policy to the gift-giver. Lightera considers gifts of a total value of \$25 or less as inexpensive.

If you receive gifts or presents greater than a total value of \$25, you must forward them to the Human Resources Department, which must inform the Risk Management Department and determine its disposition and whether it needs to be returned to the gift-giver.



Never solicit gifts, directly or indirectly, from customers or suppliers. Under no circumstances should you accept, directly or indirectly, payments, loans, kickbacks, special privileges, favors, or services from anyone.

Meals and Entertainment

You may accept occasional meals or other modest forms of entertainment from customers or suppliers as a courtesy extended during the normal course of business decisions. If a customer or supplier proposes entertainment that is more than modest or routine, you must consult your supervisor before accepting the invitation.

Generally, however, you should reciprocate with similar modest hospitality within a reasonable time.

Employees participating in meals with suppliers or clients to discuss work-related matters, at locations outside the company, must inform their manager in advance. The manager must assess whether the presence of another Lightera employee is necessary. In cases involving meals where public officials are present, the rules outlined in this document related to public officials must be strictly followed.

Benefits and Favors

Lightera does not buy business, we obtain it on the merits of our products, service, and people. Never offer – either directly or indirectly - money, favors, inappropriate gifts or promises of gifts, or anything else, to influence, direct, obtain or retain business. It is preferred that gifts be of an institutional character. Otherwise, such benefits or favors may be considered bribery, which violates Lightera's policy, and may violate the laws of the countries in which we do business, which could result in serious fines and penalties for employees and Lightera itself.

Each employee is required to inform his or her supervisor immediately if he or she becomes aware of any such actual, planned, or requested gift or payment. Each employee should also contact the Risk Management Department if he or she has any questions about the legality of any actual, planned, or requested gift or payment.

Receiving or granting any amount of cash is not allowed.

Remember, taking or providing bribes is strictly prohibited and is grounds for immediate termination.



6.8 Donations, Contributions and Sponsorships

Donations will only be permitted if they are transparent, tax-deductible, and fully justifiable in terms of their purpose and destination, in accordance with the company's internal procedures.

Donations to individuals, political parties, candidates for public office, political campaigns, religious institutions, or any organization that may pose a risk of improper use of donated funds or could harm Lightera's reputation are strictly prohibited. Donations made via private accounts are also forbidden.

All sponsorship contributions must be transparent, based on a written agreement, serve a legitimate business purpose, and be commensurate with the compensation offered. Promising, offering, or providing contributions to secure unjustifiable competitive advantages is prohibited. Additionally, no contributions may be made to events organized by individuals or organizations whose objectives conflict with our corporate principles or could damage Lightera's reputation.

6.9 Fair Competition and Antitrust Laws

6.9.1 General Guidelines

Many countries where Lightera does business have laws designed to benefit customers by promoting full and free competition. These laws are intended to make certain that customer choices in the marketplace are not encumbered by improper agreements or other improper conduct that would affect price, restrict volumes produced, or reduce the variety of products or services otherwise available to customers.

Certain agreements are so harmful to customers that they are deemed illegal without regard to their actual effect in the marketplace. These practices are absolutely prohibited and include:

- Agreements or understandings with competitors on price or company's likely future prices.
- Agreements or understandings with competitors to allocate (or "divide up") customers, products, services, or territories.
- Agreements or understandings with competitors to limit the supply or production of any product or service.
- Bid rigging or making agreements or reaching understandings with competitors not to bid in public or private procurements.
- Agreements or understandings with competitors to disadvantage other competitors (such as agreements by two competitors not to deal with another).
- Dictating the price at which independent distributors or resellers may resell Lightera products.



These offenses can be prosecuted as crimes (felonies), resulting in high fines for companies and large fines and significant prison sentences for employees involved. Such activities can also be the basis of civil lawsuits by the government and by private persons and companies, such as customers. It is, therefore, each employee's duty to understand and comply fully with the antitrust laws.

6.9.2 Additional Recommendations

Keep in mind that an unlawful agreement on "price" can cover a broad range of agreements among competitors that directly or indirectly affect the price of goods or services, including, by way of example, agreements on price ranges, minimum or maximum prices, list prices, advertised prices, pricing formulas, discounts and rebates, profit margins, credit terms or other terms of sale.

An unlawful "agreement" or "understanding" need not be in writing. It can be oral or inferred from the parties' conduct.

The obligation to scrupulously avoid even an appearance of impropriety applies to communications with competitors not only in business settings but also in casual social settings. There are no off-the-record discussions with competitors, and meetings must be reported.

Other activities under certain circumstances might also violate antitrust laws, such as agreements with suppliers or customers not to do business with others, certain exclusive dealing arrangements, significant differences in prices offered to customers who compete, charging below cost prices, or selling products or services only on the condition that the buyer purchase a second product or service. Whether such practices create antitrust risk depends on many factors. You should not proceed with any such arrangements without Risk Management Department approval.

Contact the Risk Management Department whenever you have questions about the antitrust laws of the countries in which Lightera conducts business.

6.10 Gathering Competitive Information

Gathering information about competitors, when done legally and ethically, is a legitimate business activity. It enhances our knowledge of the marketplace in which we sell and helps us understand, and compete effectively, to meet customers' needs. Competitive information, however, should never be obtained, directly or indirectly, by improper means such as misappropriating confidential information, bribing or otherwise contacting a competitor's employee, or misrepresenting the fact that you are a Lightera employee. If we retain consultants to gather competitive information on our behalf, the same rules apply.



Benchmarking is a form of competitive information gathering, and as such is subject to the antitrust laws to the same extent as any other Lightera activity. A practice that violates the antitrust laws, such as an agreement on price, is not rendered legal simply by labelling it as benchmarking.

If there are doubts about these or other issues related to business processes, the company's Risk Management Department must be consulted in advance.

6.11 Government Business

Special care must be taken when doing business with governments. Activities that might be appropriate when working with private sector customers may be improper and even illegal when dealing with government employees, or when providing goods and services to another customer who in turn will deliver your product to a government end user.

No gifts, presents, or any form of financial or non-financial advantage may be offered to any government official, or individuals related to them in exchange for personal or business gain to Lightera. Additionally, the use of individuals or business intermediaries to conceal interests or the identity of those benefiting from unlawful acts is strictly prohibited.

Any payment made to government officials must strictly comply with applicable laws and follow the company's approval procedures.

In any meeting or interaction with public officials, at least two (2) Lightera employees must be present.

Furthermore, employees must not interfere in any way with investigations, inspections, or oversight activities conducted by public entities, agencies, or regulatory bodies, nor attempt to obstruct or improperly influence their proceedings.

If you work with government customers, be aware of and honor procurement and other laws that apply. Contact the Risk Management Department if you learn of a violation of these laws or have questions concerning compliance with them.

6.12 Anti-Bribery

Lightera strictly follows the Furukawa Electric Group Anti-bribery statement and consequently our Anti-Corruption and Anti-Bribery Policy. To do so, all Lightera employees and business partners will:

- Not give, offer, promise, accept or demand, directly or indirectly, a bribe from or to anyone.



- Ensure that payments to Government Officials are made according to adequate approval procedures and are reviewed appropriately.
- Be fully aware of and comply with the applicable anti-bribery laws and the Lightera policy through training programs and communication of this policy.
- Engage only with legitimate and transparent Agents and Business Partners, after performing adequate due diligence and trade compliance procedures on the Agent or the Business Partner.
- Regularly assess bribery risks concerning the business of the company.
- Maintain records and financial controls to enable demonstration of compliance with anti-bribery laws and our Anti-Corruption and Anti-Bribery Policy.
- Review and update the policy and controls where necessary to prevent bribery.
- Promptly report any suspected violations of the applicable anti-bribery laws or our Anti-Corruption and Anti-Bribery Policy by any of the Group's Employees, Agents or Business Partners, so that any violations or suspected violations are dealt with timely.

6.13 Intellectual Property

Intellectual property is an intangible and strategic asset for the company. It includes all programs, plans, projects, procedures, processes, products, products under development, improvements, trademarks, copyrights, trade secrets, patents, innovations, know-how, industrial designs, and software developed within the company, as well as any financial, commercial, or market-related activities undertaken by the company or its contractors.

All property rights related to existing intellectual property assets or those created, either directly or indirectly, by Lightera employees in the course of their duties—whether related to research and innovation development—are the exclusive property of Lightera. All Lightera employees are required to disclose to Lightera, any discovery, creation, or invention that the employee has made or has reason to believe might be useful, patentable, or otherwise protectable in the course of their employment. The decision of when, what, and where to pursue possible intellectual property protection will be undertaken by Lightera.

The intellectual property of Lightera, its affiliates, and unrelated third parties must be respected, including copyrights, patents, documents and other intellectual property and information.

No Lightera employee should knowingly use any third-party confidential or patented Information, or trade secret protected for any commercial purpose without the proper licenses or permission to do so in place allowing such use. Only licensed software copies are permitted on company computers.



6.14 Trade Associations

Competitive information can also come to your attention through attendance at trade shows or trade association meetings. While such events can serve useful, legitimate purposes such as providing a showcase for new products, they can also create antitrust risks because they provide a meeting ground for competitors. Whenever you attend such an event, you should avoid even an appearance of engaging in improper discussions with competitors. Under no circumstances should you participate in any discussions with competitors about pricing, price trends, profit margins, bids, terms or conditions of sale, customers, production capacities, marketing or product plans, business strategies, or other such topics. If you find yourself involved in such a discussion, object immediately. If the discussion persists, excuse yourself and report the incident to the Risk Management Department.

6.15 Trade Compliance Rules

Lightera commits to work with transparency in compliance with all rules and regulations. That includes compliance with the laws and regulations on imports and exports in each country and region also observing domestic import and export rules.

To do so, Lightera's employees must comply with applicable laws and regulations in the relevant countries or regions when engaging in international businesses.

7. CODE VIOLATION

Lightera expects employees to report Code violations and other misconduct by employees or other persons of which they become aware either to their manager, the Risk Management department, Human Resources department, or through the Lightera Whistleblower system.

Lightera also expects its employees to cooperate in any investigation of alleged misconduct and not to confront a suspected person or conduct his or her own investigation. Employees should not discuss a case of misconduct, including allegations, suspicions or facts with anyone unless directed to do so by the Lightera Risk Management or Human Resources departments. Lightera does not tolerate any reprisals or retaliation against those who, in good faith, make such reports. Lightera conducts investigations in a fair and impartial manner and maintains the results with due regard for the privacy interests of those involved.



8. WHISTLEBLOWER POLICY

Lightera has established a Whistleblower Policy and a Whistleblower Hotline (Ethics Point) to ensure that a confidential and anonymous process exists whereby persons can express any concerns or complaints about possible violations of law or of this Code, or about the accuracy, fairness or appropriateness of any of the Company's accounting policies or financial reports (accounting irregularities).

You can access EthicsPoint, Lightera's Whistleblowing Hotline, through the website, mobile app, or country-specific phone numbers.

9. ACKNOWLEDGEMENT AND RECEIPT

I confirm that I have read and understood the Lightera Code of Conduct. I agree to follow its rules and ethical principles in all my professional activities. I understand that this document provides standards and does not address every situation.

If I have any doubts or become aware of a violation of the Code or any law, I will report it to the Risk Management Department or through the official reporting channels.

I understand that adherence to the Lightera Code of Conduct is a condition of future or continued employment.

Name _____

Signature _____

Date _____