

1. Objective

The purpose of this Anti-Corruption and Anti-Bribery Policy is to establish clear guidelines to prevent, detect, and address any form of corruption or bribery in Lightera's business activities. This Policy aims to ensure compliance with all applicable laws and regulations, reinforce Lightera's commitment to ethical business conduct, and protect the company, its employees, and its stakeholders from legal, financial, and reputational risks.

2. Scope and Responsibilities

This Policy applies to all Lightera employees and Lightera's agents, representatives, consultants, distributors, resellers, and any other third party acting for or on behalf of Lightera or its affiliates. Because some laws and regulations may differ between locations, each employee is responsible to become familiar with and adhere to local laws and regulations, particularly when they differ from this Policy. When any requirements differ, the strictest requirement shall apply. Regions or locations may adopt additional policies and procedures, as necessary, to accomplish this Policy.

Lightera is committed to the highest standard of integrity in our business practices. This Policy, together with Lightera Code of Conduct and its other compliance programs, sets out minimum ethical standards Lightera employees and third parties acting on behalf of the Company must adhere to. Employees and such third parties are strictly prohibited from engaging in any illegal activities, including but not limited to corruption, bribery, money laundering, fraud, or any conduct that violates applicable laws and regulations. Failure to comply with these standards and policies can damage Lightera's reputation and may subject the Company to civil and criminal penalties. Individuals who violate this Policy expose the company to civil and criminal penalties, and are subject to disciplinary action, including termination. Violations of the laws referred to in this Policy can also lead to fines and imprisonment for individual employees.

Lightera Policy is to comply with all applicable laws and regulations in every location where it operates, as well as with the corresponding laws of all other countries in which it conducts business, ensuring the prevention and prohibition of corruption and bribery. This Policy therefore applies globally to all Lightera employees and third parties acting on behalf of Lightera across all Lightera operations.

We obtain business only on the merits of our products, services and people. Offering or making payments or anything else of value to "buy business," either directly or indirectly, is

strictly prohibited under Lightera’s policy and may also be a criminal offense in many countries. Lightera requires its employees and third parties acting on behalf of the Company to use only legitimate competitive practices in compliance with all applicable laws in conducting all of our business activities. This means that we rely solely on the abilities of our sales personnel and representatives/distributors to communicate effectively the merits of our offerings to customers.

Likewise, Lightera employees and third parties acting on its behalf may not request or accept, directly or indirectly, payments, loans, kickbacks, special privileges, favors, or services from a third party in violation of this policy. If you are ever offered a bribe by anyone, you must report it to the Risk Management Department immediately.

Since Lightera may be held responsible for the corrupt conduct of third parties acting on its behalf, Lightera must engage such third parties only after performing adequate due diligence on their selection, entering into a written contract with them approved by the Risk Management Department, and then monitoring their performance for compliance.

3. Related Documents

Lightera Code of Conduct

Whistleblower Policy

4. Definitions

- Government official: includes any person acting in an official capacity for or on behalf of a government, a government agency or instrumentality, a state-owned enterprise, a public international organization, or a political party, including their officers, employees, candidates, and other individuals exercising official influence regardless of rank or position.
- Anything of value: includes cash or cash equivalents, charitable donations, political contributions, travel expenses, services, sports outings, entertainment, loans provided to non-creditworthy debtors, and gifts. But see the section, below, on permissible gifts and entertainment.
- Knowing: includes any conscious disregard or deliberate ignorance of circumstances that may indicate a payment is an indirect bribe and therefore constitutes a violation of applicable laws, internal policies, or Code of Conduct.
- Third parties: include sales agents, brokers, representatives, consultants, contractors, joint ventures, commission agents, import–export clearing agents,

distributors, value-added resellers, and any other individual or entity that is not a Lightera employee.

5. The Law

Anti-corruption laws strictly prohibit offering, promising, authorizing, or giving “anything of value” — including money, gifts, or other benefits — either directly or indirectly, to any person or entity, whether in the public or private sector, with the purpose or reasonable expectation of improperly influencing a decision, securing an undue advantage, or obtaining or retaining business for Lightera. This prohibition applies to interactions with private individuals, independent third parties, company representatives, government officials, political parties, or candidates.

It is important to understand that anti-corruption laws are often applied extraterritorially. This means they may be enforced against companies and individuals based in a country even if the infraction is committed abroad. In many cases, they also apply to international subsidiaries of companies headquartered in that country.

Failure to comply with anti-corruption laws, including prohibitions against illicit payments or benefits to any person or entity may result in criminal proceedings, fines, imprisonment, or both, for individuals, as well as significant penalties against companies.

6. Policy

No employee or third party may, directly or indirectly, engage in improper practices or conduct, and must comply with the guidelines and instructions related to the following topics.

6.1. Bribery and Payments

It is strictly prohibited to give, offer, promise, authorize, accept or make a payment or provide anything of value (including bribes or kickbacks) to:

- Any individual or firm (private or government) to influence an act, decision, or secure an improper advantage for Lightera; or
- Any individual or firm acting for or on behalf of a government, government agency, state-owned enterprise, or public international organization to influence an act, decision, or secure an improper advantage for Lightera; or
- Any government official, political party, party official, or candidate for political office to influence an act, decision, or secure an improper advantage for Lightera; or

- Any third party, knowing or having reason to know that the payment will be passed on to any of the above individuals for prohibited purposes.

Payments made for the purpose of facilitating governmental operations (commonly called facilitation payments) are illegal in most countries. These are payments made to government officials so that they complete routine, non-discretionary actions that Lightera would already be legally entitled to, e.g., processing permits, issuing visas, or clearing customs. Lightera strictly prohibits such payments, subject to applicable law. You must immediately notify the Risk Management Department about any need or requests to make a facilitation payment.

6.2. Gifts and Entertainment

Reasonable and appropriate business entertainment and gifts of nominal value, preferably institutional in nature and offered simply as a courtesy or as a gesture of goodwill, are generally permissible.

Certain business promotional expenses are permitted, provided they are reasonable, made in good faith for a legitimate purpose, and allowed under the laws of the applicable country and internal policies. The expenses must be directly related to promoting Lightera products, and Lightera must be able to demonstrate that they are reasonable and appropriate. Please contact the Risk Management Department before giving any gifts if you have questions.

- Do not request gifts or entertainment from third parties.
- Do not accept gifts or entertainment that exceed the limits established in the Code of Conduct.
- Modest gifts given as a courtesy or token of goodwill are generally permissible if their value is nominal or reasonable and consistent with the recipient's position. Company logo items and business samples may have slightly higher value.
- Promotional expenses, including meals or hospitality, must be reasonable and appropriate and follow the internal procedures and approvals.
- All entertainment, hospitality, and gifts must be accurately recorded in Lightera's books and records.
- Cash or cash equivalent gifts are never permitted.
- Gifts or promotional items to government officials are generally not recommended. If provided, they must be of reasonable value and preferably of an institutional nature representing Lightera. Contact the Risk Management Department before

offering any gifts, entertainment, meals, travel or lodging expense or anything else of value to any government official.

6.3. Books, Records and Internal Controls

Lightera must maintain accurate and complete records and financial controls to enable Lightera to demonstrate compliance with anti-bribery laws and this policy. Therefore:

- Never make false or misleading entries in Lightera's books and records.
- Do not attempt to bypass financial controls.
- All transactions must be recorded accurately, reflecting the facts and nature of the operation.
- Misidentifying transactions (e.g., paying the wrong payee) or mischaracterizing expenses is prohibited.
- Lightera maintains internal accounting controls to ensure proper documentation and compliance. Intentional misrecording may lead to disciplinary action, including termination.

7. Violations

Any actual or suspected violation of this Policy or of applicable anti-corruption laws must be reported immediately to your manager, the Risk Management department, Human Resources department, or through the Lightera Whistleblower system.

The Risk Management Department is responsible for issuing this Policy. Therefore, any questions regarding its content, including whether a payment, gift, or favor may be considered improper, should be referred to the Risk Management Department.