

Code of Conduct

SUPPLIERS AND
BUSINESS PARTNERS

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1. LIGHTERA STANDARD OF CONDUCT

1.1 Commitment to Compliance and Ethics

This Code of Conduct (“Code”) provides the standards of integrity and ethical conduct that Lightera expects all suppliers and business partners to follow. It describes Lightera’s commitment to do business with honesty and transparency, following applicable laws.

Each supplier and business partner 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 suppliers and business partners are responsible for complying with this Code and must communicate and extend the criteria, guidelines, and requirements described herein to their employees, executives, partners, members, shareholders, and all other related parties, ensuring that all conduct related to the contracts aligns with ethical and moral principles.



1. LIGHTERA STANDARD OF CONDUCT

1.2 Sustainability and Environmental, Social and Governance (ESG)

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

Suppliers and business partners must comply with all applicable environmental legislation and are encouraged to promote the responsible use of natural resources, environmental preservation, recycling practices, and the reduction of waste generated in their processes.

In addition, Lightera encourages its partners to act responsibly toward the communities in which they operate, contributing to positive social impacts in a manner consistent with their business activities, while prioritizing the Sustainable Development Goals (SDGs) most closely aligned with their business strategies.

Moreover, Lightera expects its suppliers and business partners to maintain effective governance frameworks, ensuring ethical leadership, integrity, and transparency in all aspects of their operations. They are also expected to ensure that their employees, executives, partners, members, and shareholders receive adequate guidance and training on the laws, regulations, policies, and procedures applicable to their activities, promoting behaviors consistent with ethical and moral standards in all business relationships.



2. RESPECT OF SUPPLIERS, CUSTOMERS AND MARKET IN GENERAL

2.1 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.

For this reason, suppliers and business partners 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.
- Not tolerate any form of harassment and abusive conduct.

Diversity contributes to continuous collaboration, creativity and innovation. Lightera expects its suppliers and business partners to foster a work environment based on mutual respect, valuing each individual as an important member of a diverse and inclusive team. All suppliers and business partners must comply with applicable human rights and employment equity legislation.

2. RESPECT OF SUPPLIERS, CUSTOMERS AND MARKET IN GENERAL

2.2 Privacy, data protection and confidential information/personal data protection

Suppliers and business partners must maintain strict confidentiality regarding any information belonging to Lightera and/or its clients that is accessed or obtained as a result of the business relationship. Such information may only be disclosed to third parties when expressly authorized in writing by Lightera.

This includes, but is not limited to, commercial proposals, price lists, client data, ongoing projects, financial information, sales plans, costs, employee information, technologies, technical documents, and any non-public information about third parties.

Suppliers and partners are also expected to respect and protect personal data, ensuring it is processed only, when necessary, for legitimate and clearly defined purposes, and in full compliance with applicable personal data protection laws and Lightera's Privacy Policy. The misuse, improper disclosure, or unauthorized access to Lightera's information is strictly prohibited.



2. RESPECT OF SUPPLIERS, CUSTOMERS AND MARKET IN GENERAL

2.3 Gifts, entertainment, benefits and favors

Lightera expects its suppliers and business partners to uphold the highest standards of ethics and integrity when offering or receiving gifts, hospitality, or any other advantage in the context of the commercial relationship. Suppliers and business partners should avoid offering any such item to Lightera's employees, except for gifts provided to Lightera employees or representatives that are unsolicited, modest, and of an institutional nature, such as calendars, pens, or other promotional items.

The total value of any gift, whether individually or combined, must not exceed US\$25. Gifts or benefits in the form of cash or cash equivalents (such as gift cards, vouchers, or prepaid cards) are strictly prohibited. Hospitality, such as meals or modest entertainment, may be offered only when occasional, reasonable, and directly related to legitimate business purposes. Suppliers and business partners must ensure that such hospitality does not create, or appear to create, any undue influence over business decisions.

Suppliers and business partners must never offer, promise, request, or accept any improper advantage, including money, favors, excessive hospitality, or any item intended to influence or secure business. Lightera does not permit bribery or corruption in any form, and any attempt to improperly influence decisions will be considered a serious violation of this Code and applicable anti-corruption laws. All interactions must be transparent, proportional, and aligned with ethical business practices.



2. RESPECT OF SUPPLIERS, CUSTOMERS AND MARKET IN GENERAL

2.4 Fair competition and antitrust laws

Lightera strictly prohibits any actions that compromise fair and free competition. We expect all our suppliers and business partners to fully comply with applicable competition and antitrust laws and to conduct their activities with integrity, transparency, and independence. Any behavior that may distort market conditions, limit consumer choice, or improperly influence prices, supply, or market access is unacceptable and will not be tolerated.

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 a 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 others involved. In this context, 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. An unlawful "agreement" or "understanding" need not be in writing. It can be oral or inferred from the parties' conduct. It is, therefore, all suppliers and business partners duty to fully understand and comply with the antitrust laws.

2. RESPECT OF SUPPLIERS, CUSTOMERS AND MARKET IN GENERAL

2.5 Anti-bribery

Lightera maintains a zero-tolerance approach to bribery and corruption in all its business operations. We expect the same level of commitment from all suppliers, agents, and business partners who act on our behalf or represent our interests.

In alignment with the Furukawa Electric Group Anti-Bribery Statement, Lightera requires that every individual or entity connected to our business adhere to the highest standards of ethical conduct, transparency, and compliance with applicable anti-corruption laws. Any attempt to improperly influence decisions, obtain unfair advantages, or engage in corrupt practices is strictly prohibited.

To comply with these standards, all Lightera suppliers and business partners must:

- Never give, offer, promise, request, or accept any bribe or improper advantage, whether directly or through intermediaries.
- Ensure that any interaction with government officials, on behalf of Lightera or when doing business with Lightera, complies with applicable laws and follows transparent, legitimate, and properly documented procedures.
- Be fully aware of and comply with the applicable anti-bribery laws.

- Operate only through legitimate and transparent business practices and be subject to Lightera's due diligence and trade compliance reviews when applicable.
- Implement measures to identify and manage corruption and bribery risks within their operations.
- Report promptly to Lightera any suspected or actual violation of anti-corruption or anti-bribery laws involving their personnel or associated entities related to business with Lightera.

2. RESPECT OF SUPPLIERS, CUSTOMERS AND MARKET IN GENERAL

2.6 Intellectual Property

Lightera's intellectual property (IP) is a strategic and protected asset. It includes technologies, designs, trademarks, software, confidential information, trade secrets, and any innovation or material developed by the company or on its behalf.

In addition to this Code, suppliers may be subject to specific Non-Disclosure Agreements (NDAs) and/or contractual provisions that further define and detail the rights and obligations related to intellectual property and confidential information. Such agreements complement the principles set out in this Code and must be complied with, as applicable.

All suppliers, contractors, agents, and business partners must:

- Respect Lightera's intellectual property rights and use any proprietary information only for the specific purpose for which it was shared.
- Protect all confidential, technical, commercial, and financial information received from Lightera, and refrain from disclosing or misusing it.
- Ensure that any work, development, or deliverable created for Lightera is transferred with the appropriate rights and remains the exclusive property of Lightera, unless otherwise agreed in writing.
- Respect the intellectual property rights of Lightera, its affiliates, and third parties, only using materials, software, or technologies when properly licensed or authorized.

Unauthorized use, copying, sharing, or exploitation of Lightera's or third-party IP is strictly prohibited.

2.7 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 suppliers and business partners must comply with applicable laws and regulations in the relevant countries or regions when engaging in international businesses, especially when such business activities are engaged on behalf of Lightera or involving any of Lightera's products.

3. GENERAL PROVISIONS

This Suppliers and Business Partners Code of Conduct shall remain in force indefinitely, until a revised version is formally issued. All Lightera suppliers and business partners are required to comply with the guidelines established herein and may not, under any circumstances, claim unawareness of its contents.

Lightera considers it essential to maintain a cordial, respectful and transparent relationship between the parties in all business interactions. Suppliers and business partners who become aware of any violation of the principles established in this Code, or of any applicable laws or regulations, are encouraged to report such concerns through Lightera's EthicsPoint, the company's official reporting channel. All information on how to access EthicsPoint is available on the company's website.

Any breach of this Code may result in the immediate termination of Agreements between Lightera and the supplier or business partner, without prejudice to Lightera's legal or contractual rights.



4. ACKNOWLEDGEMENT AND RECEIPT

By signing below, the undersigned confirms that they are an authorized representative of the company named below and that the company has reviewed, understands, and agrees to comply with the Lightera Suppliers and Business Partners Code of Conduct.

The company further agrees to communicate and apply the principles of this Code to its employees and other parties involved in providing goods or services to Lightera.

_____	_____
Company Name	Authorized Representative
_____	_____
Title	Signature

Date	



Lightera

Creating brighter
connections