1. Objective

The Lightera Code of Conduct requires all employees to observe high standards of professionalism and behavior in conducting business for Lightera. As employees and representatives of Lightera, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. Pursuant to this policy, the Company wishes to ensure that a confidential and anonymous process exists whereby persons can express any concerns or complaints about possible violations of law or the Lightera Code of Conduct, or about the accuracy, fairness, or appropriateness of any of the Company's accounting policies or financial reports (accounting irregularities).

2. Scope and Responsibility

This Whistleblower Policy applies to all Lightera employees and to all third parties who have a business or commercial relationship with the company. All such individuals are responsible for complying with the Lightera Code of Conduct, acting in good faith and based on reasonable belief, and promptly reporting any suspected or actual violations of the Code or other misconduct in accordance with this Policy.

3. Related Documents

Lightera Code of Conduct

4. Definitions

- **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.
- **EthicsPoint:** the reporting system used by Lightera to receive and manage concerns or reports of misconduct. It provides employees, business partners, and other third parties with a secure and confidential channel to raise issues related to violations of the Code of Conduct, company policies, or applicable laws and regulations.

5. Policy

5.1 No Retaliation

No person who in good faith reports a violation of federal or state law or the Lightera Code of Conduct, or an accounting irregularity, shall suffer harassment, discrimination, retaliation, or reprisal for making such report. An employee who retaliates against someone for reporting a violation in good faith is subject to discipline up to and including termination of employment.

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5.2 Acting in Good Faith

Anyone filing a complaint concerning a violation of law or the Lightera Code of Conduct, or accounting irregularities, must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to be unsubstantiated and to have been made recklessly, maliciously, or knowingly to be false will be viewed as a serious disciplinary offense.

5.3 Confidentiality

Reports of violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. The company is committed to maintaining the principles of procedural fairness and for all individuals involved in the reporting process. No attempts will be made to identify whistleblowers who choose to remain anonymous, provided the system is used responsibly and not for malicious or false reporting.

Reports will be kept confidential to the extent possible under the circumstances, consistent with law and the need to conduct an adequate investigation and resolve the matter reported.

5.4 Handling of Reported Violations

All reports of suspected or confirmed violations submitted through the EthicsPoint platform are handled with the highest level of confidentiality and professionalism. Reports are received directly on the secure EthicsPoint server and are accessible only to the Whistleblowing Committee, which is responsible for evaluating and addressing such matters.

Upon receipt of a report, the case is promptly reviewed and assigned to the appropriate function, such as Risk Management, Human Resources or Legal, depending on the nature of the issue and the location of the incident. The investigation process will be conducted fairly, objectively, and in compliance with applicable laws and internal policies.

The EthicsPoint system ensures that implicated parties are never granted access to the reports in which they are named, thereby preventing conflicts of interest or retaliation. If the report is submitted anonymously, a secure “Report Key” and password is provided and allows the reporting individual to log back into the system to check for updates, add further information, or respond to additional questions from the company.

Throughout the entire process, all communications remain fully confidential. When dialogue with the reporting party is necessary, the company maintains it in an anonymous and secure manner. This ensures that every concern can be properly reviewed, addressed, and resolved, regardless of its complexity.

Follow-up actions and conclusions of investigations are documented to ensure accountability and continuous improvement of our compliance program.

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5.5 Reporting Violations

The Lightera Code of Conduct suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly.

Each employee is responsible for communicating any possible violation of the terms of the Lightera Code of Conduct.

In most cases, an employee's immediate supervisor or manager, representative of the Compliance or Human Resources area, are in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor, representative of the Compliance or Human Resources area, or you are not satisfied with the response, you are encouraged to contact the Lightera Whistleblower Hotline, EthicsPoint, through the website, mobile app, or country-specific phone numbers.

The Risk Management Department is responsible for issuing this Policy. Therefore, any questions regarding its content, the reporting process, or the handling of concerns raised under this Whistleblower Policy should be referred to the Risk Management Department.

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