



ACHIEVING
TOGETHER

ciena[®]

Code of
Business
Conduct
and Ethics

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Message from Our CEO



Ciena team,

As enablers of the global networks that join us together, we share a vision of making the world a better-connected place. This takes all of us, working as a team and *Achieving Together*—a phrase that aptly describes both what we do and how we do it. Our commitment to conducting business in the most ethical way and *doing the right thing every time* makes this possible. We achieve together when we make **Integrity**—one of our five core values—a priority in everything we do.

This commitment is critical for maintaining the confidence and support of our colleagues, customers, shareholders, and others with whom we work. It is fundamental to building strong, trusted relationships and fostering our world-class corporate culture, including a diverse, inclusive, and supportive environment where we all feel included.

Our Code of Business Conduct and Ethics (the “Code”) sets forth the standards we expect of our team members, officers, and members of the Board of Directors. We also expect that our suppliers and other business partners adhere to these same high standards to ensure that our full ecosystem reflects our values.

Each of us is responsible for knowing and following the Code. I encourage you to review this important guidance to ensure you understand what is expected of you. Of course, the Code doesn’t cover every situation, so if you are ever unsure, please ask before acting. You are not alone. Achieving together is about teamwork and support. The Code includes resources where you can always seek help. Also, if you have a concern or are aware of a potential violation of the Code, we want to hear from you. Speaking up is instrumental in conducting business the right way.

It is everyone’s responsibility to follow our legal and ethical obligations and hold each other to the highest standards. By acting with integrity in everything we do, we achieve together and ensure our continued success.

A handwritten signature in black ink, appearing to read "Gary B. Smith". The signature is stylized and cursive.

Gary B. Smith
President and Chief Executive Officer



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We achieve together when we live our values every day, follow the Code, and promote a strong and supportive environment for speaking up and making good decisions.

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Living Our Values

Our values are who we are as a company, strengthening our shared work environment and promoting positive experiences for all of us and our stakeholders. We reflect our values in our approach to business and how we interact with those around us. Simply put, our success depends on our values, and we achieve together when we live them every day. Living our values every day means:



Customer First

Our customer and partner relationships are critical to our success. We take a practical, customer-centered approach. As strategic partners, we are proactive in addressing customer needs and always treat our customers as we would want to be treated.



Integrity

We do the right thing—upfront and every time—building trust and fostering long-term relationships with team members, shareholders, customers, and partners. We keep our promises and hold ourselves to the highest personal and professional standards.



Agility

We use our agility to help fuel our growth mindset and move forward with the confidence, resiliency and flexibility to pursue new opportunities and shift our focus when conditions change.



Innovation

We innovate across every function of the business to gain new opportunities and create efficiencies. We are driven to innovate, to excel, to help each customer and partner excel, and to outperform our best day—every day.



Teamwork

We are an inclusive and inspired team and treat each other, our stakeholders, and our communities with respect. We are empowered to combine our passions and creativity and challenge the status quo by embracing our differences and promoting diversity of thought in a safe, open, and collaborative organization.

This Code is an extension of these core values and reflects our strong commitment to Integrity. Along with good business judgment and thoughtful behavior, our Code lights the path to conducting business ethically, making the right decisions, doing the right thing, and living our values.

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Following the Code

Our Code applies to all of us at Ciena: our employees, contractors, officers, and Board of Directors. We also expect our business partners to adhere to the same high standards.

Each of us has a responsibility to follow the Code and our company policies, procedures, and handbooks, many of which address Code topics in greater detail. We must also follow the laws and regulations that apply to us and our work in the countries where we do business.

If at any time you have a question about what's expected under the Code, please ask. And speak up if you notice something of concern. You will find many helpful resources identified throughout the Code, and there are many people to whom you can turn for help, including your manager, the Legal Department, the Compliance team, and the People & Culture team, to name a few.

INTEGRITY TIP | DOING THE RIGHT THING

Business performance expectations and ethical expectations are not only compatible, they're directly related. Our interests are never served by unlawful or unethical business practices. Doing the right thing for the right reason is always good business. If you ever have a question about the Code, please reach out to your manager or another appropriate resource.

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Managers Leading the Way

Our executives and managers hold a special responsibility for promoting **Integrity**. These leaders demonstrate and encourage ethical behavior through both words and action. They work together with their teams to create a culture built on trust and support. It is critical they set a good example and foster a positive work environment where everyone feels comfortable raising concerns without fear of retaliation. We expect these leaders to:

- Read, follow, and reinforce the Code in what they say and do;
- Ensure their teams read, understand, and follow the Code;
- Take proactive steps to mitigate business and compliance risks in their areas of responsibility;
- Promptly and appropriately raise any potential Code violations;
- Foster an environment where every team member feels comfortable speaking up and asking questions; and
- Prevent retaliation in any form against anyone who reports a concern in good faith.

For additional manager resources, visit our [Leading with Integrity Manager Resource](#) page.



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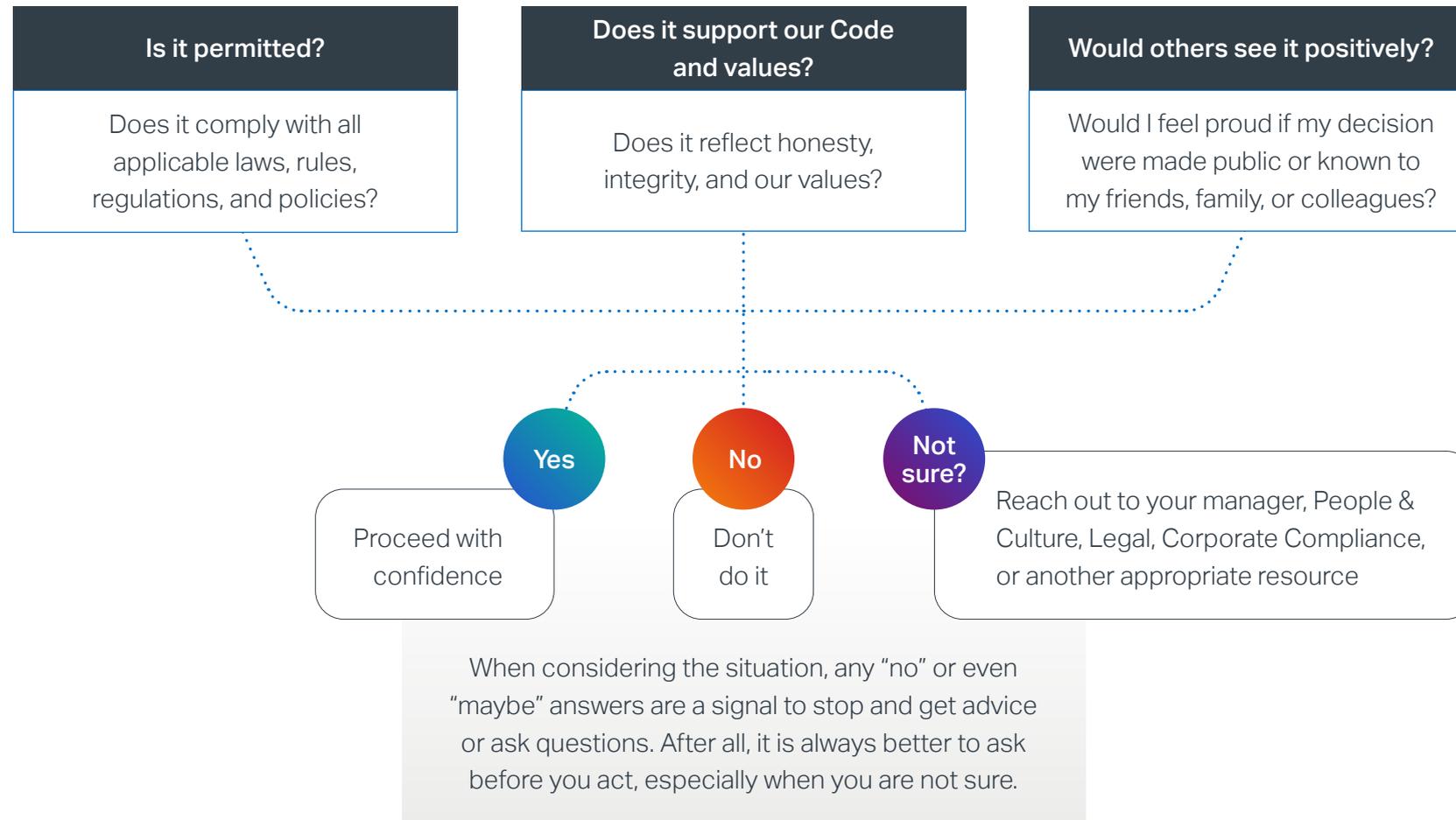
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Making Good Decisions

In most cases, we should be able to rely on this Code and our own experience to help us make ethical choices. But we may come across complicated situations where the solution isn't obvious. At these times, use this guide to help you make good decisions, and ask for help when needed.



Speaking Up with Confidence

We strive for and promote a workplace where everyone feels comfortable raising concerns without fear of retaliation. Each of us has a duty to speak up about violations of the Code. If you know or suspect any unethical conduct that could violate the law, this Code, or Ciena policy, you must promptly report it to an appropriate resource, such as:

- Your supervisor or another manager,
- People & Culture,
- Our General Counsel or an attorney in the Legal Department
- Corporate Compliance, or
- Internal Audit

If you prefer, you can report potential violations anonymously (where allowed by local law) through our 24-hour reporting service, EthicsPoint. You may access the service through:

- www.ethicspoint.com
- One of EthicsPoint's toll-free domestic and international telephone numbers
- Go/Ciena—Compliance page

If your concern addresses a potential violation involving an executive officer or member of the Board of Directors, contact the General Counsel or chairperson of the Audit Committee of Ciena's Board of Directors (auditcommitteechair@ciena.com).

Q Can my manager retaliate against me for reporting a possible violation of the Code?

A *No. Ciena strictly prohibits retaliation against someone who raises a concern in good faith.*

We take reported concerns seriously. That means we investigate them promptly, thoroughly, objectively, and without retaliation. We each have a duty to cooperate fully in any internal or external investigation. The specific course of an investigation and those involved will depend upon the nature of the reported concern. However, these will always be conducted ethically and in compliance with applicable law and Ciena policies.

While we encourage you to use internal reporting, the Code is not intended to restrict you from reporting a possible violation of law to a governmental authority or law enforcement, including making a disclosure that is protected under the whistleblower protections of applicable law.

Retaliation Is Prohibited

We strictly prohibit any form of retaliation against someone who, in good faith, reports—or participates in the investigation of—a possible violation of the Code, a Ciena policy, or applicable law. A good faith report may not necessarily be proven or later turn out to be true. Rather, good faith means that the report is made with a sincere and honest belief that the information is truthful.

As much as we encourage good faith reporting, we do not tolerate making knowingly false reports, which can divert resources from credible concerns. Never knowingly make a false accusation or engage in dishonesty in the reporting or investigation process. The strength of our teams comes from our shared integrity. We achieve together when we can trust each other to do the right thing.

ACHIEVING WITH RESPECT

At Ciena, our success is rooted in people. Our people are the key to a corporate culture of belonging, vibrancy, and happiness. Achieving together means treating one another with fairness and respect and keeping the workplace and our personal information safe and secure.

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Supporting an Inclusive and Respectful Workplace

Diversity, Inclusion, and Equal Opportunity

We are committed to attracting, developing, and retaining a highly qualified, diverse, and dedicated work force. We comply fully with all laws providing equal opportunity to all people. This means embracing our differences and promoting an inclusive workplace that values the diversity of our employees, customers, suppliers, and community partners. We support these goals by:

- Offering equal employment and advancement opportunities to the most qualified individuals, regardless of protected characteristics;
- Prohibiting discrimination; and
- Making reasonable accommodations for those with disabilities.

Avoiding Discrimination and Harassment

We promote a positive and inclusive workplace and a safe and welcoming environment. We achieve together and thrive as a team when we respect and treat each other fairly. We do not tolerate any form of discrimination, bullying, or harassment.

Discrimination is the act of treating someone more or less favorably based on their protected characteristics; for example, withholding a promotion, raise, or other employment condition because of the employee's race, gender, or other protected characteristic.

Harassment is behavior that creates an intimidating, hostile, or offensive work environment. It also includes behavior that unreasonably interferes with an employee's work performance. It can take many forms—sexual or non-sexual—and may include:

- Threatening or offensive remarks,
- Unwelcome sexual advances,

- Psychological or power harassment, and
- Derogatory, disparaging, or suggestive jokes, e-mails, or other unprofessional conduct.

We prohibit threatening, hostile, or abusive behavior in the workplace and will take immediate and appropriate action against offenders. For more information regarding discrimination and harassment, please refer to the [Global Anti-Harassment](#) policy.

Q I saw a colleague's manager insult him using religious slurs. The colleague didn't react to the offensive language and hasn't said anything. Should I speak with someone about the incident?

A Yes, please raise this with your manager, People & Culture, the Legal Department, or other appropriate company resource. This is unacceptable and against our Code. We promote a positive and inclusive workplace at Ciena free of bullying, harassment, and discrimination.

INTEGRITY TIP | DISCRIMINATION AND HARASSMENT

We value a diverse and inclusive workplace and do not tolerate discrimination or harassment based on any characteristic protected under applicable national, state, or local laws such as:

- Race
- Ethnicity
- National origin
- Ancestry
- Religion
- Age
- Genetic information
- Citizenship
- Disability
- Marital status
- Pregnancy or maternity
- Sexual orientation
- Sex
- Gender identity or reassignment and gender expression
- Veteran or military status

Protecting Personal Information

We take the privacy and security of personal information seriously and treat it with care. This applies whether the personal information relates to our team members or third parties.

Employee Personal Information

In the normal course of doing business, Ciena may obtain, hold, and share personal information of employees for identification, benefits administration, or other legitimate business purposes. If you have access to this information, you must take appropriate steps to protect it.

We respect and protect each other's personal information by:

- Never accessing or obtaining another employee's personal information without authorization;
- Never disclosing it to anyone inside or outside of Ciena without proper approval;
- Using it only for legitimate business purposes; and

- Always handling it with care and in compliance with all applicable laws, policies, and procedures.

For additional information, please see the [Data Privacy & Security site on Go/Ciena](#) and associated policies.

Q A customer asked me to share the personal contact information of their Ciena account manager, who has been ill, so they can send them a "get well" card and flowers. Can I share this information about my colleague?

A *No. While the customer means well, do not pass along the personal contact information without the team member's explicit permission to do so. Check with the Legal Department or People & Culture if you have questions.*

Third-Party Personal Information

We are committed to protecting personal data entrusted to us by customers, suppliers, or other third parties. We act with integrity by:

- Not collecting, holding, transmitting, or using personal data except as allowed by law and for legitimate purposes;
- Keeping it secure;
- Never sharing it with an unauthorized person inside or outside of Ciena;
- Never leaving it unsecured where an unauthorized person may find it; and
- Following Ciena policies and data protection and privacy laws.

If you have questions about handling personal data, ask your manager or an attorney in the Legal Department.



Promoting Workplace Safety

We all benefit from a secure, safe, and professional environment free from violence or hostility.

We achieve together when we observe all safety rules, use specified safety equipment, and exercise caution in all work activities.

We ensure the safety and security of all employees and company facilities by:

- Immediately following Environmental, Health, and Safety procedures when an accident occurs or if we notice an unsafe condition, and alerting a supervisor or People & Culture member;
- Never possessing or using illegal drugs or other controlled substances (except medications as prescribed by a doctor) while on company premises or while working;
- Never engaging in any threats or acts of violence, physical intimidation, or hostile or abusive behavior;

- Never possessing weapons during work hours or on company premises;
- Avoiding jokes about violence or property damage; and
- Allowing only authorized visitors in the workplace.

For additional information, please see our [Ciena Global Handbook](#).

Ciena will take immediate and appropriate action against violators. This includes termination of employment and referral for criminal prosecution where appropriate.

ACHIEVING WITH CARE

We all have a responsibility to protect Ciena's assets. These include physical property and systems as well as valuable intellectual property and proprietary and confidential information. Protecting our assets is critical. Exercise care and be alert to situations that could lead to the loss, misuse, theft, or unauthorized disclosure of our assets. Raise those situations to Corporate Security or your manager as soon as possible.



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Safeguarding Information

We frequently have access to proprietary, confidential, and other valuable non-public information. This information is the product of the hard work and innovation of many employees and significant investment by Ciena. Improper disclosure, even if accidental, would damage its value. We must follow all Ciena safeguards to protect this information, including only disclosing it as authorized by Ciena or as legally required. We safeguard information by:

- Taking care to avoid accidental disclosure;
- Never leaving important information or company property (like computers and devices) unattended;
- Never discussing proprietary or confidential information with an unauthorized person, including family or friends;
- Never discussing it where an unauthorized person can hear you—such as a crowded public area; and
- Remembering that inadvertent disclosures can happen in online communications, too, such as in blog posts or within a social network.

Q While in the airport traveling on company business, I sometimes make work-related calls. Is this a problem?

A *It could be. Avoid discussing confidential or sensitive company information in public places, such as in taxis, airports, elevators, or at conferences and trade shows. When it is necessary to make work-related calls in a public place, be careful and mindful of your surroundings.*

Protecting Intellectual Property

We protect Ciena intellectual property and respect that of competitors and other third parties.

In our roles, we could have access to—or be involved in developing—Ciena intellectual property. When we join Ciena, we enter an agreement with specific obligations about this. For example, we assign our rights in certain intellectual property we develop to Ciena. This may include ideas, inventions, software, templates, publications, and other materials relating to Ciena. Subject to the laws of each country, this applies no matter where or when—at work or after work hours—the creation occurs.

We honor this agreement by:

- Disclosing this intellectual property to Ciena and
- Protecting it like any other Ciena proprietary information.

Information on how to report and protect intellectual property can be found at the [Intellectual Property & Innovation](#) site.

Third-Party Software

We must be careful when obtaining any third-party software (including open-source software). Software licenses include rights and obligations that must be observed, such as:

- How and where the software may be used;
- Whether it may be modified or distributed; and
- Possibly related rights that Ciena must grant to others.

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We safeguard our teams and our company by:

- Observing Ciena's Software Governance and cybersecurity requirements, such as our Third-Party Cyber Risk Assessment procedures, and Generative AI Appropriate Use Policy, and
- Ensuring these requirements are satisfied before:
 - Installing software onto any device provided by Ciena or used primarily for Ciena business purposes (including accessing Ciena data or information assets);
 - Distributing, accessing, or receiving software from inside or outside of Ciena; and
 - Accepting a license agreement.



INTEGRITY TIP | SOFTWARE SAFETY

Did you know that even if software is free, it may be unacceptable to use within Ciena's network or in our products? The license may not permit that type of use, or the software may contain harmful viruses, trojan horses, or ransomware within the code. That's why it's critical that we follow our Software Governance and Third-Party Cyber Risk Assessment procedures. We put safety first by always making careful decisions and following company processes.

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Using Ciena Assets Appropriately

We achieve together by protecting Ciena’s assets and using them appropriately. In addition to the categories previously discussed, Ciena assets also include things such as equipment, systems, facilities, supplies, cash, credit cards, and company time. We use these for legitimate business purposes only. Together, we share a responsibility to protect Ciena property from loss, damage, misuse, and theft.

Ciena Assets and Opportunities

We act in the best interests of Ciena. That’s why we always use Ciena assets and property for Ciena’s benefit. We do not use corporate property, information, or our positions for personal gain or accept improper personal benefits due to our status as employees. We advance Ciena’s interests when a business opportunity arises that belongs to Ciena, and do not take those opportunities for ourselves or for others.

Communications and Data Systems

We rely on Ciena communications and data systems to do our work every day. These include, for example:

- Telephones and mobile devices,
- Third-party and cloud-hosted services,
- Messaging services,
- Collaboration platforms,
- Computers and computer networks,
- E-mail systems and Internet services, and
- Other similar tools.

Operating in “Ciena Time” means working with efficiency to satisfy our customers’ needs.

We must ensure that any personal use of Ciena systems doesn’t get in the way of our commitment to customers and each other.

When communicating by Ciena e-mail and written and electronic communication systems, we should try to limit our use to business purposes only. Ciena may allow limited personal use of these communications systems if:

- There is no significant cost to Ciena;
- It does not compromise Ciena's interests or your job performance;
- It does not introduce any security risks; and
- It is not for personal gain or any improper purpose.

All communications and information transmitted or stored on Ciena's communications systems are Ciena's property. Personal materials such as photos, videos, or music should *not* be stored on Ciena's network storage drives or any company-owned system. To ensure efficient and productive use of communications

systems and storage, Ciena may periodically access or remove such files and monitor use of these systems.

Additional information on the use of Ciena's communications and data systems can be found in our [Information Security and Acceptable Use](#) policies.

Q To break up the workday, I sometimes spend a few minutes browsing online or checking my personal e-mail. I still get all my work done on time, and I'm careful about the websites I visit. Am I doing anything wrong?

A *Probably not, but you still need to be careful. You may use Ciena's technology and communication systems for incidental personal use. But be careful this doesn't interfere with your duties or introduce security risks. Also remember this activity is not private, as explained in Ciena's [Right to Access](#) on page 21.*

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INTEGRITY TIP | COMMUNICATION RESOURCES

We may not use Ciena’s communications resources for any of the following purposes:

- Political activity;
- Soliciting or distributing material unrelated to Ciena’s business;
- Gambling;
- Accessing pornographic or sexually explicit material;
- Accessing offensive, demeaning, discriminatory, harassing, or disruptive material;
- Using or downloading unlicensed or unapproved software;
- Duplicating or using material in violation of copyright law;
- Conducting commercial activity of another business; or
- Initiating unauthorized mass e-mails or “spam.”

Ciena’s Right to Access

When using Ciena communications and data systems, we should not have any expectation of privacy in information that we send, receive, access, or store—whether for business or personal purposes. Where and as permitted, Ciena may monitor workplace communications, such as Internet use, computer files, and e-mail or voicemail messages. Deleting files

or protecting them with passwords may not prevent them from being observed, as electronic communications are not always destroyed when “deleted,” and passwords can be overridden in some circumstances.

For more information, refer to Ciena’s [Information Security](#) and [Acceptable Use](#) policies.

Returning Ciena Assets

When leaving Ciena for any reason, including retirement, we must return all Ciena assets. These include documents and media containing Ciena proprietary or confidential information. Ciena’s ownership of intellectual property created as a Ciena employee will continue after one’s departure.



Exercising Care in Public Communications

Our strong reputation is one of our most important assets. To protect it, our external communications—to investors, customers, business partners, government bodies, and the public—must be fair and accurate. All public communications should be coordinated in advance with Investor Relations or Corporate Communications. These include contacts with news media and the financial or investor community.

Social Media

At Ciena, we thrive as a team united under our shared values and mission. But we must be careful to keep our personal interests separate from those of the company.

When you speak out on public issues or in a public forum, you do so as an individual. You should not give the appearance of speaking or

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acting on Ciena's behalf. This is particularly important when using social networking platforms. These services are increasingly being monitored by clients, colleagues, and regulators.

We achieve together by:

- Following Ciena's Social Media policy to guide our online activities;
- Never misrepresenting our own beliefs as those of the company; and



- Alerting a manager or Corporate Communications if we believe social media or electronic communications are being used inappropriately.

Q I keep a blog so my friends and family know what I'm up to. Work is a big part of my life, and sometimes I post details about what I'm doing at Ciena. For example, the other day I said I was involved in a new project that will add features to Ciena's data center solution. Is this okay?

A No. It's natural to want to tell others about what we do. But we need to be careful not to reveal confidential information in social media or other forums. Information about products and services we're developing or innovating, for example, needs to stay within Ciena until the company decides it's ready to announce to the public.

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Making Commitments and Obtaining Commercial Approvals

We keep our promises to customers, partners, and each other. That's how we build trust in our relationships. It's critical that we base each promise on integrity by making commitments and obtaining approvals in a fair and honest way.

Commercial Approval Processes

Ciena's internal approval processes help us protect our assets and maintain appropriate controls. Within these processes, certain functions and managers have oversight regarding:

- Pricing,
- Contract terms and conditions,
- Execution and approval of agreements, and
- Other actions.

We must never make business commitments outside of these processes and controls, or without appropriate approvals.

For additional information regarding commercial approvals, please review Ciena's [Commercial Controls and Governance Guidebook](#) and the [Review and Approval of Agreements](#) policy.



Side Letters & Side Agreements

Side letters and agreements are written or verbal agreements intended to circumvent our normal contract processes, or which are not shared with internal stakeholders or posted to our contract repositories. These can have significant consequences and may harm our relationships with business partners or cause us to inaccurately account for any related financial statement impact.

We achieve together by:

- Never entering into side agreements;
- Ensuring that any intent to change an agreement be put in writing and approved under standard processes; and
- Contacting our relevant representative in Procurement or Commercial Management, or the Legal Department, to make or change a contractual obligation.



Q I was asked to change the terms of our sales contract via e-mail and to give the customer an extended payment period. What should I do?

A *Talk to your manager or an attorney in the Legal Department if you are being asked or pressured to make a side commitment like this. Side commitments can impact the accuracy of our financial reporting, cause customer satisfaction issues, or create other legal risks.*

Creating and Maintaining Corporate Records

Ciena's records are our corporate memory, documenting actions and decisions. They represent a vital asset supporting daily functions and operations. We achieve together when we create and maintain corporate records appropriately and in compliance with applicable law and Ciena policy and procedures.

Communications

Achieving together means that we act with integrity in every aspect of our work. We communicate with respect and accuracy, including through e-mail and other forms of written communication, by:

- Being concise, factual, attentive, respectful, and prudent;
- Avoiding sarcasm and hyperbole, which may be misleading out of context;
- Avoiding offensive or exaggerated language; and
- Never creating false or inaccurate records.

Financial Controls and Reporting

Financial integrity and fiscal responsibility are core aspects of how we do business. We all have responsibility to ensure our financial records are complete and accurate.

As a team, we do the right thing by:

- Recording and maintaining financial records and preparing our results of operations ethically, honestly, and in accordance with applicable legal requirements;
- Ensuring all information that we record or report is accurate and complete;
- Following our internal controls;

- Promptly correcting misunderstandings;
- Never making misrepresentations or dishonest statements; and
- Never assisting anyone else to account for something improperly or to make false or misleading financial records or reports.

Reporting inaccurate or incomplete information, or reporting in a way intended to mislead or misinform, is prohibited and could lead to serious consequences.

Retaining Records

Business records include information we create or receive, regardless of format, related to Ciena's business. These records are the property of Ciena. We must retain them appropriately and in accordance with our [Records Management](#) policy.

We use approved channels for business communication and do not use unapproved or ephemeral messaging applications (e.g., where the message disappears upon reading) to avoid creating business records. If a business record is inadvertently created, stored, or transferred using a non-Ciena messaging tool, make sure to promptly enter and maintain the record according to our [Records Management](#) policy.

The Legal Department may at times issue a records hold notice requiring the retention of certain records in connection with legal matters, investigations, or audits. You may not destroy, alter, mutilate, or conceal any record subject to an active hold notice, even if outside its normal retention period. Immediately contact an attorney in the Legal Department if you know about any potential litigation, investigation, or audit.

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ACHIEVING WITH INTEGRITY



Our customers and community trust us to act with integrity and hold ourselves to the highest standards. We honor that trust by dealing fairly with others and following the law wherever we do business. Achieving together means doing the right thing—upfront and every time.

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Avoiding Conflicts of Interest

Conflicts of interest can arise when our personal interests (or those of a spouse, domestic partner, or other family member) are or appear to be at odds with those of Ciena. These conflicts can impact our decisions and performance, erode trust, and harm our reputation.

We uphold our reputation and make fair and objective decisions by:

- Avoiding situations that create actual or perceived conflicts of interest,
- Promptly disclosing potential conflicts to our manager and in accordance with Ciena’s Conflicts of Interest policy, and
- Recognizing that directors, executive officers, and their families have special requirements in certain situations involving potential conflicts of interest, including under our Related Party Transactions policy.

Of course, not every conflict can be avoided, and having a conflict may not always be a problem. But not disclosing these could lead to bigger ethical or legal issues. Many conflicts

can easily be addressed if promptly raised and properly managed.

We expect you to follow the Conflicts of Interest policy and to appropriately disclose and ethically handle potential conflicts, such as those involving:

- Outside employment and business activities,
- Financial interests in other businesses, or
- Employment of close relatives.

It’s impossible to anticipate every potential conflict that might arise. If you feel that a situation might reasonably compromise—or appear to compromise—your objectivity on behalf of Ciena, discuss it with your manager or other appropriate company resource.

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Outside Employment and Business Activities

We do not engage in outside business activities that would negatively impact our attendance or performance at Ciena or improperly use or disclose Ciena's confidential information. As Ciena employees, we must also avoid working for competitors, suppliers, partners, or customers of Ciena. Disclose any such conflicts and seek approval in accordance with our Conflicts of Interest policy before accepting:

- Outside employment;
- Consulting assignments;
- Paid speaking engagements;
- Service on boards of directors or advisors of for-profit organizations or non-profit organizations potentially related to Ciena business; or
- Similar activities.

INTEGRITY TIP | PROFESSIONAL PRESENTATIONS AND TECHNICAL PAPERS

At Ciena, we take pride in the thought leadership of our highly talented people. We encourage you to teach, present at professional or technical meetings, and publish articles, papers, or books. However, these activities must not interfere with your duties or risk disclosing Ciena confidential information. If offered, you may ordinarily accept reasonable and customary fees or honoraria for these activities. Check with your supervisor and the Legal Department for help determining if an opportunity is appropriate, and obtain prior approval in accordance with our Conflicts of Interest policy.

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Financial Interests in Other Businesses

A conflict can arise if you have a financial interest in one of our suppliers, customers, business partners, or competitors. You may not acquire a material financial interest in a competitor of Ciena. You also may not acquire a material financial interest in a supplier, partner, or customer of Ciena that you or those who report to you deal with, except as disclosed and approved in accordance with our Conflicts of Interest policy. Also, you may not approve a purchase order, negotiate or enter a contract, or incur an expense on Ciena's behalf for a transaction in which you or any member of your immediate family has a material financial interest.

Employment of Relatives

Hiring a close relative like a parent, child, sibling, spouse, or domestic partner of a current employee could create a conflict of interest. Ciena may consider hiring a close

Q My spouse works for a Ciena competitor. Does this constitute a conflict of interest?

A *Not necessarily, but you should discuss the situation with your manager. Never disclose Ciena confidential information to your spouse or seek confidential information from your spouse about their employer.*

Q My daughter is looking for a job and wants to work for Ciena. Can she apply even though I work here?

A *Your daughter can apply as long as the position does not report to you (and you would not be reporting to her). Her application will be evaluated under the same criteria as all other applications. You may not influence the hiring process.*

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relative of a current employee if the two would have different reporting managers and no day-to-day working relationship. If you work with a close relative at Ciena, neither of you may hold a position reviewing employment decisions directly or indirectly affecting the other. If a potential conflict arises, disclose it in accordance with our Conflicts of Interest policy.

Q A friend asked me to invest in a company that will make a product that Ciena might eventually buy. If my only involvement in the company is financial, is it a conflict of interest?

A *This could present a conflict, depending on your position with Ciena, your influence in Ciena's purchasing decisions, the size of your investment, and the importance of Ciena as a future customer to the company. Before investing, you should follow our Conflicts of Interest policy and seek written approval.*



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Preventing Insider Trading

In the course of our work, we might possess sensitive information about Ciena or other businesses. We must be mindful about how we handle and use this information. We may never use it for an improper purpose, including insider trading.

Insider trading means transacting in a company's stock or other securities when one has "material, non-public information" about the company. Insider trading is against the law—whether you misuse the information for your own gain or "tip" (pass it on to someone else who trades in the securities).

INTEGRITY TIP | INSIDER TRADING AND MATERIAL NON-PUBLIC INFORMATION

In general, *material, non-public information* means information that is not publicly available and that a reasonable investor would consider important in deciding whether to buy, hold, or sell stock. The information may relate to Ciena or one of our customers or business partners and may include information about:

- Financial performance;
- Acquisitions or divestitures;
- Stock or debt offerings;
- Senior management changes;
- Significant new products or customers; and
- Other similar information likely to have an impact on financial results or stock price.

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Directors, executive officers, and certain employees who regularly have access to material, non-public information are subject to Ciena’s quarterly “blackout periods” during which they may not trade in Ciena stock. The Legal Department will contact you if you are subject to these restrictions. Even if these periods are not applicable to you, insider trading laws still apply to you.

We achieve together by:

- Never buying or selling stock on the basis of material, non-public information;
- Never “tipping” or passing the information on to others, such as friends and family, so they may do so;
- Reviewing Ciena’s [Insider Trading](#) policy for important details and requirements; and
- Contacting the Legal Department with questions.

Our [Insider Trading](#) policy also prohibits certain other transactions in Ciena securities, such as short sales, by certain applicable parties regardless of whether they have material, non-public information. Please see the [Insider Trading](#) policy for additional information.

Q I inadvertently revealed to a friend that Ciena is negotiating with another company on a possible strategic alliance. What should I do?

A *Disclosure of this type of sensitive information is a violation of company policy, even if inadvertent. Immediately inform the recipient that the information is confidential and should not be used or shared with anyone else. In particular, the recipient must not trade in the stock of Ciena or the other company until either company publicly discloses the transaction. You must also report the disclosure to the Legal Department.*

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Q A colleague told me she is working on a contract for a recent RFP win with a global webscale provider, taking this business from one of Ciena's competitors. This will be big news in the market. Am I allowed to trade our stock, the new customer's stock, or that of our competitors based on this information?

A *No, you may not buy or sell securities based on this non-public information. If the contract is reasonably likely to be material to Ciena, the customer, or Ciena's competitors, you cannot trade until the information is public. Ciena could be harmed even by the appearance of insider trading. If you suspect that you have material, non-public information, consult the Legal Department before making any trades based on that information.*

Dealing Fairly with Others

We deal fairly and ethically with our customers, suppliers, business partners, and colleagues. Together, we do the right thing by:

- Making only complete, factual, and truthful statements about Ciena, our products, and our services;
- Ensuring our advertising and marketing claims are substantiated, accurate, and complete;
- Following laws and regulations governing how customers acquire our products and services; and
- Following the laws that govern how we honor our contractual obligations.

If you feel that we are not living up to these commitments, please raise your concern with your manager or the Legal Department.

Competing Fairly

We take pride in the products and services we offer, which stand on their own merits. We do not misrepresent them or engage in any other unfair practices. Our outstanding teams and innovations are all we need to thrive.

We follow all laws designed to encourage and protect free and fair competition. These laws are known as antitrust, competition, or unfair competition laws. They prohibit agreements and practices that restrain competition, such as:

- Price-fixing, or coordinating prices with a competitor;
- Dividing sales opportunities or markets;
- Alternating or rigging bids;
- Boycotting or refusing to deal with a supplier or customer;
- Pricing plans intended to run a competitor out of business; and
- Stealing trade secrets.

Q I am attending a trade association event and competitors may be there. Do I need to be careful?

A Yes. Trade associations often involve participants from competing entities, and antitrust and fair competition rules apply there as elsewhere. Do not share competitively sensitive information, and avoid discussions on any competitively sensitive topic. If you have questions or concerns, consult an attorney in the Legal Department.

We compete fairly and avoid even the appearance of improper competition by:

- Complying with antitrust laws and protecting fair competition;
- Not misrepresenting competitors or drawing unfair or untruthful comparisons between our products and services and theirs;
- Not discussing competitively sensitive topics with competitors, such as pricing, costs,

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marketing plans, promotions, production, research and development, customers, markets, and bids; and

- Stopping the conversation and contacting the Legal Department if approached by a competitor about such topics.

Laws in this area are vigorously enforced. Violations can result in severe penalties including fines, criminal liability, and imprisonment. Although the spirit of these laws is straightforward, their application can be complex. If you have questions, please contact an attorney in the Legal Department.

Q I was inadvertently sent an e-mail with a competitor's pricing data. What should I do?

A *Do not read it, forward it, or share it with co-workers or your manager. Immediately contact an attorney in the Legal Department and wait for further instructions.*

INTEGRITY TIP | MARKET RESEARCH

While we may conduct legitimate market research and use publicly available information, we must not:

- Use deception, theft, or other illegal or unethical means when conducting competitive research;
- Misrepresent ourselves or our purpose in researching a competitor;
- Influence anyone to violate a confidentiality obligation; or
- Ask new employees for confidential information about former employers.

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In the normal course of our business, we may encounter confidential information about other organizations, including our customers, suppliers, business partners, and others. We exercise the same care with their confidential information as we would with our own. We do the right thing by:

- Using confidential information only for legitimate business purposes;
- Using it only as allowed by any applicable disclosure agreement, Ciena policy, and applicable law;
- Not using information we suspect has been obtained improperly about another company; and
- Promptly informing our manager or the Legal Department if we learn of an unauthorized disclosure of another company's confidential information.



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Preventing Bribery in All Forms

As a global team, we achieve together by doing the right thing every time, everywhere. We prohibit bribes and other improper payments anywhere in the world.

We follow our Anti-Bribery and Improper Payments policy and all anti-bribery and anticorruption laws that apply where we do business, including, for example, the:

- U.S. Foreign Corrupt Practices Act (FCPA),
- UK Bribery Act (Bribery Act), and
- Brazilian Clean Companies Act.

We may not offer, authorize, promise, or provide anything of value to anyone, whether governmental or private, for any improper purpose including:

- To influence any act or decision, including to perform, delay, or refrain from any official act, or
- To obtain or retain business or secure an improper business advantage.



Improper payments not only violate our policy but may also lead to serious civil and criminal penalties for those involved and Ciena. These behaviors or allegations can also damage Ciena's business reputation. Always maintain accurate records and accounts of our transactions and payments, and stay alert to possible improper payments by third parties with which we work.

Business Partners and Commercial Representatives

We hold our business partners to these same expectations. No one may offer, make, or receive improper payments related to Ciena business or on our behalf. This includes resellers, distributors, suppliers, service and support providers, agents, and consultants.

We create outstanding global partnerships by:

- Choosing partners carefully and conducting risk-based due diligence;
- Establishing and maintaining appropriate written agreements with our business partners;
- Avoiding side deals or other commitments outside of our contracting processes (see [Making Commitments and Obtaining Commercial Approvals](#));
- Maintaining awareness of the third parties with which we work;

- Staying alert to any warning signs of improper conduct; and
- Raising concerns about any potential improper payments to the Legal Department immediately.

Q A large customer is expanding its footprint into a new country in my region and has recommended a particular subcontractor for the project. I notice the subcontractor's proposal for the work includes an unusual "Commitment Fee." I'm not sure what this is, and I have not received a clear explanation. What should I do?

A *You are right to question this fee, which could be an attempt to conceal a kickback or other improper payment. Seek clarification of any requests for vague and unusual payments to ensure they represent only legitimate goods or services and are properly documented. If you have any concerns, please raise them with your manager or an attorney in the Legal Department.*

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Remember, Ciena could be held responsible for the improper actions of a third party even if we're not actively involved in any wrongdoing. For more information, please see our [Anti-Bribery and Improper Payments](#) policy.

Q In my country, making small payments to speed up government paperwork is common. Not making them could add a long time to the process. What should I do?

A *This type of payment may be illegal, and Ciena policy prohibits so-called "facilitation" or "grease" payments even if common in a particular location. Do not make the payment, and notify your manager and an attorney in the Legal Department.*

INTEGRITY TIP | FACILITATION PAYMENTS

We prohibit "facilitation payments." These are payments to a Government Official to secure or speed up an otherwise non-discretionary, routine governmental action such as:

- Obtaining a permit or license,
- Processing a visa,
- Scheduling an inspection, or
- Obtaining customs clearance or approvals.

Even if customary in a particular place, facilitation payments are illegal under many anticorruption laws and prohibited everywhere by Ciena policy. If you are asked to make, directly or indirectly, a facilitation payment relating to Ciena's business, immediately inform an attorney in the Legal Department.

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Giving and Receiving Appropriately

At Ciena, we are driven to innovate, excel, and outperform our best every day. That's what makes our people and technology so exceptional. We compete on the merits of our solutions and services, and not through inappropriate gifts, entertainment, or other business courtesies.

While gifts and hospitality, such as routine business meals, can be a part of promoting a strong working relationship, they can also create the appearance of wrongdoing or, worse, violate the law. Whether giving or receiving, we must always follow applicable laws and Ciena policies.

We achieve together by:

- Not requesting gifts or hospitality from customers, suppliers, or other business partners;
- Not exchanging gifts or hospitality that are excessive, that are or appear improper, or that are inconsistent with Ciena policy;
- Ensuring anything we offer or provide is modest and infrequent, clearly for legitimate business purposes, and handled transparently; and

Q A supplier invited me to attend a sporting event. Can I accept?

A *It depends. You should consider whether accepting could—or could appear to—compromise your objectivity. Consider the fair value and frequency of the offer, whether the supplier will be present, and the status of the business relationship. If offered something of more than nominal value, inform your manager. Don't accept it unless you have received any necessary approvals under Ciena's policies and procedures.*

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- Never using gifts or hospitality, including meals, travel, or entertainment, to gain an unfair business advantage or cause someone to act inappropriately.

We do not give or receive gifts of cash or cash equivalents (such as gift cards, gift certificates, cybercurrency, loans, stock, etc.). Nor may we give anything that would violate a recipient's internal requirements, such as their own code of conduct.

For more information, see our [Gifts and Hospitality](#) and [Anti-Bribery and Improper Payments](#) policies. If you have a question or are requested by a third party to provide gifts or hospitality, please notify your manager, the Legal Department, or Corporate Compliance.

Activities with Government Officials

Special rules apply in interactions with Government Officials. Even modest offers of a simple meal or refreshments could



INTEGRITY TIP | GOVERNMENT OFFICIALS

Government Officials include any officer, director, or employee of: a governmental entity, agency, department, or similar; a government-owned or controlled entity or enterprise; or a public international organization such as the World Bank or European Commission. It also includes any person acting in an official capacity on behalf of a government or organization above, a political party, or a party official or candidate for public office.

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be prohibited by law. Contact the Legal Department or Corporate Compliance before offering or providing any gift, hospitality, travel, or similar expense involving a Government Official anywhere in the world.

Recording Expenses

Any expense relating to gifts or hospitality, including any sponsored travel or lodging, must be properly and accurately recorded



in Ciena's books and records. Expense reports and other related records must be truthful, complete, and reflect sufficient detail. We cannot use personal funds or vehicles to bypass the requirements of this Code or other Ciena policy or procedure.

Q I received a box of sweets from a supplier in celebration of the Diwali holiday. Nothing is expected of me in return. I am not involved in any business decisions regarding the supplier. Can I accept the gift?

A Yes, assuming it's nominal in value and wouldn't create a potential conflict of interest. If unsure of the value, estimate it using your best judgement. If in doubt, discuss it with your manager and seek appropriate approval before accepting.

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Exceptions

Any exceptions to these guidelines require approval. Please reference Ciena policies and procedures including the [Gifts and Hospitality policy](#).

Q I'm working with a customer in a different country on a large network deployment project. We need to get approval from a government agency to move forward. To speed up the process, the customer suggested offering the inspector a paid trip to a nearby beach resort. This doesn't feel right, but I don't want to hold up the project. What should I do?

A *Talk to your manager or an attorney in the Legal Department immediately. It sounds like the client representative may be suggesting a bribe, and that's not how we do business. We always act ethically and legally in our business dealings. We never resort to bribery.*



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Government-Related Business

Special rules and regulations apply when we are working with a government customer or Government Official, or on a contract funded by the U.S. Government. In these situations, we must work as a team to ensure that we use public funds properly, demonstrate integrity, and avoid potential fines and other penalties. In addition to following contractually agreed terms, we achieve together by:

- Complying with relevant government procurement requirements;
- Ensuring all reports, certifications, statements, and claims to the government are accurate and complete;
- Assigning all time and costs to the proper category and contract;
- Following applicable accounting requirements such as the U.S. Government Cost Accounting Standard (“CAS”);
- Using government property for specified purposes only, and never for personal or non-contractual use;

- Complying with all requirements relating to organizational conflicts of interest; and
- Following Ciena’s policies, processes, and requirements regarding government contracts and accounting.

For more information about the rules that apply, please consult with the Legal Department. For U.S. Government related procurement, consult with the Ciena Government Solutions team.

Hiring Former Government Employees

There are many laws around hiring former government employees or retaining them as consultants. These may even cover informal

arrangements regarding future employment. We must obtain written approval from the Legal Department before:

- Discussing potential employment with any current government employee and
- Hiring or retaining anyone who has worked for the government in the past two years.

Q I would like to take a staff member of a U.S. Government agency to dinner to discuss a potential network opportunity that could benefit Ciena. Is this allowed?

A *Probably not. United States federal, state, and local laws and requirements significantly restrict gifts, travel, meals, and entertainment involving Government Officials and their family members. We may not give gifts, travel, meals, or entertainment in this case. In the very limited situations in which you believe providing any of these items may be appropriate, you must seek prior approval from the Legal Department.*

INTEGRITY TIP | OCIs

Organizational conflicts of interest (OCIs) can arise when a contractor's performance on one government contract, or its other activities or relationships:

- Hinders its ability to perform on another government contract or
- Compromises its ability to compete for a government contract fairly.

An OCI could arise, for example, where a company is engaged to define requirements for an RFP and then seeks to compete in that RFP. We must be careful to avoid OCIs and any type of conflict of interest. Please contact the Legal Department if you have any questions or concerns.

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Our people make up an outstanding global team. Achieving together means acting with integrity all over the world. No matter where we work, we are committed to complying with all applicable laws and regulations governing the import, use, export, and re-export of Ciena products and technology. Regardless of our work assignment or location, our actions may have trade compliance implications.

At Ciena, we create products with sophisticated technology that may be controlled for export under the laws of various countries. Under applicable trade laws, there are places we cannot do business, people or entities we cannot sell to, and certain end uses of our products that are not permitted.

We act with integrity by:

- Complying with U.S. export rules and applicable non-U.S. laws and regulations



regarding the export, re-export, and delivery of our products and services;

- Following the policies and procedures developed by our Global Trade Compliance team to avoid doing business with prohibited entities or people; and
- Obtaining any required export licenses and other approvals before exporting products and technology controlled by the U.S. Government.

As an importer, Ciena must similarly follow all applicable import laws, regulations, and requirements when engaging in international trade. This includes compliance with obligations

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made to government agencies when participating in supply chain security and other trusted partnership programs. Sometimes business situations with import implications can be subtle. In addition to the cross-border movement of physical items, other activities can have import implications, such as:

- Changes in manufacturing location, processes, or source of supply;
- Client activity requiring cross-border delivery;
- Shipment of marketing samples or prototypes cross-border;
- Determination of product country of origin; and
- Maintenance of accurate data and records for product inventory, sales, and shipment.

Import and export controls affecting our business can be complex. If you have any questions, contact Ciena's Global Trade Compliance team.

Export Laws

Export laws and regulations cover more than just physical shipments of products. They can also cover, for example:

- Electronic transfers of, and remote access to, software or technology;
- Provision of services over a network, including e-business and e-services;

Q I'm e-mailing specifications about our optical transport systems to a partner in another country. Is this an export subject to additional controls?

A *It could be, depending on what you're sending and where. Whenever sending technical information to another country or to a company based elsewhere, we should check with Ciena's Global Trade Compliance team. In some cases, we may need to obtain a license or other permission before sending. If unsure about the requirements, speak to your manager or Ciena's Global Trade Compliance team.*

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- Design, development, and delivery of hardware, software, and solutions;
- Travel outside the U.S. with Ciena products or technology;
- Providing technical specifications and performance requirements to suppliers;
- Disclosures of Ciena technology to recipients that are not citizens or permanent residents of the country (e.g., where the recipient is a non-U.S. person located in the U.S.); and
- The transfer of personal knowledge (technical assistance) outside the U.S. or country of residency.

Sanctions and Boycotts

We do not participate in or cooperate with boycotts that are not approved by the U.S. Government. Under U.S. anti-boycott

legislation, we are required to report any request to participate in an international boycott. We should not respond to any request for information, proposed contract provisions, shipping documents, or other action related to furthering an illegal boycott.

If you receive a request related to a boycott, immediately contact the Legal Department.

Q I work with Ciena outside the United States. Do U.S. export control laws apply to me?

A Yes. Ciena is a U.S.-based company. That means the operations of all Ciena companies, wherever located, must adhere to U.S. export control laws and regulations.

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We believe it is vitally important to be good stewards of the environment, supporters of the communities where we work and live, and business partners to our customers and suppliers. Our legacy will ultimately be what we do to make a difference.

Supporting Charitable and Community Activities

Through our social and community engagement, we aim to mobilize our core strengths—our people, innovation, and partnerships—as a force for good. We are committed to doing our part in the communities where we live and work. Ciena donates to several philanthropic non-profit organizations and actively supports STEM (science, technology, engineering, and mathematics) education programs.

Our strong, employee-powered Ciena Cares program is supported by Champions across the globe. We encourage employees to support charitable and community organizations and activities with personal contributions of volunteer time or money, as long as they do not use company time or resources or violate Ciena policy. Only organizations that are treated as tax-exempt charities or otherwise recognized under applicable law as having a charitable purpose may be approved for corporate matching funds.



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If you would like to obtain the support of the company or other employees for fundraising events or other charitable activities, follow Ciena’s policies including the [Gifts and Hospitality](#) policy and obtain any required approvals in advance.

Digital Inclusion

We are dedicated to enabling greater connectivity to help improve the lives of people around the world.

We know that greater digital connection can expand opportunities for more people—especially for students and those who have historically been underserved. Ciena has made a long-term Digital Inclusion commitment to address the digital divide in underserved communities. By mobilizing our people, innovation leadership, and

partners through programs that foster digital access, technology, and skills, we can help underserved students gain access to the opportunities they need to thrive.



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Respecting the Environment

We recognize our responsibilities to environmental protection and conservation as they relate to our products, services, and operations.

Together, we respect the environment by:

- Taking innovative and proactive steps to reduce our environmental footprint;
- Positively contributing to our communities and to society at-large;
- Striving for technology innovation that enables our customers to “do more with less”—less power, less space, and less cost; and
- Focusing on the environmental impact of our operations.

We expect our suppliers and business partners to adhere to these same principles. These principles, rooted in compliance with



applicable laws and regulations, are designed to encourage our suppliers and partners to go beyond simply complying to advance social and environmental responsibility. For more information on Ciena’s activities in this area see the [Corporate Social Responsibility](#) page on Go/Ciena and [ciena.com](#). For additional guidance, refer to the [Environmental, Health and Safety](#) policy and our [Supplier Requirements](#).

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We expect our suppliers to adhere to the principles set forth in this Code and the Responsible Business Alliance Code of Conduct, which addresses standards for labor, health and safety, the environment, and business ethics.

Conflict Minerals

Ciena is committed to sourcing the components we use in our products in an ethical and socially responsible way. We achieve together by:

- Supporting efforts to eliminate the use of tantalum, tin, gold, and tungsten obtained from sources that finance or benefit armed groups in the Democratic Republic of the Congo or its adjoining countries;
- Complying with applicable legislation regarding the reporting of conflict minerals; and
- Exercising due diligence to meet this obligation and support our commitment to responsible sourcing.

Human Rights

We are committed to compliance with all applicable employment and human rights laws and regulations. We achieve together by:

- Providing fair wages and reasonable working hours for those who work on our behalf and
- Upholding our zero-tolerance policy for the use of child or forced labor or human trafficking practices.

We avoid business with suppliers or business partners who violate these commitments. Ciena could be held accountable for their conduct. If you believe that a third party is violating these commitments, report it to your manager or the Legal Department.

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Political Contributions and Activities

Ciena supports employees' rights to engage in the political process. But we must keep personal political contributions and activities separate from Ciena. We must not conduct these activities on company time or using company resources. We may not make or commit to political contributions on behalf of Ciena.



Election or Appointment to Government Office

We are free to serve in an elected or appointed public office as long as our duties do not interfere with our obligations to Ciena. We avoid even the appearance of a conflict of interest by:

- Not participating in activities of a community or governmental body that might have an impact on Ciena's activities or business;
- Contacting our People & Culture representative or the Legal Department if unsure about the appropriateness of an opportunity; and

Disclosing potential conflicts of interest in accordance with our Conflicts of Interest policy.



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We are all responsible for adhering to the standards of conduct outlined in this Code. If you wish to seek a waiver of any provision of the Code, you must fully disclose the circumstances in advance and in writing to your manager and your People & Culture representative, who will coordinate any required review and approval. Waivers of our Code for executive officers or directors must be approved in advance by the Board of Directors. If a waiver is granted, the circumstances may be made public as required, including prompt disclosure of waivers for directors or executive officers.

Enforcement

Achieving together means acting as one team, united in our values. We are all responsible for following the law and doing the right thing. It is our policy to prevent unethical or unlawful behavior, to immediately stop it when detected, and to discipline those who engage in it. We will also discipline managers who fail to exercise appropriate supervision and oversight, allowing this behavior to go undetected. To facilitate effective operation of the Code, violations will be promptly and consistently addressed.

It is important that we are each responsible for our own actions. Disregarding this Code or other Ciena policies can have severe consequences for those involved and Ciena. Violations of the Code or other Ciena policies are grounds for disciplinary action, up to and including termination of employment or engagement. In some cases, criminal and civil prosecution may also be pursued. Ciena's General Counsel oversees compliance with this Code and related policies and procedures. Each member of Ciena management is responsible for ensuring compliance with the Code and all policies and procedures in their areas of responsibility.

Resources

We have many resources to help us follow the Code and make good decisions for our company. In addition to the resources described throughout the Code, the following may be helpful.

Other Resources

Audit Committee of the Board of Directors:
auditcommitteechair@ciena.com

EthicsPoint: www.ethicspoint.com

[Go/Ciena Legal Section](#)

[Go/Ciena Compliance Section](#)

[Ciena Policies and Procedures](#)

[Ciena Global Handbook](#)

[Corporate Disclosure Policy](#)

[Ciena Code of Ethics for Senior Financial Officers](#)

[Ciena Code of Ethics for Directors](#)

[Ciena Partner Network \(CPN\) Code of Business
Conduct and Ethics](#)

[Ciena Supplier Requirements](#)

[Responsible Business Alliance Code of Conduct](#)





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