

Anti Modern Slavery Report



VIAVI Solutions Inc. Report Prepared Pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act

1. Introduction and Identity

This Report is produced by **VIAVI Solutions Inc.** ("**VIAVI US**"), on behalf of itself and its subsidiary **VIAVI Solutions Canada ULC** ("**VIAVI Canada**" and collectively, "**VIAVI**", "**our**", "**us**" and "**we**") for the financial reporting year ended December 31, 2023 (the "**Reporting Period**") and sets out the steps taken to prevent and reduce the risk that forced labour and child labour was used at any step in the production of goods in Canada or elsewhere or of goods imported into Canada.

This Report has been prepared and filed pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**").

2. Steps Taken During the Reporting Period to Prevent and Reduce Risks of Forced Labour and Child Labour

VIAVI engages in the following to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by VIAVI or of goods imported into Canada:

- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Monitoring suppliers
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

More specifically, VIAVI is an affiliate member of the Responsible Business Alliance (RBA). More information about the RBA can be found at: <https://www.responsiblebusiness.org/about/members/>

VIAVI utilizes the RBA Code of Conduct (“CoC”) document to frame and communicate its compliance expectations with supply chain partners. On an annual basis at minimum, VIAVI documents and confirms the proportion of its tier one (direct) suppliers (COGS material spend) has stated compliance to the CoC via either:

- Membership in the RBA
- Self-Audit to the RBA CoC (as per RBA Template)
- Third Party (VAP) audit to the RBA CoC

Additionally, VIAVI periodically exercises the company risk assessment tool provided through the RBA to assess current supply chain risk for VIAVI’s direct suppliers.

3. Structure, Activities and Supply Chains

Structure: VIAVI US is a Delaware corporation with an IRS Employer Identification Number of 94-257968300. VIAVI Canada is a subsidiary of VIAVI US and has a Canadian tax ID number of 808540793RM0001.

Activities: VIAVI US is a technology company headquartered in Chandler, Arizona that manufactures communications testing and monitoring equipment for networks. VIAVI Canada is located in Ottawa, Ontario and primarily houses a research and development center in addition to various departments. VIAVI produces goods outside of Canada; sells them both in and out of Canada; and imports goods produced outside of Canada into Canada.

Supply Chains: VIAVI operates a global hybrid supply chain model that consists of both company-owned manufacturing sites, contract manufacturers and multiple key suppliers dispersed throughout the world. Strategic VIAVI factory sites include sites in Wichita, Kansas, USA; Stevenage, UK; Ste-Etienne France; and Eningen, Germany. Additionally, VIAVI has engaged with strategic Contract Manufacturers (CMs) and have product built in and fulfilled from sites in China, Mexico, Thailand and the United Kingdom.

4. Policies and Due Diligence Processes

VIAVI has policies and due diligence processes in place related to forced labour and/or child labour which incorporate responsible business conduct and identify and assess adverse impacts in operations, supply chains and business relationships.

More specifically, the terms and conditions to which all of VIAVI’s suppliers and contract manufacturers are bound require that they "shall comply with all legal regulations, ordinances, decrees, orders, laws, and other rules and regulations, including without limitation all rules, regulations and provisions relevant to health, safety, human rights, labour, ethics, and the environment. “All new suppliers and contract manufacturers are required to provide a certification and all suppliers and contract manufacturers are required to provide VIAVI with written documentation of ongoing compliance upon request. Any indications of slavery or human trafficking would be swiftly investigated. In addition, our Partner Code of Business Conduct prohibits our partners from supporting or using "any forms of forced, compulsory or child labour."

5. Forced Labour and Child Labour Risks and Steps Taken to Assess and Manage These Risks

VIAVI has started the process of identifying risks, but there are still gaps in our assessments. These risks are related to:

- The types of products VIAVI produces, purchases or distributes
- The locations of its activities, operations or factories
- The raw materials or commodities used in its supply chains
- Tier 1 (direct) suppliers
- The use of outsourced, contracted, or subcontracted labour
- The use of migrant labour

While VIAVI has used the RBA Risk Assessment Tool to probe its direct supplier risks within the manufacturing sector, those risks are believed to be minimal. Additionally, VIAVI has periodic on-site presence at all Tier 1 suppliers and has no evidence of material risk of forced or child labor. As VIAVI works exclusively with Tier 1 suppliers whom we know to comply with the RBA CoC, we believe that the risk in our immediate supply chain is low. Were a risk to exist, it is likely that this risk would be several levels down in our supply chain (i.e. suppliers of suppliers) and extremely challenging and costly to monitor.

6. Remediation Measures

VIAVI has not taken measures to remediate any forced labour or child labour in its activities and supply chains because such issues have not yet been identified.

7. Remediation of Loss of Income to the Most Vulnerable Families

VIAVI has not taken measures to remediate the loss of income to the most vulnerable families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains because such issues have not yet been identified.

8. Training

VIAVI's Code of Business Conduct, which sets forth the standards by which all VIAVI employees are expected to adhere, is available in six languages. VIAVI conducts training for all employees to emphasize the importance of acting in accordance with our Code of Business of Conduct. The training includes a variety of topics related to ethical conduct, including awareness of human trafficking and child labour issues. Additionally, all employees are required to re-certify their compliance with the Code of Business Conduct biennially and, in alternate biennial years, required to re-take the training. Members of the legal team also incorporate guidance regarding slavery and human trafficking into training sessions for Channel Partners.

9. Assessing the Effectiveness in Ensuring that Forced Labour and Child Labour are not Being Used in Entity’s Business and Supply Chain

VIAVI has policies and procedures in place to assess the effectiveness in addressing forced labour and child labour. VIAVI has a right at any time to audit suppliers for compliance against our terms and conditions but does not generally conduct audits unless we have a reason to suspect a problem exists. Our whistleblower hotline enables employees and others to confidentially lodge any concerns about the actions of partners, managers, employees or suppliers with respect to human rights violations or other violations of the Code of Business Conduct. As part of our commitment to continuous improvement, we are reviewing methods to perform additional diligence as part of our supplier qualification process to help ensure no VIAVI supplier engages or participates in slavery or human trafficking.

For more information about VIAVI’s compliance policies, please see our:

- Global Human and Labor Rights Policy available online at <https://www.viavisolutions.com/en-us/resources/literature-library>
- Slavery and Human Trafficking Statement available online at <https://www.viavisolutions.com/en-us/corporate/legal/compliance>

10. Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the Reporting Period listed above.

Date: **May 29, 2024**

By:  _____

Name: Richard E. Belluzzo

Title: Chairman of the Board of Directors of VIAVI Solutions Inc.

I have authority to bind the corporation.

The Report was approved by the Board of Directors of **VIAVI Solutions Inc.** on May 29, 2024.