

# Disclosure for the Prevention of Child Labor and Forced Labor of Any Form

The [California Transparency in Supply Chains Act \(SB 657\)](#), the [UK Modern Slavery Act \(MSA 2015\)](#), and Canada's [Fighting Against Forced Labour and Child Labour in Supply Chains Act \(S-211\)](#) address issues of child labor, slavery, servitude, forced or compulsory labor and human trafficking. These acts were designed to address the role of business, like Lumentum, in preventing child labor and modern slavery from occurring in their supply chains. Lumentum is committed to ensuring there is transparency in its own business and in its approach to tackling child labor and modern slavery throughout its supply chain, consistent with its disclosure obligations under SB 657, MSA 2015, and S-211.

Lumentum is a market and technology leading designer and manufacturer of innovative optical and photonic products enabling optical networking and laser applications worldwide. Lumentum optical components and subsystems are part of virtually every type of telecom, enterprise, and data center network. Lumentum lasers enable advanced manufacturing techniques and diverse applications including next-generation 3D sensing capabilities. Lumentum is headquartered in San Jose, California with R&D, manufacturing, and sales offices worldwide.

Our manufacturing operations, consisting of wafer fabrication and assembly, are areas within our direct control and where we seek continuous improvement in everything we do. We work with suppliers and contract manufacturers to procure the materials and products to our specifications. Our relationships with our vendors are critical to ensure product quality and to promote ethical and responsible sourcing throughout our supply chain.

Lumentum supports human rights globally both in our own facilities and in our supply chain. We strictly prohibit child labor, slavery or human trafficking of any kind and are committed to reducing the risk within our supply chain. Lumentum is a member of the Responsible Business Alliance (RBA), and we subscribe to the [RBA Code of Conduct](#), supporting principles in human rights and labor, specifically the elimination of all forms of child, forced and compulsory labor. In addition, Lumentum has a [Corporate Social Responsibility Policy](#) that supports the principles established under the United Nations Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

Lumentum expects the same high standards from all its contractors, suppliers, and other business partners, and as part of its contracting processes, Lumentum includes specific prohibition against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children.

1. Due Diligence and Verification: Lumentum conducts human rights due diligence, including assessing and addressing child or forced labor risks, through compliance to the RBA Code of Conduct. The RBA Code of Conduct, Section A1 "Prohibition of Forced Labor", states that "Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted." In addition, Section A2, "Young

Workers”, states “Child labor shall not be used in any stage of manufacturing.” In FY25, we completed site specific labor and ethics risk assessments at each manufacturing site to identify and mitigate potential risks of adverse labor and ethics impacts. We addressed identified gaps with targeted corrective measures and ensured continuous improvement in alignment with our commitment to responsible business and respect for human rights.

While forced or child labor are unlikely within Lumentum direct operations, our global footprint and the breadth of our supply chain creates potential exposure to such risks. For example, in response to U.S. Uyghur Forced Labor Prevention Act (UFLPA), we continuously monitor our supply chain to ensure that no suppliers operate in the Xinjiang Uyghur Autonomous Region (XUAR) in China. We keep up to date with the U.S.

Department of Homeland Security’s UFLPA Strategy to Prevent the Importation of Goods Mined, Produced, or Manufactured with Forced Labor in the People’s Republic of China to ensure that we do not do business with any prohibited entities. As part of supplier onboarding process, in-scope suppliers must attest that they actively ensure compliance with all forced labor regulations and applicable laws and regulations for activities related to the Lumentum supply chain. This includes ensuring compliance with UFLPA, confirming that they do not source from the XUAR or prohibited suppliers, and verifying and that their suppliers also meet these requirements. Lumentum has implemented several tools to identify, mitigate and address human rights risks, including child and forced labor.

- a. Risk Assessments of Suppliers: We complete annual risk assessments of our supply chain using RBA’s tools and approach. We evaluate our direct and indirect suppliers to the RBA Code of Conduct which covers five categories: labor and human rights, environment, health and safety, ethics and the management systems that support these topic areas. Forced and child labor are under the “labor and human rights” category.

For our supplier risk assessments, we conduct two levels of assessment. The first level assessment includes an evaluation of our top 200 suppliers by spend and considers geographical locations, spend level, industry, and international indices such as the Global Slavery Index from the Walk Free Foundation and the Trafficking in Persons Report Index from the U.S. Department of State.

The second level assessment is based on a detailed Self-Assessment Questionnaire (SAQ) that evaluates suppliers’ compliance with the RBA Code at their corporate and manufacturing sites. This assessment covers all major suppliers and any supplier that was rated high risk in the first level assessment. For any identified high-risk areas, we work with our suppliers on corrective actions to close the gaps.

- b. Performance Monitoring via Supplier Scorecards: Select suppliers undergo Supplier Business Reviews on a quarterly or semi-annual basis. Social Responsibility metrics are integrated alongside other business metrics. Suppliers are scored on factors such as completion of the RBA self-assessment questionnaire (SAQ), and their SAQ risk profile rating. Our Contract Manufacturers’ CSR performance is also evaluated on a quarterly basis, and we

rate them based on their RBA audit scores, corrective action plan closure performance, and improvement over time.

- c. Third Party Audits: Lumentum's Contract Manufacturers and select direct and indirect suppliers are required to undergo third-party audits to evaluate their conformance to the RBA Code of Conduct. For more details, see section #2.
2. Supplier Audits: Lumentum's Contract Manufacturers are required to undergo third-party audits to evaluate their conformance to the RBA Code of Conduct. They are planned, third-party audits and are required every two years. We work with our Contract Manufacturers on corrective actions to close all identified non-conformances, and require third-party verification audits to confirm closure of findings. Also, onsite subcontractors and service providers at our manufacturing sites are included in the scope of our internal audits. Select high-risk direct and indirect suppliers are also required to conduct third party audits. If findings are identified, we work closely with the supplier to ensure remediation is achieved. In FY25, audits confirmed that no instances of forced or child labor were identified. However, in some supplier audits, recruitment fees charged to workers were found, a practice that is a risk factor for forced labor. In line with our zero-tolerance policy on forced and bonded labor, we required the suppliers to immediately cease the practice and implement corrective action plans, which included steps such as reimbursing impacted workers and addressing underlying root causes.
3. Certification: In-scope suppliers are required to sign Lumentum's [Supplier Code of Conduct](#), unless Lumentum accepts the Supplier's own Code of Conduct, committing to compliance with labor laws, regulations and prohibition of child, forced or slave labor. We also require in-scope suppliers to acknowledge our supplier expectations regarding modern slavery and forced labor, and to commit to conducting due diligence on their own supply chain.
4. Internal Accountability: Lumentum's [Code of Business Conduct](#) outlines the broad principles of legal and ethical business conduct embraced by Lumentum as part of our commitment to integrity. Lumentum expects that all directors, employees, agents and contractors will act in a manner that complies both with the letter and the spirit of the Code. We provide multiple mechanisms for reporting concerns, including anonymous reporting. As part of evaluating our own compliance, all our manufacturing sites complete annual RBA self-assessment questionnaires to help identify risk, including labor risks. Our internal manufacturing sites also undergo internal or external RBA, or equivalent, audits on an annual basis.
5. Training: All employees, including on-site contingent workers, are trained on the RBA Code of Conduct, which includes sections on child and forced labor. Each year we implement an annual refresher training session for all employees and certain contingent workers with a focus on a different RBA topic, such as human rights and recognizing forced labor. We track to 100% completion of the training. Lumentum employees are also required to complete training on Lumentum's Code of Business Conduct on an annual basis. In addition, our Supply Chain staff receive specialized training annually on the requirements, risks, and red flags related to human rights, including child labor and modern slavery.

We require key management staff of our Contract Manufacturers to complete RBA Code of Conduct training to ensure the Code requirements are understood and implemented within their facilities. They are also required to complete refresher trainings annually covering different RBA topics.

To report any violations or suspected violations, we provide confidential and anonymous whistleblowing hotlines available in the local languages where we operate. These are found in Annex A of our [Code of Business Conduct](#) and [Supplier Code of Conduct](#).

These policies and actions serve as the foundation of our program to monitor risks related to child labor and modern slavery. We measure progress through our audit program, which is set at a regular cadence, and serves as the mechanism to identify issues. We work with the sites to establish corrective actions, we monitor closure, and require onsite visits to confirm closure of all identified findings.

Our commitment to the RBA Code of Conduct is a cornerstone of our efforts to safeguard our operations and supply chain against any form of child, forced, bonded or slave labor.

The Board of Directors has approved this statement on November 19<sup>th</sup>, 2025.

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 reporting year listed below.

Full name: Michael Hurlston  
Title: President and Chief Executive Officer  
Date: December 4, 2025

Signature:   
*I have the authority to bind Lumentum Holdings Inc.*

Lumentum 2025 fiscal year end: June 28<sup>th</sup>, 2025