

Lumentum Holdings Inc., including its subsidiaries and affiliates (collectively, "Lumentum" or the "Company") conducts its business affairs with uncompromising integrity. This is the responsibility of every member of the Lumentum community including our board of directors, executives, managers, employees, consultants and business partners. Conducting our business with uncompromising integrity means acting ethically and complying with all applicable laws and regulations of the countries in which Lumentum does business or business is being conducted on behalf of Lumentum. In keeping with Lumentum's commitment to uncompromising integrity, Lumentum expects that all Suppliers act and conduct business in a manner that complies both with the letter and spirit of this Supplier Code of Conduct ("Code").

AVOIDING CONFLICTS OF INTEREST

A conflict of interest can arise any time a Supplier's financial, other commercial, or personal relationships may inappropriately influence the Supplier's ability to fairly and accurately sell products and/or provide services to Lumentum. While it is not possible to list every conceivable conflict of interest that may arise in a Supplier's course of conducting business with or on behalf of Lumentum, the following is an overview of the more common conflicts of interest Suppliers may encounter and is a set of guidelines for all Suppliers to follow.

Relationships

If a Supplier or someone with whom the Supplier has a close relationship (an immediate family member or close companion of an employee of a Supplier), has a financial, employment, or other relationship with Lumentum or a Lumentum competitor, customer, service provider or other business partner of Lumentum, that relationship may create a conflict of interest. Lumentum employees are prohibited from: (i) holding any material financial interest, including stock or bond ownership, or any other direct financial relationship, in any outside concern or with someone with whom the Supplier has a close relationship, and (ii) engaging in activities with third parties with whom the Supplier has a close relationship that might interfere with their ability to devote their full attention to the business activities of Lumentum. Suppliers should disclose all such relationships to Lumentum as soon as they become aware of such so that Lumentum may ensure actual conflicts of interest are avoided.

Gifts

Providing gifts, both tangible and in the form of entertainment and meals can create conflicts of interest and may be prohibited by applicable law. Lumentum employees must comply with Lumentum's Code of Business Conduct and other related Lumentum policies, which strictly control when and under what circumstances Lumentum employees may accept personal gifts or entertainment from existing or potential competitors, customers, suppliers, service providers or business partners. In general, Supplier may not provide gifts, including entertainment and services, to Lumentum employees unless such gifts are (a) of nominal value; or (b) customary and reasonable meals and entertainment at which the giver is present.

Suppliers must exercise extreme caution when considering whether to provide gifts to end customers of Lumentum. Like Lumentum, many end customers have

policies regulating when and under what circumstances their employees may accept gifts from suppliers in order to prevent conflicts of interest. Lumentum expects all Suppliers to comply with end customer internal policies pertaining to gifts. With this in mind, gifts may be given to end customers or end customer employees only when permitted by end customer internal policies and only if they are (a) of nominal value; or (b) customary and reasonable meals and entertainment at which the giver is present.

Additionally, most countries have laws and regulations restricting gifts that may be given to government employees, including employees of government-owned or partially government-owned entities. For example, the United States Foreign Corrupt Practices Act ("FCPA") provides for severe penalties for companies and individuals who engage in direct or indirect bribery of government officials. Absolutely no gifts of any kind may be offered to any U.S. government employee, including employees of government-owned or partially government-owned entities. U.S. government employees include all employees of government agencies and units in the U.S., whether federal, state or local. Many countries have similar anti-corruption laws and extend anti-bribery restrictions to the private sector. Lumentum expects all Suppliers to strictly abide by all such laws and regulations.

Likewise, no gifts or anything of value may be offered to any private company corporate officer, director or employee, consultant or its representative, for the purpose of obtaining or retaining business or as an inducement or reward for favorable action or forbearance from action or the exercise of influence. Suppliers may only offer gifts when permitted by applicable laws, including the FCPA, and such gifts (a) are of nominal value; or (b) are customary and reasonable meals and entertainment at which the giver is present.

Bribes and Kickbacks

Bribes or other means of obtaining undue or improper advantage shall not be offered or accepted by Suppliers. This includes, but is not limited to, bribes or other inducements given for the purposes of:

- influencing a customer decision
- obtaining an improper advantage over a competitor for a contract or order
- changing the specifications of a third party's request for proposal to benefit Lumentum or position Lumentum products
- obtaining confidential or other restricted information
- obtaining discounts or other financial benefits from Lumentum

The use of bribes, secret compensation or kickbacks is improper and may result in immediate termination of the Supplier's relationship with Lumentum, and appropriate legal action.

ENGAGING IN FAIR, HONEST AND ACCURATE BUSINESS PRACTICES

Fair Competition

Lumentum seeks to outperform its competition fairly and honestly and seeks competitive advantages through superior performance and service to its customers, not unethical or illegal business practices. Suppliers always should

deal fairly and honestly with their customers, suppliers, and competitors. Lumentum strictly prohibits any and all forms of corruption, extortion, and embezzlement. Suppliers must not take unfair advantage of Lumentum or anyone else through abuse of privileged or proprietary information, misrepresentation of material facts or any other unfair or dishonest practices.

Supplier shall not enter into any agreement, understanding, or plan (written or oral) with any of its competitors with regard to price, terms or conditions of sale, production, distribution, territories or customers, or exchange or discuss with any of its competitors pricing, marketing plans, manufacturing costs, or other competitive information. Supplier shall comply with all antitrust laws applicable to their business activities.

Lumentum products are sold based on the Company's reputation for superior products and service. All claims made about Lumentum products and competitors' products should be accurate and supportable. Marketing, sales and advertising activities must always be truthful. Lumentum does not permit advertising or promotions for its products and services to be false or misleading. Suppliers should not make a substantive claim about a Lumentum product or service, or a competitor's product or service that has not been properly substantiated. Similarly, Suppliers should notify Lumentum by email of any situation where a competitor may be attempting to mislead customers, or potential customers, about Lumentum products or services. Suppliers should report this immediately to Lumentum's ethics hotline if they become aware of any such dishonest or questionable business practices engaged in by Lumentum competitors.

Supporting Lumentum's Reputation and Image

Lumentum maintains an image of unwavering integrity and respect for others. The Company understands the importance of building good business relationships and that part of creating trust and confidence with customers, suppliers, and business partners involves some level of interaction. Lumentum asks that when engaging in social activities with Lumentum personnel, Suppliers do so in a tasteful and respectable manner.

Accuracy of Reports, Records and Accounts

All Supplier records and books of account shall at all times accurately reflect the true nature of the transactions they record.

Confidential Information and Intellectual Property Rights

Suppliers must maintain the confidentiality of information entrusted to them by Lumentum and its end customers and business partners, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information, including information that might be of use to competitors, or harmful to the Company or its customers and suppliers if disclosed. Suppliers must not disclose proprietary or confidential information about Lumentum or its employees, or confidential information about an end customer, supplier or business partner, to anyone who is not authorized to receive it, or has no need to know the information (even other Lumentum employees). The only exceptions to this standard are when such disclosure is authorized in writing by the owner of such confidential information, or by appropriate legal process (i.e. subpoena). If a Supplier is authorized and must disclose confidential information to a third party, they should ensure that appropriate protections, such as a non-disclosure agreement, have been put in place prior to the disclosure. Suppliers are to respect

Lumentum and other third party intellectual property rights at all times. Suppliers also are expected to comply with all applicable data privacy laws and regulations, including the EU General Data Protection Regulation (GDPR).

Insider Trading and Investments

Insider trading is prohibited by law and by Lumentum policy. Insider trading occurs when an individual with material, non-public information trades securities or communicates such information to others who trade on such information. The person who trades or “tips” information violates the law if he or she has a duty or relationship of trust and confidence not to use the information. Lumentum expects all Suppliers to strictly observe all applicable insider trading laws and regulations.

COMPLYING WITH LEGAL AND REGULATORY STANDARDS

Suppliers and their employees are required to strictly observe all applicable laws and regulations. Violations of law by even one Supplier can harm Lumentum’s reputation and ability to carry on business. Suppliers should require that all their employees are familiar with the basic legal requirements that pertain to their duties and responsibilities.

Antitrust Compliance

In many countries, companies are subject to complex laws and regulations (known in some countries as “antitrust” laws) designed to preserve competition among enterprises and to protect consumers from unfair business arrangements and practices. Suppliers are expected to comply with these laws at all times.

Tied Business Dealings

“Tying” arrangements, whereby customers are required to purchase or provide one product or service as a condition for another being made available, are unlawful in certain instances. Suppliers should understand and comply with the “tying” regulations in their jurisdiction.

Anti-boycott Laws

United States laws, and the laws of many other countries, prohibit persons from taking actions or entering into agreements that have the effect of furthering any unsanctioned boycott of a country. Lumentum Suppliers are required to comply with all anti-boycott laws applicable in their jurisdiction.

Embargoes and Sanctions

Lumentum complies fully with international economic sanctions and embargoes restricting persons, corporations and foreign subsidiaries from doing business with certain countries, groups and individuals. Economic sanctions prohibit or restrict doing business with targeted governments and organizations, as well as individuals and entities that act on their behalf. Sanction prohibitions also may restrict investment in a targeted country, as well as trading in certain goods, technology and services with a targeted country.

Lumentum Suppliers are required to comply with all economic sanctions and embargoes applicable in their jurisdiction.

RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT

The Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC), is the world's largest industry coalition dedicated to electronics supply chain responsibility. Lumentum is committed to the Responsible Business Alliance (RBA) Code of Conduct. Suppliers are expected to comply with the RBA Code of Conduct, which is made up of five sections: Labor, Health and Safety, Environment, Ethics and Management Systems. When differences arise between standards and legal requirements, the stricter standard shall apply.

Upon request by Lumentum, Suppliers will be required to submit an annual RBA Self-Assessment Questionnaire (SAQ) and certain Suppliers will be required to complete an RBA audit. The full RBA Code of Conduct is found at: <http://www.responsiblebusiness.org/standards/code-of-conduct/>

COMPLYING WITH LABOR LAWS, RULES, REGULATIONS AND STANDARDS

Suppliers are expected to comply with all applicable labor laws, rules and regulations with respect to their employees and contractors (collectively, "personnel"). Suppliers must not support or use any form of forced, bonded, slave, trafficked or child labor. Supplier personnel shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment and must be provided with a written employment agreement in their native language. Suppliers may not hold or deny access to identity or immigration documents of their personnel. Suppliers must be committed to a workplace free of inhumane treatment, including harassment of any kind and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring or other employment practices such as wages, promotions, rewards, and access to training or other growth opportunities.

Compensation paid to Supplier's personnel shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. The RBA Code of Conduct sets limitations on working hours for direct or indirect personnel dedicated to the production of a good or delivery of a service. Working hours are not to exceed the maximum set by local law. Further, a workweek may not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Supplier personnel shall be allowed at least one day off every seven days.

Open communication and direct engagement between personnel and management are the most effective ways to resolve workplace issues. Suppliers should respect the rights of personnel to associate freely. Suppliers' personnel shall be able to communicate openly with management regarding working conditions without fear of retaliation, intimidation or harassment.

ENVIRONMENT, HEALTH AND SAFETY (EHS)

Lumentum is committed to protecting the environment and the health and safety of our personnel, our business partners and the public. We ensure our compliance with applicable regulations and embed EHS into our business processes. We strive to identify and eliminate negative environmental impacts associated with our operations and products throughout their lifecycle. We commit to continuous improvement of our EHS management systems and performance.

Lumentum Suppliers must comply with all applicable environmental, health and safety laws and regulations including those requirements in the RBA Code of Conduct. Suppliers must have EHS policies and processes in place to demonstrate a commitment to safe and environmentally-responsible operations, services and management. This includes procedures and systems to identify, prevent, manage, and track environmental and health and safety hazards including maintenance of emergency response plans. Suppliers must have EHS audit programs to periodically assess their prevention plans and measures, facilities and operations for compliance and effectiveness.

Lumentum expects Suppliers to maintain compliant EHS systems and provide a satisfactory record of compliance with laws and regulations in the conduct of their business. In case of non-compliance, the Supplier must take immediate corrective actions to ensure continuity of supply to Lumentum. If a Supplier fails to implement the corrective action in a timely manner, Lumentum may terminate the business relationship.

Suppliers must provide personnel with a safe and healthy workplace and have processes to identify, evaluate and control workplace exposures to chemical, biological and physical agents to prevent illness and injury. An EHS training program for new and existing personnel must be in place to provide appropriate workplace health and safety information and training in a language such personnel can understand for all identified workplace hazards. The training program must also include emergency response for fires, medical emergencies, weather/natural disasters, spills and air releases.

Material Restrictions and Conflict Minerals

Suppliers must comply with all applicable laws, regulations and requirements regarding the prohibition of specific substances in products and manufacturing, including without limitation, the restrictions on materials set forth in the EU Parliament and the Council Directive 2011/65/EC (RoHS), Commission delegated Directive (EU) 2015/863, their amendments and other country-specific RoHS requirements, and the restriction and notification of substances set forth in EU Regulation EC 1907/2006 (REACH) and the procurement of minerals from areas of conflict. If required by Lumentum, documentation to demonstrate compliance to the substance restrictions must be made available by Suppliers without any extra charges.

Lumentum is committed to complying with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as the applicable requirements of Section 1502 of the Dodd-Frank Act, which aims to prevent the use of minerals that directly or indirectly finance or

benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries (“conflict minerals”).

Lumentum Suppliers are required to commit to being or becoming “conflict-free” (which means that such Supplier does not source conflict minerals) and sourcing tin, tantalum, tungsten and gold only from smelters conformant with the Responsible Minerals Assurance Process (RMAP) assessment protocols.

SECURITY REQUIREMENTS

Suppliers are required to maintain a security program, which is supported by Supplier’s executive management and must cover, at a minimum, the following:

- The protection of Lumentum confidential information against unauthorized disclosure, loss or misuse.
- A security incident management and response plan for actual or suspected security compromises with respect to Lumentum’s confidential information or any operations providing services to Lumentum, and loss or misuse of Lumentum confidential information.
- Supplier must utilize personnel security controls to include pre-employment background checks that verifies personnel identification, employment and criminal history. Supplier must ensure that Supplier personnel surrender Lumentum confidential data and other Lumentum property upon request and removal from working on Lumentum-related activities.
- Supplier must have a physical security program for Supplier facilities and areas where Lumentum confidential data or Lumentum systems are stored. Access controls must be in place to prevent unauthorized entry to facilities, maintain control of personnel and visitors, and protect company assets. Access controls must include the positive identification of all personnel, visitors, and vendors at all points of entry.

Suppliers must ensure that its personnel or anyone under Supplier’s direct control that performs work for Lumentum is aware of and complies with these Security Requirements.

C-TPAT (Customs–Trade Partnership Against Terrorism)

International business partners and logistics providers play an important role in Lumentum’s continued success via the punctual shipment and delivery of components and materials. Lumentum expects Suppliers to meet the Customs - Trade Partnership Against Terrorism (C-TPAT) minimum security criteria so that all parties enjoy the benefits of a secure supply chain. Security procedures should be documented, communicated to personnel and periodic audits occur as needed. C-TPAT is voluntary but Lumentum requires Suppliers enrolled in the program to provide their status verification interface (SVI) number for recordkeeping purposes.

RAISING AND REPORTING CONCERNS

Any Supplier or any personnel of a Supplier which suspects or has a concern regarding a possible violation of this Code by any person or party, or of any

violation by a Lumentum employee or contractor of Lumentum's Code of Business Conduct, should bring its concerns to the attention of:

- **General Counsel**

Lumentum Legal Department
1001 Ridder Park Drive
San Jose, CA 95035 Tel: (408) 546-5483
LumentumLegal@Lumentum.com

Ethics Hotline Service

In addition to the contact above, concerns may be reported anonymously through the Lumentum ethics hotline which is managed by a third party provider, EthicsPoint. The telephone numbers are listed in **Annex A**.

Lumentum will not retaliate or threaten to retaliate against any Supplier who in good faith reports concerns or a possible violation of this Code or who participates in or cooperates with any investigation by the Company or any law enforcement agency, whether or not it is determined that an actual violation has occurred. Reports will be kept as confidential as possible under the circumstances presented and the Company's obligations under applicable law.

CONCLUSION

Lumentum's intent is to operate within the highest standards of ethics and integrity. This Code was developed to articulate and reinforce these values and to ensure that they are clear to all Lumentum Suppliers. The Company appreciates each Supplier's commitment to apply these ethical standards and behaviors in all its dealings with and on behalf of Lumentum, and trusts that all Suppliers will consistently reinforce the Company's reputation for uncompromising integrity.

ANNEX A
EthicsPoint Hotline Numbers

Location	International Toll-Free Service Number
USA	844-498-1267
Canada	844-498-1267
China	400-9-901-445
Japan	0120-944-645
Taiwan	8445922214
Thailand	800-011-790
Slovenia	844-851-2198
Switzerland	0800-000-829
All Other International Sites	470-219-7133

Please sign the acknowledgement below and return a copy of the signed document to your Lumentum representative.

By signing this acknowledgement, I hereby certify that:

1. We understand and agree that we will conduct our business in conformity with the standards set forth in Lumentum's Supplier Code of Conduct, and
2. We acknowledge that the failure to comply with Lumentum's Supplier Code of Conduct may result in our termination as a qualified supplier to Lumentum.

Company Name

Signature

Date

Name

Title