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# Disclosure for the UK Modern Slavery Act and California Transparency in Supply Chains Act

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The [California Transparency in Supply Chains Act \(SB 657\)](#) and the [UK Modern Slavery Act \(MSA 2015\)](#) both address issues of slavery, servitude, forced or compulsory labor and human trafficking. These acts were designed to address the role of business, like Lumentum, in preventing 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 modern slavery throughout its supply chain, consistent with its disclosure obligations under SB 657 and MSA 2015.

Lumentum supports human rights globally both in our own facilities and in our supply chain. We strictly prohibit 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 forced and compulsory labor. In addition, Lumentum has a [Corporate Social Responsibility Policy](#) that includes support of 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, 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. Verification: The steps we have taken to evaluate and address forced labor risks are through compliance to the RBA Code of Conduct. The RBA Code of Conduct, section A1 “Freely Chosen Employment”, states that “Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used.”
  - a. Risk Assessments of Suppliers: Evaluation of labor and human rights risks through RBA tools such as a risk assessment platform and RBA Self-Assessment Questionnaire (SAQ)
  - b. Performance Monitoring via Supplier Scorecards: Social Responsibility metrics are integrated alongside other metrics
  - c. Third Party Audits: Lumentum’s Contract Manufacturers are required to undergo third-party audits to evaluate their conformance to the RBA Code of Conduct.
2. Supplier Audits: Lumentum’s Contract Manufacturers are required to undergo third-party audits to evaluate their conformance to the RBA Code of Conduct. The third-party audits are required every 2 years, with verification audits confirming closure of identified findings in between. Onsite subcontractors and service providers are included in the scope of our internal audits.

3. Certification: 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 forced or slave labor.
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, we conduct internal RBA audits on an annual basis.
5. Training: Lumentum employees are required to complete training on Lumentum's Code of Business Conduct on an annual basis. In addition, during a supplier conference there is training to suppliers and supply chain staff on compliance to the RBA Code and risks in the supply chain, including modern day slavery. There has also been specialized training delivered to Supplier Quality Engineers on risks and red flags to be aware of during their supplier visits.

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

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