

Statement Against Modern Slavery and Human Trafficking



Introduction

VIAVI is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor, child labor, and all other trafficking-related activities (collectively, “modern slavery and human trafficking”). We realize that being a responsible global citizen is about more than just complying with local regulations. It's about how we do business, and how our organization's activities affect the people and communities where we live and work. From assessing and continually reducing our environmental impact, to ensuring clean and safe working conditions for our employees and suppliers, VIAVI takes our responsibility to the global community seriously.

The United Kingdom's *Modern Slavery Act 2015*, the *California Transparency in Supply Chains Act of 2010*, and Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* (collectively, the “Acts”) require businesses to disclose information relating to the steps that they have undertaken to ensure that modern slavery and human trafficking are not taking place in their business or supply chains. The following statement of VIAVI Solutions Inc. and its covered subsidiaries¹ (collectively, “VIAVI”) responds to these requirements for the financial reporting year ending June 28, 2025 (the “Reporting Period”).

VIAVI's Business and Supply Chains

VIAVI is a global provider of network test, monitoring and assurance solutions for telecommunications, cloud, enterprises, first responders, military, aerospace and railway, VIAVI is also a leader in light management technologies for 3D sensing, anti-counterfeiting, consumer electronics, industrial, automotive, government and aerospace

¹ VIAVI Solutions Inc. has adopted the policies and processes related to modern slavery and human trafficking risks as further described in this statement. VIAVI Solutions Inc. therefore provides this statement for itself and on behalf of certain foreign subsidiaries that are directly covered by a disclosure obligation in their respective jurisdictions. Currently this includes VIAVI Solutions UK Limited and its subsidiaries Aeroflex Ltd., Comtest Wireless International Limited, Comtest Wireless Limited, and VIAVI Solutions Pension Trustee UK Limited pursuant to Section 54, Part 6 of the UK Modern Slavery Act 2015, and VIAVI Solutions Canada ULC (Canadian tax ID number 808540793RM0001) pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023. Through this statement, VIAVI also satisfies its obligations pursuant to the California Transparency in Supply Chains Act of 2010. A complete list of VIAVI Solutions Inc.'s subsidiaries as of the end of its most recently completed fiscal year can be found in VIAVI's Form 10-K, filed with the US Securities and Exchange Commission on August 16, 2024.

applications. In 2023, we celebrated over 100 years of Network Transformation and Optical Innovation.

VIAVI Solutions Inc. (IRS Employer Identification Number of 94-257968300) is a corporation incorporated in the state of Delaware, with its headquarters in Chandler, Arizona. VIAVI has approximately 3,600 employees working in over 30 countries around the world, including Canada and the United Kingdom.

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. We use suppliers and contract manufacturers around the world to supply parts and components for the manufacture and support of our products.

Steps to Prevent and Reduce Risks of Modern Slavery and Human Trafficking

VIAVI engages in the following to prevent and reduce the risk that modern slavery or human trafficking is used at any step of the production or importation of goods by VIAVI:

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

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 1 (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.

Risks of Modern Slavery and Human Trafficking

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 VIAVI's activities, operations or factories
- The raw materials or commodities used in VIAVI's supply chains
- Tier 1 (direct) suppliers
- The use of outsourced, contracted, or subcontracted labor
- The use of migrant labor

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 modern slavery or human trafficking. 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 to directly monitor.

Organizational Policies

VIAVI has policies and due diligence processes in place related to modern slavery and human trafficking which incorporate responsible business conduct and identify and assess adverse impacts in operations, supply chains and business relationships. We comply with the laws regarding modern slavery and human trafficking in countries in which we do business and require that our suppliers and contract manufacturers do the same. Specifically, the terms and conditions to which all of our 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."

As previously noted, VIAVI is an affiliate member of the Responsible Business Alliance and has adopted the RBA's Code of Conduct which prohibits the use of forced labour. VIAVI's internal policies and practices, including the Global Human and Labour Rights Policy and our Code of Business Conduct implement the Responsible Business Alliance Code, further communicate our commitment to ethics and uncompromising integrity.

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. All employees receive the training biennially and, in alternative years, are required to re-certify their compliance with the Code of Business Conduct. Members of the legal team also incorporate guidance regarding modern slavery and human trafficking into training sessions for Channel Partners.

Audits & Accountability

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.

Due Diligence & Remediation Processes

As discussed above, our standards, including our prohibition on the use of modern slavery and human trafficking in our supply chain, are communicated to our prospective suppliers and contract manufacturers as part of our terms and conditions and through our 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.

At this time, VIAVI has not taken measures to remediate (i) modern slavery or human trafficking in its activities and supply chains or (ii) the corresponding loss of income to the most vulnerable families that results from measures taken to eliminate modern slavery or human trafficking because such issues have not yet been identified.

Board of Director Approval and Attestation

In accordance with the requirements of the Acts, 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 Acts, for the Reporting Period listed above.

By: 

Name: Richard Belluzzo, Chair

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

I have authority to bind the corporation.

This Statement was approved by the Board of Directors of VIAVI Solutions Inc. on May 13, 2025, who will review and update it annually.