Ciena Corporation (together with its worldwide subsidiaries, “Ciena”) is committed to acting ethically and with integrity in all of its business dealings. This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015, and sets out the steps that Ciena has taken and is continuing to take to ensure that modern slavery and human trafficking is not taking place within our supply chain or in any part of our business.

OUR BUSINESS

Ciena is a network strategy and technology company focused on providing solutions that enable a wide range of network operators to adopt next-generation communication architectures. We provide equipment, software and services that support the transport, switching, aggregation, service delivery and management of voice, video and data traffic on communications networks. Our high-capacity hardware platforms and network management and control software solutions enable open, multi-vendor, programmable networks that improve automation, reduce network complexity and flexibly support changing service requirements. Our solutions yield business and operational value for our customers by enabling them to support new applications, introduce new revenue-generating services and reduce network complexity and expense.

Ciena is headquartered in Hanover, Maryland, USA. As of October 31, 2016, we had a global workforce of 5,555 employees.

We maintain a direct sales presence organized geographically around the following markets: (i) United States and Canada; (ii) Caribbean and Latin America; (iii) Europe, Middle East and Africa; and (iv) Asia-Pacific. We also maintain a global channel program that works with resellers, systems integrators, service providers and other third party distributors who market and sell our products and services.

Ciena uses a global sourcing strategy relying on upon third party contract manufacturers to manufacture, ship and support our products. Our manufacturers procure components necessary for assembly and manufacture of our products based on our specifications, approved supplier lists, bills of materials, and testing and quality standards. We work closely with our manufacturers to manage material, quality, cost and delivery times, and we continually evaluate their services to ensure performance on a reliable and cost-effective basis. Our business, both for internal use and for use in the products we sell to our customers, utilizes more than 1,500 suppliers globally.
OUR POLICIES

Ciena maintains both a Corporate Social Responsibility Policy and a Code of Business Conduct and Ethics (“Code of Conduct”) that guide the conduct and behavior of our employees, officers and directors.

Under our Corporate Social Responsibility Policy, Ciena is committed to the principles laid out in the Responsible Business Alliance (formally known as the Electronics Industry Citizenship Coalition) Code of Conduct and the UN Global Compact.

Under our Code of Conduct, we offer equal employment and advancement opportunities to the most qualified individuals, regardless of race, color, religion, gender, age, national origin, disability, sexual orientation, veteran or marital status or any other category protected by applicable law. We do not tolerate any form of discrimination, and we make reasonable accommodations for employees with disabilities. Employees who violate Ciena’s Code of Conduct are subject to disciplinary action, up to and including termination of employment.

Our employees have a duty to report violations of Ciena’s Code of Conduct, and violations can be reported anonymously. Ciena prohibits retaliation in any form against any employee who, in good faith, reports a possible violation of our code of conduct or applicable law.

OUR DILIGENCE

Ciena has a rigorous supplier selection policy and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. Ciena conducts on-site audits of key suppliers, focused mainly on quality and capability, which include a review of operations and production facilities.

In 2015, Ciena’s key suppliers were assessed against the Responsible Business Alliance self-assessment questionnaire (SAQ), and all were identified as low risk. In 2016 we engaged Ecovadis to conduct a corporate social responsibility assessment of Ciena’s suppliers comprising, in aggregate, more than 80% of our spend on components and services used in the production of our products.

Ciena’s purchase order terms and conditions and our supplier guidelines, with which all of our suppliers are expected to comply, require our suppliers to adhere to the Responsible Business Alliance Code of Conduct and to the provisions of all applicable laws.

In order to facilitate continued vigilance, Ciena established an internal, cross-functional team to monitor and assess modern slavery concerns, with members from the Supply Chain Operations, Corporate Social Responsibility and Legal functions.
RISK AREAS

To ensure Ciena is proactive in the area of modern slavery, we have identified those aspects of our business and supply chain we believe are at the most risk in order to ensure they receive due attention. Those risk areas include circuit pack and product assembly, and sources of commodity components.

We maintain close relationships with the contract manufacturers responsible for our circuit pack and product assembly. In most cases we have employees physically co-located with the contract manufacturer to monitor and assess their operations and to ensure that Ciena quality standards are met.

Ciena does not have a direct relationship with the manufacturers of all of the commodity components used in our products. For these purchases, Ciena has a procedure to ensure that when contract manufacturers purchase components on Ciena’s behalf, the components are sourced directly from the manufacturer or its authorized distributor. Components are purchased from independent resellers only as authorized by Ciena.

OUR EFFECTIVENESS

To date, we have received no reports from employees, suppliers, the public, or law enforcement agencies to indicate that modern slavery practices have been identified in Ciena’s supply chain or in any aspect of its business.

In addition to conducting diligence for any indications of modern slavery within our business or supply chain, we have identified the following performance metrics that will be monitored going forward, in order to allow us to best gauge the effectiveness of the steps we are taking to ensure that slavery is not taking place within our business or supply chain:

- Number of personnel who have received training related to modern slavery on a cumulative basis;
- Results of assessments of Ciena’s supply chain conducted by Ecovadis; and
- Percentage of employees completing annual acknowledgement and certification of our Code of Business Conduct and Ethics.

TRAINING

We are taking steps to ensure that Ciena personnel are aware of the indicators and risks associated with modern slavery and human trafficking. All Ciena personnel have access through Ciena’s learning and training portal to training materials related to modern slavery. More than 80% of Ciena’s supply chain personnel who interface directly with suppliers have received training on ensuring that modern slavery and human trafficking are not taking place within our supply chain.
This Slavery and Human Trafficking Statement for Fiscal 2016 was approved by Ciena’s Board of Directors on February 22, 2017.

Gary B. Smith
President & Chief Executive Officer

March 2017