



Modern Slavery and Human Trafficking Statement Fiscal 2024

To comply with the following:

California's Transparency in Supply Chains Act of 2010, the United Kingdom's Modern Slavery Act of 2015, the Australian Modern Slavery Act of 2018, and the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act of 2024.

May 30, 2025

This statement is a joint statement (the “Joint Statement”) made under the Australia Modern Slavery Act 2018, Section 54(1) of the United Kingdom Modern Slavery Act 2015, the Canadian Fighting Against Force Labor and Child Labor in Supply Chains Act of 2024, and the California Transparency in Supply Chains Act of 2010 and constitutes the statement against modern slavery and human trafficking by Infinera Pty Ltd (Company Reg. Number: ACN 162 198 781), Infinera Limited (Company Reg. Number: 5242459), Infinera Canada Inc. (Company Reg. Number 3238160) and Infinera Corporation.

Organization's Structure

Originally founded in December 2000, Infinera Corporation (“Infinera”) entered into an Agreement and Plan of Merger with Nokia Corporation (“Nokia”) in June 2024. The transaction closed on February 28, 2025, with Infinera surviving as a wholly owned, indirect subsidiary of Nokia.

Prior to the transaction's close on February 28, 2025, Infinera was listed on the NASDAQ exchange as INFN.

Infinera is incorporated in the United States under the laws of Delaware, with headquarters in San Jose, California. Its operations include 86 subsidiaries worldwide (collectively referred to as “Infinera”) and offices in 48 locations worldwide.

As of December 31, 2024, Infinera had 3,418 employees worldwide, located in 40 countries. Infinera’s global reach brings a diverse, inclusive, global perspective to its operations. Approximately 1.5% of its workforce is based in Australia, 2.4% in the UK, and 4.3% in Canada.

Infinera strives to maintain a culture of compliance with all applicable laws and regulations and adhere to the highest standards of ethics and business conduct concerning slavery, servitude, forced or compulsory labor, and human trafficking in the supply chain. Infinera’s employees and human capital are its most valuable assets. Infinera engages its employee base to foster a productive and ethical workplace culture so it can compete successfully and sustainably in today’s marketplace.

Nokia Acquisition and Its Impact on the Joint Statement

On February 28, 2025, Nokia Corporation (“Nokia”) completed its acquisition of Infinera pursuant to the Agreement and Plan of Merger announced on June 27, 2024. At the close of the transaction on February 28, 2025, Infinera became part of the Nokia group, with Nokia holding 100% of its equity and voting rights. This Joint Statement is with respect to Infinera and its subsidiaries for fiscal 2024. For fiscal 2025 and beyond, the Infinera entities party to this Joint Statement will instead be covered by Nokia’s Modern Slavery Statement.

Operations

Infinera is a global supplier of innovative open optical networking solutions and advanced optical semiconductors that enable carriers, cloud operators, governments, and enterprises to scale network bandwidth, accelerate service innovation, and automate network operations. Infinera

solutions deliver industry-leading economics and performance in the long-haul, submarine, data center interconnect, and metro transport applications.

Infinera markets and sells its solutions globally through its direct sales and services organization and through many channel and reseller partners. In addition to entering into agreements with resellers, Infinera has several other types of sales and marketing-focused alliances with entities. Infinera's sales, services, and marketing professionals are based across the Americas, Europe, the Middle East, Africa, and Asia Pacific and focus on direct and channel sales, sales operations, professional services, and account management.

Annual Consolidated Revenue

For fiscal 2024, Infinera's consolidated revenue was approximately USD 1.4 billion.

Consultation Processes

Infinera has acted in consultation with entities that it owns or controls in preparing this Joint Statement.

Infinera's Supply Chains

During fiscal year 2024, Infinera engaged with 1,870 suppliers globally from sixty-six (66) countries. In Australia, Infinera engaged with fifty-nine (59) suppliers. In the UK, Infinera engaged with sixty-eight (68) suppliers. In Canada, Infinera engaged with sixty-four (64) suppliers.

Infinera's supply chains include the suppliers of equipment and components needed to build and maintain its solutions and manufacture its products. The leading suppliers of Infinera are based in Asia.

In addition, Infinera contracts with contract manufacturers ("CM") and suppliers that provide goods and services that relate chiefly to the provision of components and subsystems.

Infinera's major spending categories include direct materials, real estate, energy and utilities, facility maintenance and repairs, payroll services, professional services (including legal and accounting services), information technology and telecommunications, travel and entertainment, courier and delivery, public relations, and marketing.

Infinera's Policies on Slavery and Human Trafficking

Infinera has appropriate policies that underpin its commitment to ensure that there is no modern slavery or human trafficking in its supply chains or any part of its business. Infinera reviews and updates its policies as needed to ensure it follows best practices and requires its business partners, including suppliers, to do the same. These policies embody Infinera's corporate values and the international principles encompassed by:

- the Universal Declaration of Human Rights;
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work;
- the United Nations Guiding Principles on Business and Human Rights; and
- the United Nations Global Compact.

Infinera's Supplier Code of Conduct ("Supplier Code of Conduct") reflects its commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not occurring anywhere in its supply chains. The Supplier Code of Conduct sets out the minimum standards expected of all Infinera suppliers, so they act ethically, responsibly, and in compliance with applicable laws and regulations. At a minimum, it must be applied by Infinera suppliers to their first-tier suppliers and subcontractors, including contract labor providers.

Infinera's Code of Business Conduct and Ethics, which is reviewed and updated as needed, also has policies in place that address modern slavery concerns.

Due Diligence Processes for Slavery and Human Trafficking

Infinera has zero tolerance for slavery and human trafficking. To ensure all those in its supply chains comply with Infinera's values and ethics, Infinera has a rigorous supply chain compliance program in place. Failure to abide by the supply chain compliance program is grounds for disqualification of any supplier. The compliance program consists of:

Supplier Code of Conduct Compliance - Infinera requires its suppliers to conduct their business lawfully and comply with Infinera's high standards of integrity and ethics. The Supplier Code of Conduct governs Infinera's relationship with its CMs and suppliers.

Verification – Infinera conducts surveys and business reviews of its major CMs and suppliers to assess and evaluate their performance in terms of labor conditions, child labor, and human trafficking. Infinera considers these principles in selecting its CMs and suppliers. Infinera conducts third-party audits and verification as part of its onboarding process using Source Intelligence and Ecovadis.

Certification – Infinera suppliers must certify compliance with the Supplier Code of Conduct, which addresses human rights, forced labor, child labor, and other ethical standards.

Infinera also conducts due diligence on its channel partners and resellers to ensure that they conduct business in a manner that is consistent with Infinera's policies and values when they work on Infinera's behalf.

Infinera also has systems in place to:

- Identify and assess potential risk areas in its supply chains.
- Mitigate the risk of slavery and human trafficking in its supply chains.
- Monitor potential risk areas in its supply chains.
- Protect whistleblowers.

Internal Accountability

Infinera requires all employees and management, including those responsible for supply chain management, to comply with Infinera's Code of Business Conduct and Ethics and all applicable laws. Non-compliance with Infinera's standards may result in disciplinary or corrective action or termination. In addition, Infinera's Whistleblower Policy allows an employee to raise concerns without fear of retaliation.

Infinera has a dedicated cross-functional compliance team, which consists of involvement from the following departments:

- **Procurement**
- **Internal Audit**
- **Sales**
- **Legal**
- **Human Resources**
- **Finance**

Training

Infinera employees with direct responsibility for supply chain management receive training on all Infinera policies, practices, and procedures designed to ensure that Infinera's supply chain is free of human trafficking and slavery, including general risk mitigation. Infinera employees also receive training on the Infinera Code of Business Conduct and Ethics, which details Infinera's support and respect for internationally proclaimed human rights and reinforces Infinera's commitment to ethical business practices and good corporate citizenship. Infinera's training programs are reviewed and updated as necessary. Infinera also requires its business partners to train their staff, suppliers, and providers.

Our Effectiveness in Combating Slavery and Human Trafficking

Infinera is committed to responsible sourcing, including eliminating human trafficking and slavery, if any, in its supply chain, and continuously evaluates ways to improve its current practices and procedures. In the event Infinera learns of any allegations of human trafficking or slavery through its whistleblowing system, supplier audits, or any other means, Infinera will act promptly and effectively in the best interests of the workers affected, which could mean the termination of the business relationship with the CM, supplier or contractor concerned.

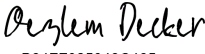
Infinera has appointed Source Intelligence and EcoVadis as independent third parties to conduct externally facilitated reviews to bring insights on ways Infinera can address slavery and human trafficking.

Infinera's Environmental, Social, and Governance ("ESG") Working Group tracks several Key Performance Indicators, including Supply Chain Management and Responsible Sourcing. This ensures that our supply chain follows our policies on Modern Slavery, forced labor, and decent working conditions. Critical aspects of these policies are promoting the protection of human rights in Infinera's operations and its supply chain by ensuring Infinera's activities do not have negative impacts on workers' rights or freedoms and taking action to remove from the supply chain child labor, forced or compulsory labor, unsafe working conditions, harm to migrant workers, and excessive working hours. Infinera is committed to continuing our dedication to ethical and sustainable business practices and will continue to utilize the ESG Working Group to continue to monitor and make recommendations on further improving our supply chain integrity, including mitigating the risk of human slavery and trafficking.

Board Approval

The Board of Directors of Infinera Corporation approved this Joint Statement on May 30, 2025.

INFINERA CORPORATION

Signed by:

B84FF026048C465...
Name: Oezlem Decker
Title: Director
Date: 04 June 2025

Australia


The board of Infinera Pty Ltd approved this Joint Statement.

Signed by:

07466A080588423...
Name: Susan Villare
Title: Director
Date: 04 June 2025

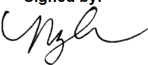
United Kingdom

The board of Infinera Limited approved this Joint Statement.

Signed by:

7698C57BB1764FB...
Name: Nancy Erba
Title: Director
Date: 04 June 2025

Canada

The board of Infinera Canada Inc. approved this Joint Statement.

Signed by:

7698C57BB1764FB...
Name: Nancy Erba
Title: Director
Date: 04 June 2025