



Calix's Statement on the Prevention of Modern Slavery

About This Report

This report was prepared by Calix, Inc. to meet the reporting obligations under the Australian Modern Slavery Act 2018 (Cth)¹, and the UK Modern Slavery Act of 2015². Calix, Inc. and its subsidiaries (“Calix”), including but not limited to Calix Networks UK Ltd., share the same core business operations and supply chains, as well as policies and processes prohibiting modern slavery, which are further described in this statement. This report covers Calix, Inc.’s most recently completed financial year, which ended on December 31, 2024 (the “Reporting Period”).

Structure, Activities and Supply Chains

Structure and Activities

Calix, Inc. is a corporation, incorporated in the state of Delaware and listed on The New York Stock Exchange under the trading symbol “CALX”. Calix’s principal executive offices are located in San Jose, California, United States of America (“U.S.”).

We develop, market and sell our broadband platform (cloud, software, and systems) and managed services to service providers of all types and sizes. Our mission is to enable service providers to become broadband experience providers, by helping them to simplify their operations, customer engagement, and service, innovate for their consumer, business, and municipal subscribers, and grow their businesses and the communities they serve.

Calix sells to various customers globally, including in Australia, Canada, the United Kingdom and the U.S. Calix employed 1,820 full-time employees as of December 31, 2024, with 1,013 employees located in the U.S. and 807 located outside of the U.S., primarily in Canada, China and India.

For additional information on Calix’s offerings, purpose and mission, including Calix’s sustainability efforts, please refer to our annual report found on the [Investor Relations](#) and [Sustainability](#) sections of our website.

Supply Chain

Supply chains are essential to Calix’s business. Calix primarily relies upon third-party manufacturing partners, including Original Design Manufacturers (“ODMs”), to manufacture our hardware products and systems. Our ODM partners are also primarily responsible for the procurement of raw materials and components for those products. Because Calix relies on third-party manufacturing partners to source and produce our products, we require our partners to regularly engage with and assess their supplier base to evaluate the components

¹ For the purpose of the Australian Modern Slavery Act 2018 (Cth), Calix, Inc. is the only ‘reporting entity’ and makes this statement as a single statement pursuant to section 13. This modern slavery statement has been approved by the principal governing body of Calix, Inc. and has been signed by a responsible member (see page 7).

² For the purpose of the UK Modern Slavery Act of 2015, Calix, Inc. is the ‘reporting entity’.

and materials used to produce our products.

Calix's third-party manufacturers are located in Vietnam, Taiwan, and the U.S. Calix supports, and we expect our suppliers to support, the values and philosophies reflected in the Electronic Industry Citizenship Coalition Code of Conduct, including promoting safe working conditions for employees, treating workers with respect and dignity, and conducting business in an environmentally responsible and ethical manner.

Calix leverages products and services provided by a third-party vendor, Ecovadis SAS ("EcoVadis"), to monitor our supply chain risk, including EcoVadis IQ Plus, a contactless risk screening tool which helps to assess risk based on inherent sustainability risks (country & industry) and procurement risk (criticality & spend levels). In 2024, we mapped 99% of our direct suppliers and 82% of our indirect suppliers³ leveraging this tool.

For further insights related to forced labor risks, we use the Modern Slavery Lens feature within EcoVadis IQ Plus. This dashboard categorizes suppliers as Moderate, Strategic, or Critical, and helps aggregate child and forced labor-related improvement areas using ratings results to help Calix prioritize which suppliers require interventions and corrective actions.

Calix supplier personnel have also utilized EcoVadis Academy, completing courses dedicated to the topic of forced labor and its prevention. Calix uses EcoVadis Academy Training Dashboard to track how many employees and suppliers have taken specific trainings, which helps us track supplier progress and drive improvements. If we notice a low completion rate of a course we deem to be important, we can implement a requirement for certain individuals to take the course. We can also use requirements to take a course as part of a corrective action with a supplier.

Policies and Due Diligence Processes in Relation to Modern Slavery

Policies Implemented

Calix has several policies that prohibit modern slavery as listed below. These policies apply to the entire Calix organization, including all Calix subsidiaries.

- [Supplier Code of Conduct \("SCC"\)](#): Calix created our SCC in 2024 and requested that suppliers acknowledge and comply with our SCC, embedding responsible business conduct into their policies and management systems. As part of this effort, suppliers must agree to not use or contribute to slavery, servitude, forced or compulsory labor, human trafficking, and child labor. Furthermore, suppliers must have a grievance process in place whereby their employees and staff can report alleged violations of our SCC. Direct suppliers of Calix must also make reasonable efforts to ensure that their suppliers comply with the principles of our SCC.

³ Our indirect suppliers are measured by 80% of indirect spend in EcoVadis.

- [Global Human Rights Policy](#): Calix is dedicated to upholding human rights, adhering to high ethical standards, and complying with laws and regulations. This policy ensures that respect for human rights is integrated throughout the Calix organization.
- [Code of Business Conduct and Ethics \(“COBCE”\)](#): Our COBCE sets out the guidelines for conducting the business of Calix consistent with the highest standards of business ethics. The COBCE applies to all Calix directors, officers and employees, and requires that they comply with all laws, rules and regulations applicable to Calix’s operations. The code also specifically underscores our commitment to providing equal opportunity and fair treatment to all individuals. E-learning with respect to our COBCE is mandatory for all our employees, both upon on-boarding and annually thereafter.
- [Conflict Minerals Report](#): Calix primarily relies upon third-party manufacturing partners to manufacture our products, including the purchase of components or materials that may contain smelted or refined minerals and the purchase of raw ore or minerals. As a result of this third-party manufacturing model, Calix is several levels removed from the purchase of raw ore and minerals, and the mining of conflict minerals. Since these purchases occur much further upstream in Calix’s supply chain, Calix engages a third-party vendor to assist with survey efforts and outreach with our third-party manufacturing partners in order to determine whether components or materials included in Calix products contain conflict minerals.

Processes Implemented

Calix continually monitors our inherent risk of modern slavery via the Modern Slavery Dashboard in EcoVadis IQ. The Modern Slavery Dashboard aggregates all modern slavery-related improvement areas to help prioritize suppliers requiring interventions and corrective actions. The dashboard designates suppliers as low, medium or high-priority.

Calix also encourages employees and interested third-party vendors, customers and business partners to make us aware of any practices, procedures or circumstances that raise concerns about the integrity of our business practices by reporting via an Ethics Helpline that is available 24 hours a day, 7 days a week at 1-877-231-8016 or on the internet at www.calix.ethicspoint.com. Individuals may remain anonymous and will not be required to reveal their identity when submitting complaints to the Ethics Helpline. Calix prohibits retaliation against anyone who, in good faith, raises a complaint or cooperates with any investigation.

Risk of Modern Slavery in our Supply Chains and Steps Taken to Assess and Manage the Risk

Calix worked with our third-party vendor, EcoVadis, to assist with reaching out to our suppliers. All of Calix’s direct suppliers, and a majority of our indirect suppliers⁴ are required

⁴ Calix requires its indirect suppliers who make up 80% of its annual spend to either utilize EcoVadis to perform an assessment or to have an alternative ESG rating. The percentage is measured by Calix’s purchase volume with indirect suppliers.

to either have an ESG rating or perform an assessment through EcoVadis. Through this project, Calix was able to map high-risk suppliers based on the location of the supplier's business, type of business, and status of assessment in EcoVadis.

The EcoVadis assessment specifically asks about the presence of forced labor in the supplier's activities, which factors into the overall risk score of the supplier. EcoVadis' 360° Watch offering provides details about news articles or other public documents published in the prior 5 years which negatively affect a supplier's risk score. This detailed information allows Calix to provide targeted communications to suppliers to assist with improving their scores.

In 2024, the EcoVadis Modern Slavery Dashboard designated four of Calix's suppliers as high priority. After further research, Calix determined that at least one of the designations was based on a news report from 2018, which was no longer relevant. Nonetheless, we note that all four of the designated suppliers were in the manufacturing industry, indicating to Calix that this area of our supply chain is the riskiest with regard to modern slavery. Calix will continue to utilize EcoVadis' Modern Slavery Dashboard in 2025, and on at least a quarterly basis, will reach out to any supplier which receives a high priority designation with a targeted request for corrective action. Calix will then follow up to ensure the supplier takes the actions necessary to address the cause of the high-risk designation.

Calix's also audits our top-tier suppliers every two years. For these purposes, we consider the top 80% of direct suppliers, based on annual spend, to be top-tier. In addition, Calix's Supply Chain Risk Management team meets with our Tier 1 direct suppliers quarterly, assisting in remediation efforts when appropriate.

Measures Taken to Prevent and Remediate Modern Slavery

Calix has taken action to prevent modern slavery from occurring by requesting corrective action via the EcoVadis platform. If a supplier has an overall low-level risk score, Calix requests that the supplier complete a corrective action aimed at remediating the behaviors which caused the low score. Beginning in 2025, Calix will enhance our efforts by specifically targeting suppliers identified by EcoVadis as high-priority for modern slavery with corrective action requirements to reduce the identified risk. Calix also reaches out to suppliers via email to highlight the misalignment with our Supplier Code of Conduct.

We did not require our suppliers to make any specific remediation measures in the Reporting Period. Given that no remediation actions have been taken, there is no anticipated loss of income to the most vulnerable individuals.

Training Provided to Employees and Suppliers on Modern Slavery

Calix employees can access EcoVadis Academy's online courses, where child and forced labor related courses are provided. These e-learning courses help our relevant teams (e.g. sustainability team, strategic sourcing team, compliance team) understand how to identify modern slavery in their daily operations and implement best practices to address it.

In 2024, there were in total 40 employees at Calix with access to EcoVadis Academy, of

which one employee finished at least one of the e-learning courses related to forced labor. Calix believes that this take rate is lower than intended, so in support of our goals of increasing employees awareness about modern slavery, Calix will (i) require that all of our strategic sourcing team members take the Child and Forced Labor Prevention course in the first half of 2025, and (ii) encourage participation in this course by all of our employees with access to EcoVadis Academy.

Calix's suppliers set up in the EcoVadis platform also have access to this optional training via EcoVadis Academy. Although in 2024 none of our suppliers took the training, Calix intends to actively encourage our suppliers to undertake the aforementioned course in 2025. At a minimum, we will require any supplier which receives a high-priority rating from EcoVadis related to modern slavery to take the training as part of its corrective action. This initiative aims to boost participation rates and ensure that our suppliers are well-equipped to identify instances of modern slavery in their daily operations and implement best practices to address this issue.

Assessment of Effectiveness of Actions Taken

Calix has implemented our third-party vendor EcoVadis to continuously monitor modern slavery risks among our direct and indirect suppliers. Calix strives to continually improve upon the effectiveness of this program and further mitigate these risks. Calix has used various reporting dashboards within EcoVadis Ratings, including the Modern Slavery Dashboard, to monitor this progress. Some examples of key performance indicators that Calix tracks:

- Specific related corrective actions completion rate
- EcoVadis Academy related courses completion rate
- Supplier management system improvement trend based on Modern Slavery Dashboard action priorities
- Labor & Human Rights theme score improvement year over year

Calix strives to increase our direct and indirect outreach efforts with our suppliers and improve awareness of modern slavery upstream in the supply chain.

Consultation with Subsidiaries

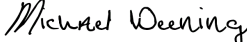
As outlined earlier in this Statement, Calix and its subsidiaries share the same core business operations and supply chains, as well as policies and processes prohibiting modern slavery. Calix is a well-integrated business, and it has communicated with its subsidiaries regarding this statement and our approach to modern slavery.

Approval and Attestation

The Board of Directors of Calix, Inc., which is our principal governing body, has approved this modern slavery statement as of February 13, 2025, and delegated authority to Michael Weening as a Board member, President and CEO of Calix, Inc., to sign this statement on behalf of the Board of Directors.

Date: February 13, 2025

Signed for and on behalf of Calix, Inc by:

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Michael Weening
Director, President and CEO
CALIX, INC.