



## **OFS Anti-Modern Slavery and Human Trafficking Statement**

### **I. Business, Organization.**

OFS Fitel, LLC (“OFS”) is a manufacturer of optical fiber, optical fiber cable, and specialty fiber and cable products, and also provides certain professional services regarding its products. It is a limited liability company headquartered in Norcross (a suburb of Atlanta), Georgia, USA. It has facilities and subsidiaries not only in the United States, but also in Denmark, Germany, Morocco, and Russia.

### **II. General**

OFS’ policy is for all its worldwide operations to conduct all business with integrity in an honest, professional, and ethical manner. That policy begins with the OFS Corporate Social Responsibility Policy and the OFS Standards of Conduct. Collectively they require compliance with human rights, employee safety and working conditions legislation, and prohibitions on forced, slave or child labor and human trafficking.

OFS considers human trafficking a violation of basic human rights and a form of forced labor, even when there has been apparent individual consent. We have, therefore, a zero-tolerance approach to modern slavery and human trafficking within our organization and supply chain.

### **III. Supply Chain**

Our supply chain consists of third parties which provide raw materials and other products and services. Our Standards of Conduct require that we consider supplier integrity as a factor in evaluating possible suppliers. Our corporate social responsibility policy (CSR; available at [www.ofsoptics.com](http://www.ofsoptics.com)) requires that suppliers meet or exceed recognized standards. Prohibition of slavery and human trafficking in the supply chain are an important part of those standards.

Certification: Our standard procurement agreement and purchase order terms require suppliers to comply with the guidelines in the CSR and with applicable laws which would contain prohibitions on slavery and human trafficking. By accepting OFS’ agreement or terms of purchase, suppliers agree to follow the CSR principles. We consider such acceptance a



certification and verify it by maintaining copies of procurement agreements and a database summarizing them. We also maintain copies of purchase orders with accompanying terms of purchase.

Supplier Visits: In conducting our normal business, supplier visits are customary. If at any time there is a concern regarding a violation of OFS standards, the OFS employee will escalate his or her findings to management which will contact the OFS Supply Chain Organization. We do not otherwise audit our suppliers regarding risks of human trafficking and slavery and do not verify our supply chain regarding those risks.

Internal Accountability: Our CSR and Standards of Conduct apply to all employees, including those responsible for supply chain activities. Because our CSR and Standards of Conduct require compliance with human rights, employee safety and working conditions legislation, and prohibitions on forced, slave or child labor and human trafficking, employees are on notice they are responsible for monitoring, avoiding and reporting these risks in supply chain activity.

Our CSR is posted on our internet site ([www.ofsoptics.com](http://www.ofsoptics.com)), updated annually and is also posted on our internal intranet site for easy employee access. Our Standards of Conduct are circulated to employees whenever revised, and annually. All employees are required to make an annual certification that they have reviewed and understand our Standards of Conduct.

Training: OFS conducted awareness training for its employees in key functions at several of its facilities and expects to provide such training at its remaining facilities during the upcoming fiscal year.

#### IV. Visibility and Reporting

OFS is posting this anti-modern slavery and human trafficking statement on its internet site. A "hot line" for reporting noncompliance is available to OFS employees. OFS has a "Whistleblower Policy" to enable confidential and anonymous reporting.



This Anti-Modern Slavery and Human Trafficking statement will be reviewed on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act of 2015 (UK) and the California Transparency in Supply Chains Act (Cal Civil Code §1714.43) and constitutes our anti-modern slavery and human trafficking statement for the fiscal year ended 31 March 2023.

A handwritten signature in cursive script that reads 'Holly Hulse'.

Holly Hulse  
President and CEO  
OFS Fitel, LLC