



Adtran's position on slavery and human trafficking

Transparency statement 2025



TRANSPARENCY STATEMENT 2025

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Profile

Adtran is a leading global provider of networking and communications equipment, serving a diverse domestic and international customer base in 68 countries that includes tier 1, 2 and 3 service providers, cable/MSOs and distributed enterprises. Our innovative solutions and services enable voice, data, video and internet communications across a variety of network infrastructures and are currently in use by millions worldwide. We support our customers through our direct global sales organization and our distribution networks.

In 2021, Adtran combined its business with Adtran Networks SE (formerly ADVA Optical Networking SE) to create a global leader in scalable, end-to-end fiber networking solutions for communication service providers, enterprises, and government customers. The merger united our fiber access, fiber extension, and subscriber connectivity technology with ADVA's innovation in data center interconnect solutions for large enterprises, business Ethernet and network synchronization. Both companies are pioneers in open, disaggregated solutions with a shared vision for the future of fiber networking. Our combined business offers a comprehensive portfolio for providing homes, businesses and 5G infrastructure with scalable, secure and assured fiber connectivity, paired with cloud-managed Wi-Fi connectivity and SaaS applications. Together, we are a trusted supplier to more customers worldwide, meeting new requirements, optimizing network performance, and improving customer experience.

Our vision

Our vision is to enable a fully connected world, where the power and freedom to communicate is available to everyone, everywhere, in a secure, efficient, and sustainable environment.

Our commitment

Adtran is committed to conducting business with integrity, accountability, and respect for human rights

Modern slavery and human trafficking

Adtran does not tolerate any form of slavery, forced labour, or human trafficking. We are committed to identifying, preventing, and mitigating the risk of modern slavery within our operations and supply chain, in line with the UK Modern Slavery Act 2015 and similar international laws.

Adtran's supply chain

Adtran relies on a global network of suppliers and electronic manufacturing service (EMS) partners. Manufacturing and deployment activities are largely outsourced, which is where Adtran recognizes the greatest inherent risk relating to modern slavery.

- **Adtran Supplier Code of Conduct:** All suppliers are required to comply with Adtran's Supplier Code of Conduct, which is aligned with the Responsible Business Alliance framework.



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- Forced or compulsory labor is strictly prohibited. Detailed proceedings and results are published in Adtran's sustainability report, which is updated annually and available on our website.

Supplier risk assessment and due diligence: Adtran applies a risk-based approach to assessing modern slavery risks, considering both likelihood and potential severity. Focus areas include electronics manufacturing services, logistics, and the use of subcontracted labor. Supplier onboarding includes questionnaires, risk assessments, and, where required, audits. In 2025, no confirmed incidents of slavery or human trafficking were identified. Adtran recognizes, however, that risks cannot be eliminated in complex global supply chains and therefore remains committed to continuous monitoring.

- **Overarching risk management:** Modern slavery and human trafficking are assessed as risk areas with currently low likelihood but potentially high severity. These risks are reviewed regularly and reassessed when changes occur in supplier footprint or operating regions.
- **Effectiveness, monitoring and continuous improvement**

Adtran monitors the effectiveness of its actions to address modern slavery and human trafficking through a combination of qualitative and quantitative indicators. These include, among others, supplier risk-assessment coverage, audit completion rates, the implementation of corrective action plans, and the use of grievance and whistleblowing mechanisms.

 - In 2025 we cover with our ESG compliance tool 98% (1386 from 1409) of our material suppliers, representing more than 98% of our material spend. , through structured ESG and human-rights risk assessments. Where gaps or potential risks are identified, follow-up actions are defined and tracked in cooperation with the respective suppliers.

Adtran acknowledges that the absence of confirmed incidents does not eliminate the underlying risk of modern slavery in complex global supply chains. The company, therefore, remains committed to continuous improvement, including the gradual expansion of supplier assessments, enhanced data quality, and deeper supply-chain transparency beyond tier-1 suppliers.

Grievance mechanisms and remediation:

Employees and business partners may raise concerns confidentially and, where permitted, anonymously. Where adverse impacts are identified, Adtran prioritizes remediation in cooperation with suppliers, consistent with the UN Guiding Principles on Business and Human Rights.



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Integration with sustainability reporting:

This Transparency Statement forms part of Adtran's broader human rights due diligence framework and contributes to disclosures under the EU Corporate Sustainability Reporting Directive (CSRD), in particular ESRS S2 (Workers in the value chain) and ESRS G1 (Business conduct).

Legal entity scope and applicability:

This Statement is responsive to website disclosures required under the United Kingdom Modern Slavery Act and other laws and regulations globally pertaining to transparency in supply chains and covers Adtran's subsidiaries, Adtran Europe Ltd. and Adtran Networks (UK) Ltd. This statement is applicable for the period January 1 to December 31, 2025.

Governance and oversight

Oversight of modern slavery and human rights risks is embedded within Adtran's governance framework. Senior management is responsible for the implementation of this Transparency Statement and for ensuring that appropriate policies, processes and controls are in place to identify and address modern slavery risks.

This Transparency Statement is reviewed and approved at director level for the relevant UK legal entities, reflecting Adtran's commitment to accountability and responsible business conduct.

Approval and sign-off:

Adtran Europe Ltd.
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Stuart Broome, director

Date: 3/11/2026

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Gunnar Wilsdorf, director

Date: 3/11/2026

Adtran Networks (UK) Ltd.
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Stephan Eppner, director

Date: 3/11/2026

Signed by:

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Timothy Santo, director and CFO

Date: 3/11/2026