

# Frequently Asked Questions

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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a confidential reporting tool administered by an independent company, NAVEX Global, to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

## Reporting – General

### Why should I report what I know? What’s in it for me?

Integrity is a Ciena core value. Asking questions and raising concerns are critical ways of living that value. We all have the right to work in a positive environment, and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know when we have questions or concerns. By working together, we can maintain a healthy and productive environment.

### What type of situations should I report?

The EthicsPoint system can support raising any ethics concerns or for reporting any violations of our Code of Conduct or other such concern.

### **If I see a violation, shouldn't I just report it to my manager?**

Reporting misconduct or ethics concerns isn't just an option – it's each employee's responsibility. Ideally, you should bring any concerns forward to your direct manager or to our General Counsel, or a member of Ciena People and Culture and/or Legal. We recognize, though, that there may be circumstances in which you might not be comfortable reporting an issue that way. That's one reason we've partnered with EthicsPoint to provide this service. We would rather you report it through this service than keep the information to yourself.

### **Who else can I speak to at Ciena about something I believe should be reported?**

Ciena considers open and honest communication to be a vital part of a positive work environment. We are committed to maintaining a workplace in which employees can raise concerns without fear of retaliation, and there are many resources available to assist you should you have questions or concerns. Your direct manager may be the best situated to help navigate an integrity issue. Other resources include another member of management, Ciena People and Culture and Legal. If you are not an employee, do not have access to the resources above or prefer to use EthicsPoint, the system is available 24 hours a day, 7 days a week.

### **Does management really want me to report?**

Yes. In fact, we need you to report. You know what is going on in our company – both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

### **May I report using either the Internet or the telephone?**

Yes. With EthicsPoint, you have the ability to file a report either through telephone or the Internet.

### **Where do these reports go? Who can access them?**

Reports are entered directly on the EthicsPoint secure server to prevent breaches in security. EthicsPoint makes these reports available only to specific individuals within the Company who are charged with evaluating the report based on the type of violation and location of the incident. Each of these report recipients has had training in handling the reports in confidence. Please see below on Reporting Security & Confidentiality for more information.

## **What happens after I make a report through EthicsPoint?**

When a report is submitted, an electronic summary is sent to appropriate resources within Ciena for review and to determine further action. Whether you submit your concern by telephone or through this online portal, you will receive a Report Key and Password that can be used to follow up on your submission. We encourage you to do so in the event additional information may be needed from you. If you reported anonymously, the questions will be posted through this web portal for you to review and respond using your Report Key and Password.

Due to considerations such as confidentiality and employee privacy, you may or may not receive information on the ultimate results of the investigation, but you will receive confirmation that the issue has been addressed.

## **Who administers the telephone hotline and online reporting portal?**

The telephone hotline and online portal are administered by an independent company (NAVEX Global). All reports will be routed to appropriate personnel within Ciena for review.

## **Reporting Security & Confidentiality**

### **It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website.

### **Anonymous reporting is available where I live. Can I file a report from home and still remain anonymous?**

A report from a computer at home, a neighbor's computer, or any Internet portal will remain secure and anonymous. The EthicsPoint system strips away Internet addresses to maintain anonymity. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

**I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you – as a reporting party – need to ensure that the body of the report does not reveal your identity by accident. For example, “From my cube next to Jan Smith...” or “In my 33 years...”.

**Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report, and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

**What if I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish.

## **Tips & Best Practices**

**If I have a question about the Code of Conduct, who should I contact for help?**

If you have any questions about the Code, you may address your questions to your manager or to our General Counsel, or a member of Ciena People and Culture and/or Legal. If you do not feel comfortable using any of those avenues and prefer asking your question anonymously, you may ask your question via EthicsPoint.

**I am not sure if what I have seen or heard violates company policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

**What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

**What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique username and are asked to choose a password. You can return to the EthicsPoint system later either by Internet or telephone and access the original report to add more detail, answer questions posed by a company representative, or add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions that may arise.

**Are these follow-ups on reports as secure as the first one?**

Yes. All EthicsPoint correspondences are held in the same strict confidence as the initial report.