

## 1. General

The Ethics and Compliance Helpline (“Helpline”) is made available for employees, line managers, directors and officers as well as customers, suppliers, vendors and other third party business partners (“Reporters”) of Adtran Networks SE, a German corporation having its principal place of business at Fraunhoferstrasse 9a, 82152 Martinsried/Munich, Germany.

Parts of the data processing we are performing jointly together with ADTRAN Holdings Inc. Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, USA and its affiliates (collectively as Adtran). Joint processing is taking place to process any reports filed under the Helpline. We keep your personal data confidential and ensure that you may exercise your rights free of charge by writing an email to dataprotection(at)adtran.com as single point of contact. For more information, please see below “Rights of Data Subjects and Contact Person”.

It enables Reporters to report certain breaches of laws or regulations or deriving internal policies that govern the business operations in all countries where Adtran and its subsidiaries and affiliates do business (“Violations”). Reports can be filed either online or by telephone (toll-free numbers are available). As the Helpline is not intended for general questions, enquiries or complaints about Adtran or about products or services provided by Adtran, such will not be processed.

In connection with the Helpline, Adtran may, as a data controller, collect, process and use your personal data as further described in this data privacy notice. The Helpline through which you can report a Violation or ask a question on Adtran’s Group Code of Conduct and its application to certain business situations (“Report”) as well as the database that stores the Report and the related personal data are operated on behalf of Adtran by the service provider EthicsPoint, a subsidiary of NAVEX Global, Inc, a Delaware corporation having its principal place of business at 6000 Meadows Road, Suite 200, Lake Oswego, OR 97035, USA (“NAVEX”).

The Helpline is a confidential reporting tool. Adtran treats the identity of the Reporter as strictly confidential and will not generally disclose it to the persons incriminated in the report. This commitment extends to all Reports that eventually turn out to be false later on. If Reports were found to be unsubstantiated and not reported in good faith but by maliciously making false declarations, however, identity of the Reporter(s) may have to be disclosed to the incriminated person, in particular if national law requires such disclosure. Adtran prohibits any form of retaliation or threat of retaliation (“Retaliation”) and actions may be taken by Adtran to prevent any Retaliation. While any alleged Violation will be taken seriously and may result in disciplinary action, up to and including termination of employment and civil or criminal penalties, disciplinary action and other sanctions against a Reporter will only be taken if the Helpline is abused for malicious reporting.

## 2. Use and Purpose of the Ethics and Compliance Helpline

The use of the Helpline is voluntary and serves as an alternate and secondary reporting tool to the usual reporting channels such as Adtran’s respective line management up to and including Adtran’s management board, Adtran’s Compliance Department and Adtran’s Ombudsman. Please only use the Helpline if you think that your usual reporting channel within Adtran would not be sufficient. Adtran encourages you to identify yourself when submitting a Report. Investigations can be completed faster and more effectively when the

Reporter is identified, since this allows direct follow-up in particular in case essential factual data (in particular “who”, “did what”, “when” and “where”) is missing or unclear. If required and legally allowed, you may, however, opt for anonymous reporting, in which case you will not have to state your name.

Adtran has implemented the Helpline to receive alleged Violations, to investigate those Violations group-wide and globally, and to take remedying actions and sanctions and thus prevent (any) future Violation(s). Please note that the information reported via the Helpline may result in decisions and measures affecting others. Therefore, please only provide information that, to the best of your knowledge, is accurate, complete, and necessary.

### 3. Which personal data and information will be collected and processed?

In connection with the Helpline Adtran may collect, process and use the following personal data about the Reporter, the individual who is mentioned or otherwise involved in a Report and any other third party involved in the investigation of such Report (collectively “Data Subjects”):

#### Reporter Identification Information:

- Reporter is a current employee of Adtran or not;
- Reporter’s first and last names;
- Reporter’s phone number;
- Reporter’s email address; and
- Best time for communication with the Reporter.

#### Information about the Violation(s):

- Facts reported by the Reporter, including the identity, function and contact details of individuals allegedly involved in the Violation, and of individuals who could or did provide information on the Violation;
- Statement about the suspected management involvement and, if applicable, the identity of the manager(s) who seem(s) to be involved;
- Information whether the Violation has already been reported to a line manager or other managerial staff;
- The general nature of the alleged Violation and how, where and when it occurred, how long it was going on and how the Reporter learned about the Violation;
- Identity of persons who allegedly attempted to conceal the Violation and the steps they took to conceal it;
- Details on how the alleged Violation is (or was) investigated;
- Information gathered during the investigation and outcome thereof; and
- Name and job title/position of employees at data importers who carried out or were involved in the investigation.

#### 4. How are Reports processed and who may access the provided personal data and information?

The Report and any data that you may supply will be stored in the Helpline database that is hosted and operated by NAVEX. NAVEX adheres to the U.S.-EU Safe Harbor Principles that ensure a comparable level of data protection as provided e.g. in the EU and any other country with similar data protection laws. In addition, NAVEX secures and encrypts personal data during transfer and storage. Navex has been instructed by Adtran to transfer the Report with any personal data and information to the global Compliance Department of Adtran, located in Martinsried/Munich, Germany for purposes of a group-wide and centralized review and investigation. The Compliance Department will verify the information provided, and, if need for an investigation is given, initiate further investigations typically led by an independent internal department of Adtran Germany, such as the Compliance Department itself, the Internal Audit, Human Resources, Legal or any other neutral department of Adtran. If necessary and in compliance with applicable law, Adtran may also engage external advisors (e.g. law firm or auditors) to assist with the investigation. In individual cases and only to the extent legally required or permitted, other persons/legal entities may receive personal data (e.g. courts, law enforcement authorities, affiliates of Adtran or other third parties who may be affected by a reported Violation). Upon completion of the investigation the Compliance Department may inform Adtran's management or supervisory board of the outcome of the investigation.

Persons mentioned in a Report are notified after the Report was received. Where there is substantial risk that such notification would jeopardize the ability to effectively investigate the Report or gather necessary evidence, however, notification to the persons mentioned in a Report may be delayed as long as such risk exists.

The personal data provided by a Reporter will be kept as long as necessary to investigate the Report and, if applicable, to take remediating actions and sanctions, or if otherwise needed for legal and procedural reasons. If such is not applicable, the personal data will be deleted within (2) two months after the investigation of the Report has been closed.

#### 5. Restricted use of the Helpline for certain Countries

Due to country specific data protection regulations additional steps are necessary before the Helpline can be launched in Austria, Belgium, Finland, France, Norway, Poland, Spain, Sweden and Switzerland. As long as these steps are pending the Helpline does not allow Reports to be submitted out of and/or for these countries. In this case please contact the reporting lines outlined in section 2.

#### 6. Rights of Data Subjects and Contact Person

You have certain rights including the right to request a copy of the personal information we hold about you, if you request it from us in writing:

**Right to access:** the right to obtain access to you any personal information, and certain other information (like that provided in this Privacy Policy).

**Right to correct:** if personal information is inaccurate or incomplete you have the right to have this rectified.

**Right to erasure (the right “to be forgotten”):** this enables you to request the deletion or removal of your personal information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions. For example, we have the right to continue using your personal information if such use is necessary for compliance with our legal obligations or for the establishment, exercise or defense of legal claims.

**Right to restrict our use of your information:** the right to suspend the usage of your personal information or limit the way in which we can use it. Please, note that this right is limited in certain situations: when we are processing your personal information that we collected from you with your consent you can only request restriction on the basis of: (a) inaccuracy of data; (b) where our processing is unlawful and you don't want your personal information erased; (c) if you need it for a legal claim; or (d) if we no longer need to use the data for the purposes for which we hold it. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for restriction of the use of their personal information to make sure the restriction is respected in future.

**Right to data portability:** the right to request that we move, copy or transfer (where technically feasible) your personal information in a structured, commonly used and machine-readable format, for your own purposes across different services.

**Right to object:** the right to object to our use of your personal information including where we use it for our legitimate interests, direct marketing.

**Right to be informed:** you have the right to be provided with clear, transparent and easily understandable information about how we use your personal information.

**Right to withdraw consent:** if you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful).

The exercise of these rights is free of charge, however you are required to prove your identity with two pieces of approved identification. We will use reasonable efforts consistent with our legal duties to provide, correct or delete personal information about you from our files.

To make inquiries or exercise any of your rights set out in this Privacy Policy and/or make a complaint, please contact us by emailing or write to us and we will endeavor to respond within 30 days. Contact details can be found in the section Responsible for Processing Personal Information above.

When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints that we cannot resolve directly.

If you are not satisfied with the way any complaint you make in relation to your personal information has been handled by us then you may refer your complaint to the relevant data protection supervisory authority.

## 7. Where can you lodge a complaint?

You have the right to raise a complaint with our Data Protection Officer (for contact details see above) or with any supervisory authority of your habitual residence, place of work or place of the alleged infringement. Or you can contact Adtran Networks's lead data protection authority:

Bayerisches Landesamt für Datenschutzaufsicht

Promenade 27 (Schloss)

91522 Ansbach

Germany

Phone: +49 (0) 981 53 1300

Facsimile: +49 (0) 981 53 98 1300

Email: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)