Q1 – What is the Ethics and Compliance Helpline and by whom is it operated?

The Ethics and Compliance Helpline allows confidential and anonymous, web based and by-telephone reporting and is provided by Adtran Networks SE, a German corporation having its principal place of business at Fraunhoferstrasse 9a, 82152 Martinsried/Munich, Germany. It is provided jointly with Adtran Holdings Inc. Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, USA and its affiliates (collectively as Adtran).

The telephone hotline and the website where you can raise a concern or ask a question ("Report") as well as the database that stores the Report and the related data are operated by EthicsPoint, a subsidiary of NAVEX Global, Inc, a Delaware corporation with its principal place of business at 6000 Meadows Road, Suite 200, Lake Oswego, OR 97035, USA ("NAVEX"). The Ethics and Compliance Helpline enables Adtran employees, suppliers, customers and business partners to report violations of the law, Adtran's policies or ethical standards ("Violations"), or to ask questions on Adtran's Code of Conduct and/or its application to certain business situations. Adtran guarantees that all Reports will be taken seriously and handled confidentially. Adtran prohibits any form of retaliation or threat of retaliation ("Retaliation"). Any Retaliation is subject to sanctions and should also be reported immediately.

Q2 – How does NAVEX ensure confidentiality and data security?

NAVEX adheres to the U.S.-EU Safe Harbor Principles that ensure a comparable level of data protection as available 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. To verify adequacy of these measures, NAVEX utilizes independent external auditors. NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your device to NAVEX is available. In fact, NAVEX is contractually committed not to pursue a reporter's identity. If you feel uncomfortable filing a Report on your work PC, you can simply login to the NAVEX secure website from other devices. Many people choose this option, as NAVEX's data shows that fewer than 12% of Reports are generated during business hours.

Q3 – Why does Adtran Optical Networking need a system like the Ethics and Compliance Helpline and when shall I use it?

Adtran wants you to speak up when you believe violations of the law, our policies or ethical standards ("Violations") have occurred. In doing so, we encourage you to contact our Management, Compliance Department or Adtran's Ombudsman, an external, neutral intermediary. Adtran recognizes, however, that there may be situations when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with NAVEX. We would rather you report Violations o via the Ethics and Compliance Helpline than keep the information to yourself. We take all Reports seriously no matter how they are reported. However, if the high-level factual information ("who", "did what", "when" and "where") is missing or unclear, investigations of reported incidents may be harder and thus take longer .The Ethics and Compliance Helpline provides an easy and secure platform that enables Adtran to get into contact with the reporter e.g. if information is missing or unclear. It also allows the reporter to check on the status of his/her Report. An Ethics and Compliance Helpline is considered to be an essential part of an effective Ethics and Compliance Program.

Q4 – Does the Ethics and Compliance Helpline allow anonymous reporting?

If you opt for anonymous reporting, the system technically protects your anonymity, provided you do not enter your name or any information that makes it possible to identify you. We are interested in your tip-offs to prevent or clear up possible violations of the law, Adtran's policies or ethical standards ("Violations"), but not in your (i.e. the reporter's) personal data. However, many 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.

Q5 – Which information should i provide when reporting an incident?

All reported information must be in good faith and include, to the extent known, the essential factual data “who”, “did what”, “when” and “where”. Please note that the information supplied about yourself, Adtran’s employees, directors, officers, or suppliers, customers and business partners of Adtran or any other aspect in relation to Adtran, may result in decisions and measures affecting others. We therefore ask you to provide only information that, to the best of your knowledge, is accurate and complete. Reports made to the best of your knowledge, and not made intentionally or gross negligently incorrect, will of course, not expose you to any consequences initiated by Adtran. Furthermore, it is guaranteed that all information supplied will be treated confidentially.

Q6 – What shall I do after submitting my Report and how can I check my Report’s status?

At the end of your telephone call or web-based report or question (“Report”), you will be provided with a report key and asked to create a password. You can check the status of your Report and learn whether any additional information is needed via a simple Internet login or telephone call. This enables Adtran to get in contact with you even though you might have chosen to stay anonymous. Please check the status of your submitted Report 3 to 5 working days after filing it.

Q7 – How is Adtran Optical Networking investigating my Report?

The Report with any personal data and information will be transferred to the Compliance Department of Adtran, located in Martinsried/Munich, Germany. The Compliance Department will evaluate the information provided, conduct first preliminary analysis and, if the information provided indicate a need for an investigation, initiate further investigations typically led by a neutral internal department, Internal Audit, Human Resources, Compliance or any other neutral department or external advisors (e.g. law firm or auditors). The investigation proceeding is documented in detail in the “Whistleblower Report Process” available in Adtran’s Intranet.

Q8 – What if I face retaliation after submitting a Report?

Any person who in good faith seeks advice or reports potential or actual Violations has the protection of General Management. Adtran prohibits any form of retaliation or threat of retaliation (“Retaliation”). Any Retaliation is subject to sanctions and should also be reported immediately.