



INFINERA  
SUSTAINABILITY  
REPORT  
2015

# TABLE OF CONTENTS

About this Report	02	<b>ENVIRONMENTAL RESPONSIBILITY</b>	<b>28</b>
Letter from the CEO	03	Environmental Legal Compliance	29
<b>ABOUT INFINERA</b>	<b>04</b>	Energy and Climate	30
About Infinera	05	Carbon Footprint	30
Products and Services	07	Air Emissions	31
Sustainability Context Through the Value Chain	09	Waste and Recycling	31
<b>SUSTAINABILITY MANAGEMENT</b>	<b>10</b>	Water Management	33
Stakeholder Engagement	11	Greening Our Facilities	33
Materiality	12	<b>SOCIAL RESPONSIBILITY</b>	<b>35</b>
Sustainability Governance	13	Our Workforce	36
Memberships & Associations	14	Diversity and Inclusion	36
<b>BUSINESS ETHICS</b>	<b>15</b>	Facts & Figures	38
Fair Business Practices	16	Health and Safety	39
Compliance	17	Development and Engagement	41
<b>PRODUCT RESPONSIBILITY</b>	<b>18</b>	Community Engagement	44
Responsible Sourcing	19	<b>UNGC &amp; GRI CONTENT INDEX</b>	<b>46</b>
Management and Oversight	20		
Compliance Across the Value Chain	21		
Greening Our Products	23		
Product Quality and Customer Satisfaction	24		

## About this Report

This is the first annual sustainability report of Infinera Corporation (referred to herein as “we,” “us,” “our” and “Infinera”) and covers calendar year 2015. This report provides an overview of our sustainability programs and activities based on our identified material aspects. The focus of this report is our significant operations: headquarters, manufacturing, engineering and packaging operations, unless otherwise stated. This report is

aligned with the Global Reporting Initiative (GRI) G4 guidelines and meets GRI’s Core disclosure standards, but has not been externally assured. A full GRI Content Index, as well as a cross-reference to the UN Global Compact (UNGC) Principles can be found on pages 46–49. To provide feedback or to ask questions, please contact [sustainability@infinera.com](mailto:sustainability@infinera.com).



“Whenever possible, we aim to use our role to drive responsible choices, new best practices and a sense of obligation to the world around us.”

I am proud to introduce our first annual sustainability report, which highlights our commitment to sustainability across our global operations. This report is a significant step in fulfilling our commitment to transparency and leadership in our industry, and sets the stage for future sustainability initiatives.

We aim to create a corporation that considers all choices in light of our role in the global community. As an established player in transport networking, we recognize our role in the areas where we operate and in the marketplace. Whenever possible, we aim to use our role to drive responsible choices, new best practices and a sense of obligation to the world around us.

Infinera was founded with the vision of enabling an infinite pool of intelligent bandwidth that the next communications infrastructure is built upon. Infinera Intelligent Transport Networks connect people around the world, in order to provide communities with opportunities for economic growth. Additionally, Infinera’s Cloud Xpress addresses new cloud network architectures and new traffic patterns, which are servicing increasing bandwidth requirements. We are proud that Infinera is redefining optical networking, and we take this seriously.

In 2015, we expanded our sustainability program overall and laid foundations for longer-term goals and initiatives. Business ethics and integrity are a priority of our sustainability program, and in 2016 we joined the UNGC to cement principles of social and environmental responsibility. By actively reporting on our support to the UNGC’s ten principles, Infinera joins thousands of other companies in making business a force for good in the world.

We are committed to ensuring that responsible business practices are integrated into our global operations, including new acquisitions. A significant event for us in 2015 was our acquisition of Transmode in Europe, and the process of combining our operations, policies and culture will continue into 2016. We are fortunate that Transmode had a long history of sustainability practices, and we are committed to developing the strongest sustainability strategy for our combined company.

Another priority for the coming year is to continue to improve the environmental impacts of our products. We believe our photonic integrated circuits change the dynamics of the optical transport network industry by increasing optical performance and reliability while reducing physical size, power consumption and heat dissipation. We are committed to realizing the impact of sustainability considerations in our designs for future products.

While the focus of this report is on the sustainability aspects of our business, I encourage you to visit [www.Infinera.com](http://www.Infinera.com) to learn more, including a more detailed analysis of our financial performance, approach to risk management, and our products and services. We also encourage your feedback on this report, and we hope you will return to find out more about our sustainability progress in the future.

A handwritten signature in dark ink, appearing to read 'Tom Fallon', with a long horizontal line extending to the right.

**Tom Fallon**

Chief Executive Officer

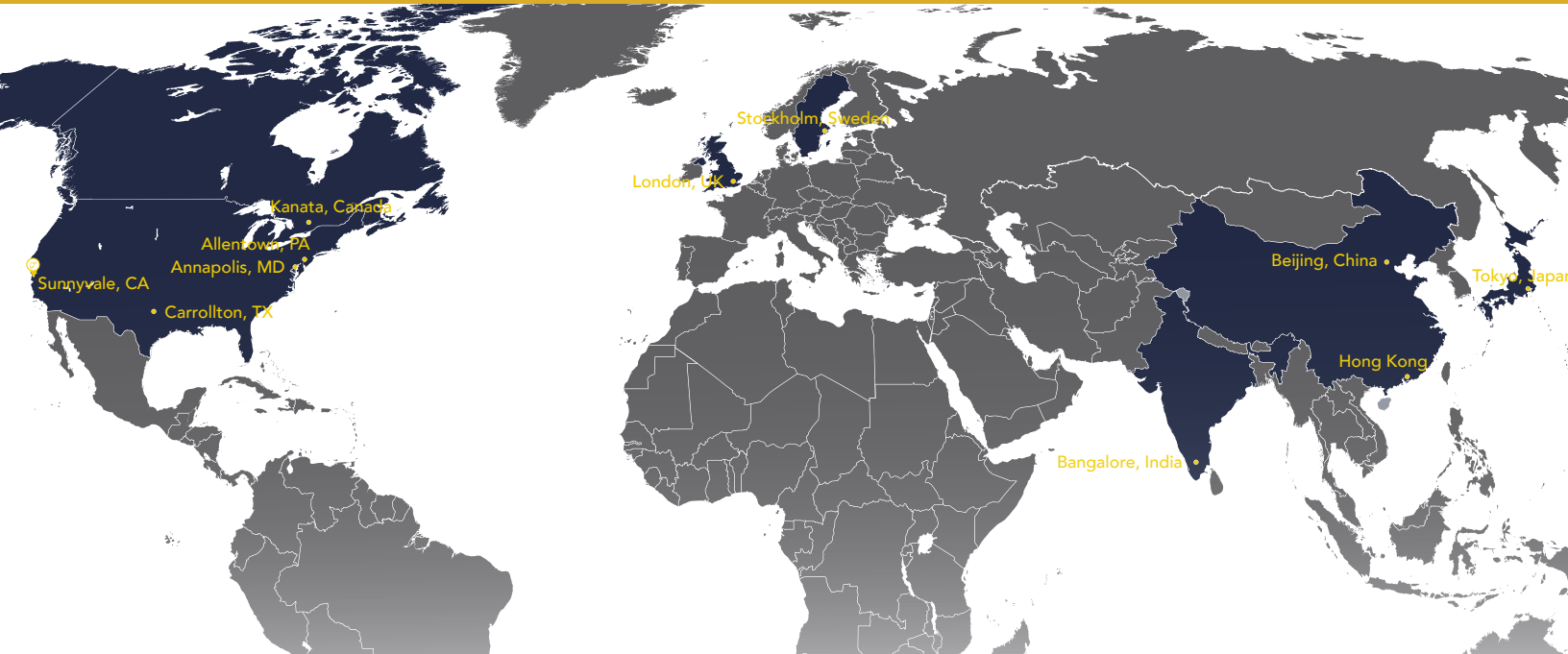


# ABOUT INFINERA

About Infinera

We provide optical transport networking equipment, software and services to telecommunications service providers, Internet content providers (ICPs), cable providers, wholesale and enterprise carriers, research and education institutions, and government entities (collectively, “service providers”) across the globe. Optical transport networks are deployed by service providers facing significant demands for optical bandwidth prompted by increased use of high-speed Internet access, mobile broadband, high-definition video streaming services, business Ethernet services and cloud-based services.

We offer an end-to-end portfolio of packet-optical solutions for metro, long-haul and subsea networks. We believe that when our customers win, we win. Meeting customers’ specific deployment needs and providing industry-leading customer support is in our DNA.



AMERICAS		EUROPE		APAC	
Sunnyvale, CA	Corporate headquarters and manufacturing	Stockholm, Sweden	Research and development, sales, service and support	Hong Kong	Sales, service and support
Allentown, PA	Manufacturing and research	London, UK	Sales, service and support	Tokyo, Japan	Sales, service and support
Annapolis, MD	Research and development, service and support			Bangalore, India	Software development
Kanata, Canada	Research and development			Beijing, China	Research and development
Carrollton, TX	Sales, service and support				



## MISSION

Earn a superior return by enabling our customers to build and operate the world's best optical networks.

## VISION

To enable an infinite pool of intelligent bandwidth that the next communications infrastructure is built upon.

## VALUES

### Drive For Results

We are aggressive in the pursuit of our goals.

### Customer-Centric Focus

The success of our customers is paramount and we will do everything necessary to honestly earn our customer's business.

### Pioneering Spirit

We are courageous and we take risks. We solve problems others are afraid to solve, or can't even see.

### Honesty & Humility

We are committed to hold ourselves to the highest standards of conduct and behavior in every action, interaction, and aspect of our work.

### World-Class Quality

We are committed to ensuring the highest standards of quality in our products, our services and our approach to doing business.

### Teamwork

We are comfortable with cross-functional structures, and regardless of title, we work as a team. We make things happen.

Visit [Infinera.com](http://Infinera.com) for more information on...

- Our board of directors and senior management
- Economic performance and investor relations
- Recent news and press releases



## Products and Services

Information flows through the Internet almost instantly—but we rarely see or think about the infrastructure that makes it possible to seamlessly connect different parts of the world to the global hub. Consumers and businesses expect their data to be available anywhere, anytime, without delay. In fact, the Internet is built on a highly complex network of fiber optic cables that run along the bottom of oceans, through deserts and forests, and under city sidewalks. Long-haul optical networks crisscross continents and oceans, and metro networks connect users to data centers. At their termination, these cables must connect to hardware called optical transport systems that process the optical signal and the data carried within it, ultimately sending it on to the more familiar network of local cables that connect homes and businesses to the Internet. Network operators need to quickly respond to exponential growth in the demand for bandwidth and to have that capacity available to their customers when it's needed. There is a continuing expectation for more bandwidth, which is rapidly changing the way networks need to be built.

### Our Product Lines

We design optical transport systems, ensuring that information flows smoothly from one region to another. Infinitra Intelligent Transport Networks enable carriers, cloud operators, governments and enterprises to scale network bandwidth, accelerate service innovation and simplify optical network operations. Our end-to-end packet-optical portfolio is designed for long-haul, subsea, data center interconnect (DCI) and metro applications. Intelligent Transport Networks make it possible for businesses and consumers to access data and share ideas in real time. We have a complete portfolio of packet optical solutions, solving optical transport needs of network operators from the core to the access.

Our product portfolio consists of the Infinitra DTN-X family of platforms, the Infinitra DTN platform, the Infinitra Cloud Xpress platform, the Infinitra XTM Series, the Infinitra XTG Series and the Infinitra ATN platform addressing subsea, long-haul and metro networks end-to-end. The emerging DCI application is a subset of the long-haul and metro applications. We also provide

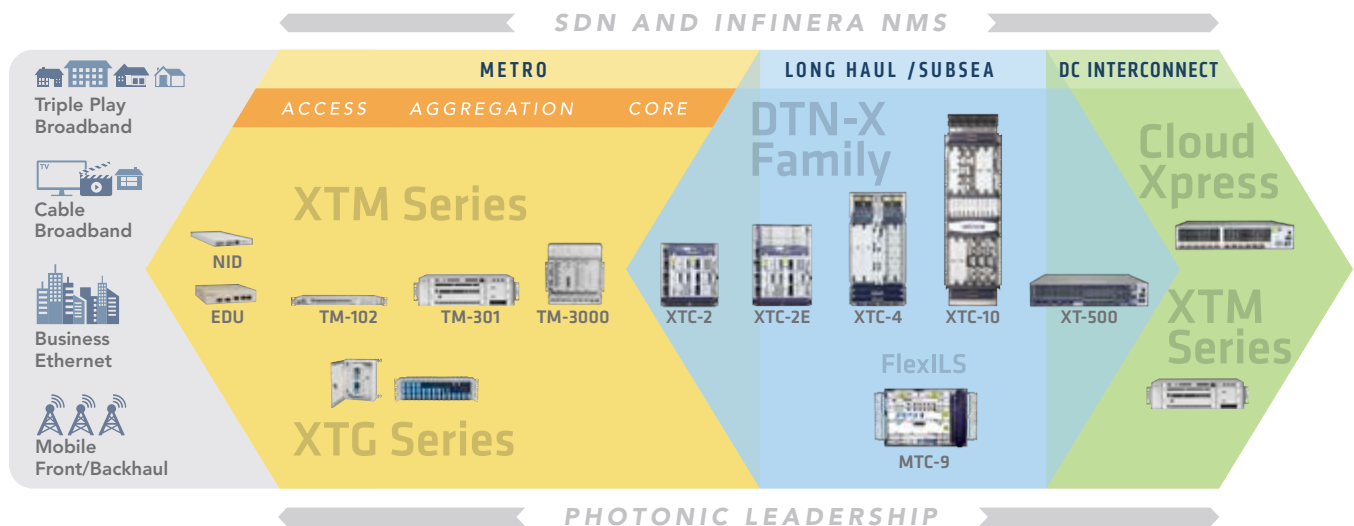
software solutions including the Infinitra Open Transport Switch (OTS) and Infinitra Management Suite (IMS) to increase the efficiency and optimization of the network.

### Our Support Services

We market and sell our products and related support services primarily through our direct sales force, supported by marketing and product management personnel. We also use distribution or support partners to enter new markets or when requested by a potential customer.

In connection with our product offerings, we provide a comprehensive range of support services for all hardware and software products. These support services cover all phases of network ownership, from the initial installation through day-to-day maintenance activities and professional services. Our support services are designed to efficiently manage and maintain customer network operations in the face of today's ever-increasing demands for lower operational costs and minimized downtime.





### Impact on the Industry

We believe that a number of trends in the communications industry are increasing the demand for network bandwidth and ultimately will increase the demand for optical transport networking systems. These trends include growth in bandwidth-intensive services like streaming high-definition video services, the proliferation of 4G and WiFi mobile broadband due to the availability of smartphones and tablets, and the growth of cloud services. As traffic grows, service providers add transmission bandwidth to existing optical networks or purchase and deploy additional systems to keep pace with bandwidth demands and service expansion.

We deliver highly scalable optical networking solutions to support this growing demand for high bandwidth across various end-to-end network locations all the way from the high-capacity long-haul core to the metro access. We manufacture large-scale Indium Phosphide photonic integrated circuits (PICs), which are used as a key differentiating component inside our optical transport equipment, enabling service providers to scale network bandwidth, accelerate service innovation and simplify optical network operations.

The Infinera experience is the union of three complementary pillars: **compelling technology**, **extreme reliability** and a **flexible portfolio of services**.

- **Compelling technology:** Today, only Infinera customers can capitalize on the significant benefits that stem from PIC technology, including ease of operation and life cycle cost savings. Ease of operation results from the elimination of hundreds of discrete components and the reduction of intra and inter shelf fiber patch cords. Fewer discrete components and less fiber complexity results in operational simplicity and ease of installation. Significant savings from reduced space and power are realized over time.
- **Extreme reliability:** More than a decade of comprehensive field quality and reliability data demonstrates that Infinera's composite systems are on average five times more reliable than industry Telcordia benchmarks recommend. It means customers experience far fewer service-impacting events, resulting in higher consumer satisfaction ratings and corresponding revenues.
- **Flexible portfolio of services:** It is our mission to differentiate the Infinera professional services experience from all others, in terms of flexibility, customization and execution in every customer engagement. Our high-touch model for the professional services experience is highly proactive, and we will do whatever it takes to keep our commitment.

Our business has grown significantly over the past 12 years as a result of our exceptional technology, reliability and flexible services. We have products deployed in 72 countries and the supporting infrastructure to service it.

Building on our leadership in long-haul, we now provide an end-to-end portfolio of packet-optical solutions for metro, DCI, long-haul and subsea networks.



### Sustainability Context Through the Value Chain

We act in a global marketplace, where business practices and conditions vary. It is vital, therefore, to identify and minimize risks and capitalize on opportunities along the value chain to build robust operations and business strategies.

As our suppliers are globally distributed, responsible sourcing and managing the social and environmental risks in the supply chain are crucial. We have extensive management systems in place to identify and mitigate risks. See pages 19–22 for more information.

From an environmental perspective, we consider both the environmental impact of our operations as well as the life cycle impacts of our products and services. In particular, we are taking a close look at the potential financial, regulatory and continuity impacts of climate change on our business. The regulatory risks associated with climate change pose a potential financial risk to our business. Changes in fossil fuel taxation, for example,

have led to higher transport and delivery costs. Other risks are flooding, extreme weather conditions and drought that could potentially affect both suppliers and transportation. See pages 21–23 and 28–34 for information about our environmental management programs.

Finally, we want to drive initiatives that benefit local communities and causes as well, as we want to attract and develop the right people to maintain a competitive advantage. We place special emphasis on providing a good working environment and being the employer of choice across all of our global operations. See pages 35–45 for more information on our workplace programs.

## SUPPLY CHAIN

- We rely on a global network of suppliers to provide everything from office supplies and leased office space to semiconductor raw materials and contract manufacturing.
- Key sustainability issues in the supply chain include business ethics, responsible sourcing, product and legal compliance, human rights and labor rights.
- We manage sustainability in the supply chain through a world-class supplier risk management system, a process for tracking/screening conflict minerals, and regular on-site oversight and auditing of key suppliers.

## OUR BUSINESS

- Headquartered in Sunnyvale, California, we have manufacturing, design and packaging facilities in the U.S. and Sweden that maintain robust environmental, health and safety (EHS) programs to ensure compliance with all laws, regulations, and customer specifications.
- We also have design facilities in Canada, China and India, which work closely with suppliers and customers to develop products that meet strict quality and efficiency specifications.
- Our global marketing, services and sales teams are trained to deliver exceptional customer service to ensure that our products are used correctly and to their maximum potential.
- We manage sustainability in our business through strong EHS management systems, data tracking and reporting, business ethics and a focus on continuous improvement.

## PRODUCT USAGE

- Customers include telecommunications service providers, ICPs, cable providers, wholesale and enterprise carriers, research and education institutions and government entities across the globe.
- Products include optical transport networking equipment, software and services that provide a unique combination of highly scalable transmission capacity and easy-to-use bandwidth management tools to simplify transport network operations.
- Key sustainability issues in our products and customer use phase include the environmental impacts of our products, to ensure that they comply with environmental laws and regulations, as well as improving the energy efficiency and longevity of our components.
- We work closely with our customers to ensure that we meet all product specifications, and have invested significant resources into R&D innovation to continuously improve our impact.



# SUSTAINABILITY MANAGEMENT

## Stakeholder Engagement

Many different stakeholders influence our business on a daily basis. We continuously interact with stakeholders through a number of forums and surveys to enhance relations and identify expectations and needs.

Our priority is to address key areas of interest of our key stakeholder groups through our business and sustainability strategy. Our key stakeholders are those with a high level of influence and interaction, and with whom we interact directly and actively in our daily business—customers, employees, suppliers, shareholders and the community. All are crucial in enabling us to achieve our overall targets and sustainability objectives, and if we succeed, it will be mutually beneficial.

In 2015, we built on previous stakeholder engagement dialogue conducted by our metro business. This engagement included

contact with main stakeholder groups through a web-based questionnaire as well as interviews asking them to state their key focus areas. The results from this stakeholder dialogue provided valuable input for our materiality analysis.

In 2016, we will expand our engagement with stakeholders on issues of sustainability, focused on feedback for the following issues:

- Validation of the relevant material issues
- Coverage of relevant topics in a cohesive way
- Emerging issues we should keep on the horizon for future consideration

We look forward to sharing the results of this engagement in next year's report.

STAKEHOLDER GROUP	KEY PRIORITIES	HOW WE ENGAGE
Customers	Product energy performance	Customer surveys
	Environmental impact of products	Personal meetings
	Business practices	Demos
	Responsible sourcing	Seminars and conferences
	Innovation to reduce environmental impact and inspire others	Questionnaires from customers
		Requests for quotation
Employees		Innovation collaborations
	Customer satisfaction	Code of Business Conduct and Ethics
	Employee engagement	Staff meetings
	Product quality and safety	Incident follow up
	Health and safety	Intranet and email
Suppliers	Human rights	
	Transparency and open dialogue	Supplier Code of Conduct
	Business ethics	Evaluations and procurement
	Responsible sourcing	Annual supplier forum
	Labor and human rights	
Shareholders	Innovation and product quality	
	Economic performance	SEC filings
	Business ethics	Interim reports
	Environmental legal compliance	Sustainability Report
	Responsible sourcing	Website
	Risk management	Investor and analyst meetings
Community		Investor conferences
	Compliance with requirements	Environmental reporting
	Corporate governance and risk management	Collaborations
	Economic performance	Media communication and releases
	Innovation and contribution	Certification audits

## Materiality

The concept of materiality, or identifying the sustainability issues that matter most, is used to guide the development of our sustainability strategy as well as the contents of our sustainability communications. Recently, we undertook a formal materiality assessment process that forms the basis of this report.

The first step of the materiality analysis was an internal workshop that involved members of management, and key functions at Infinera, including legal, purchasing, human resources, manufacturing, facilities and marketing. This group evaluated aspects starting with our value chain—both risks and opportunities—covered by the UNGC, the GRI reporting framework, and those aspects that have been emphasized in recent customer surveys. Consideration was also given to the industry and competitors, legal requirements and benchmark of best practices.

The workshop also included closer consideration of who we interact with, to identify which stakeholders are most important in terms of their level of influence and interaction—customers, employees, suppliers, shareholders and community. Participants

in the workshop prioritized material aspects based on their level of actual impact and how they affect the views and decisions of our stakeholders.

Our materiality analysis identified that our key aspects are grouped into four focus areas—business ethics, product responsibility, environmental responsibility and social responsibility. Our aim is to minimize risks and seize opportunities in our value chain. Key aspects per focus area can be found in the chart below.

The outcome of the materiality analysis was validated by members of our management team, including the CEO. The materiality analysis will be reviewed and revised on a regular basis to ensure our priorities are right at all times. This methodology is compliant with the fourth-generation GRI guidelines, with materiality analysis applied to define the scope of sustainability reporting.





Sustainability Governance

The commitment to sustainability is anchored at the highest level of Infinera. Our executive management team sets our corporate sustainability strategy and establishes our sustainability goals. Responsibility for implementing the sustainability strategy reside within the dedicated Corporate Quality & Sustainability team together with respective individual business units and departments. Dedicated personnel throughout the company are trained to manage, monitor and report on sustainability issues.

Our focus in 2015 and in the first half of 2016 has been to establish a more formal process for evaluating and prioritizing sustainability activities. This work will continue in the coming years, including further implementation of sustainability aspects throughout the company. We look forward to sharing the results of our work in subsequent reports.

Sustainability Goals 2016

- To drive performance in each area, we will continue to focus on the following in 2016 and beyond:
- Promoting business ethics and anti-corruption through continued implementation of the Code of Business Conduct and Ethics in our value chain
  - Reducing the environmental footprint of our products
  - Reducing the environmental footprint from our operations
  - Developing working conditions within Infinera to be an attractive employer and to drive initiatives that benefit local communities and causes

Profitable & Sustainable Growth

BUSINESS ETHICS	PRODUCT RESPONSIBILITY	ENVIRONMENTAL RESPONSIBILITY	SOCIAL RESPONSIBILITY/WORKING ENVIRONMENT
Implement Code of Business Conduct and Ethics in the value chain	Increase product power efficiency	Targets for green house gas emissions	Facilities and working environment well positioned for sustainable growth
Establish business amenities and gift policy		Waste reduction	Employee development
		Responsible use of water	Driving initiatives that benefit local community and causes



## Memberships & Associations

We participate in a number of industry associations, trade groups and peer networking organizations—many of which have a special focus on sustainability. Here are a few of the groups we engaged with in 2015:

**United Nations Global Compact (UNCG)** is the world's largest corporate sustainability initiative. The UNGC is a voluntary program that commits companies to align strategies and operations with universal principles on human rights, labor rights, environment and anti-corruption, and to take actions that seek to advance societal goals. Learn more at <https://www.unglobalcompact.org/>.

**American Society for Quality (ASQ)** is a global community of experts and the leading authority on quality in all fields, organizations, and industries. ASQ Silicon Valley is a knowledge-based local community of quality professionals dedicated to the promotion and advancement of quality tools, principles, and practices in their workplaces and in their communities. We have employees who participate on the membership committee of the ASQ Silicon Valley chapter. Learn more at [www.asq.org/](http://www.asq.org/).

**Conflict Free Smelter Initiative (CFSI)** is a program founded by members of the Electronic Industry Citizenship Coalition and the Global e-Sustainability Initiative. The CFSI offers companies and their suppliers an independent, third-party audit that determines which smelters and refiners can be validated as "conflict-free," in line with current global standards. Learn more at [www.conflictreesourcing.org](http://www.conflictreesourcing.org).

**QuEST Forum** is a global association of companies including service providers, suppliers and liaisons, that is dedicated to impacting the quality and sustainability of products and services in the information and communications technology industry. In addition, we are a participant in QuEST Forum's network function virtualization (NFV) initiative, created in 2015 to assess the needs and requirements of organizations developing and offering NFV services, encompassing reliability, performance and security. Learn more at [www.questforum.org/](http://www.questforum.org/).

**Silicon Valley Leadership Group (SVLG)** is a public policy business trade organization representing almost 400 of Silicon Valley's most respected employers on issues, programs and campaigns that affect the economic health and quality of life in Silicon Valley, including energy, transportation, education, housing, health care, tax policies, economic vitality and the environment. We are a proud member of SVLG and our leaders sit on several committees. Learn more at <http://svlg.org/>.

**Women in Photonics, Silicon Valley** is a group started by and composed of women representing the vibrant and diverse work force of Silicon Valley from both industry and academia, specifically in the field of optics and photonics. Its mission is to provide a platform for networking, career growth and development in the field of photonics among women at different points of their career. Learn more at <http://wiphotonics.weebly.com/>.

The background of the slide is a dark blue gradient. It is filled with numerous thin, bright blue lines that appear to be streaks of light or data, radiating from various points. Interspersed among these lines are several semi-transparent, light blue circles of different sizes, creating a sense of depth and movement.

# BUSINESS ETHICS

We are committed to operating with integrity in all of our decisions, in all of our facilities and throughout the business. From our Code of Business Conduct and Ethics to ongoing training for employees, good corporate governance and fair and honest business practices are expected of everyone.

## Fair Business Practices

Our **Code of Business Conduct and Ethics** sets out our commitments to, and expectations for, employees. It covers all operations, subsidiaries, affiliates and related entities worldwide, and covers the following topics:

CODE OF BUSINESS CONDUCT AND ETHICS	
Making Decisions Honestly & Ethically	Compliance with laws, rules and regulations
	Conflicts of interest
	Insider trading
	Corporate opportunities
	Competition and fair dealing
	Payments to government personnel
	Political activities
	Money laundering and funding illegal activity
	Following anti-boycott laws
Protecting Infinera Information & Infinera Assets	Complying with export and import controls
	Record keeping
	Confidentiality
Be Safe & Reliable	Protection and proper use of Infinera assets
	Purchasing policies and supplier relations
	Labor rights
	Human rights
	Health and safety
	Environmental impact

While the Code of Business Conduct and Ethics does not address every possible circumstance an employee might encounter, it does provide guidance for the most common ethical situations. It also outlines the process by which employees may raise concerns about our ethical, social, or environmental practices, including:

- Talking with their local supervisor or member of local management
- Discussing the issue with a Human Resources representative
- Reporting violations or suspected violations to the Legal Department
- Calling our third-party Ethics and Compliance hotline

Our whistleblower policy provides a mechanism for employees who reasonably believe they are aware of conduct that violates our legal duties—including, but not limited to: questionable accounting, internal accounting controls or auditing matters, or the reporting of fraudulent financial information to our stockholders, the government or the financial markets—to raise these concerns free of any harassment, discrimination or retaliation.

Learn more about Infinera's approach to corporate governance, risk management and executive compensation in our proxy statement at [infinera.com](https://www.infinera.com).



## Compliance

We take compliance with laws and regulations very seriously, throughout the company and in every jurisdiction. We had no confirmed cases of breaches to our Code of Business Conduct and Ethics in 2015. In the following table, we report the number of formal grievances and legal claims filed against us, along with their status at the end of 2015.

COMPLIANCE AND GRIEVANCES IN 2015	
Business Ethics	0
Environment	1*
Labor and Human Rights	0
Product Responsibility	0
Customer Privacy	0
Total	0

*Grievances and legal claims may be filed from within the company or from an external source.*

*\*See page 29.*

## Compliance Training

Human resources and Legal work closely together to ensure that our employees have appropriate training on compliance-related issues including our Code of Business Conduct and Ethics and our anti-corruption and bribery policy. We have an online training module that allows managers to assess a new employee's job responsibilities to ensure that the appropriate compliance training is identified and assigned. The employee receives a welcome email with log-in credentials and completes the training electronically. Automatic reminders are sent out for refresher training, and status reports are sent regularly to supervisors for those employees who fail to complete the training in a timely manner.

ETHICAL TRAINING*	ENVIRONMENTAL HEALTH & SAFETY TRAINING*	JOB SPECIFIC TRAINING*
Insider Trading Policy	Universal and Hazardous Waste Training	Root Cause Corrective Action
Foreign Corrupt Practices Act	Injury and Illness Prevention	Electrostatic Discharge Training

*\*Listed in the table are examples of training course in respective areas*



# PRODUCT RESPONSIBILITY

## Responsible Sourcing

Over the years, we have developed a network of suppliers that support our business. We see our suppliers, licensees and their subcontractors as an integral part of our success, and we work to select those who adopt strong ethical standards, respect the rights of their employees and demonstrate stewardship of the environment.

### Supplier Code of Conduct

Our Supplier Code of Conduct sets out the minimum standards expected of our suppliers so they act ethically, responsibly and in compliance with applicable laws and regulations. This code is required to be applied by our suppliers to their first tier suppliers and subcontractors, including providers of contract labor. We expect suppliers to be transparent about their compliance with this code, either through self-assessment and disclosure or through third-party audits. Topics covered in the [Supplier Code of Conduct](#) include:

SUPPLIER CODE OF CONDUCT	
Respect for Human Rights & Labor Rights	Compensation
	Hours of work
	Forced labor
	Young workers
	Harassment
	Nondiscrimination
Health & Safety	Freedom of association
	Providing a safe and healthy workplace
	Health and safety training
Environmental Responsibility	Illegal drugs
	Hazardous substance management and restriction
	Non-hazardous waste management
	Wastewater management
	Stormwater management
	Air emissions management
	Boundary noise
	Environmental permits and reporting
Ethics	Pollution prevention and resource reduction
	Compliance with our Ethics Policy
	Bribery, gifts and favors
	Business records
	Conflicts of interest
	Competition
	Money laundering
	Privacy
Management Systems	Responsible sourcing of minerals
	Commitment to responsible business practices
	Management accountability and responsibility
	Risk assessment and management
	Performance objectives
	Communications
	Audits and assessments

Key suppliers of raw materials and purchased assemblies are screened for compliance with our Supplier Code of Conduct before being added as an approved supplier. In addition, every two years, key suppliers are required to extend their commitment to compliance with the code. At the end of 2015, 98\* percent of these suppliers had renewed their commitment.

In addition to following our Supplier Code of Conduct, key suppliers are also expected to be transparent about the sustainability impacts of the materials and components they provide to us. We require that key suppliers report their greenhouse gas (GHG) emissions to the Carbon Disclosure Project (CDP), disclose on their website sustainability priorities, goals and progress, and cooperate with our efforts to monitor the supplier’s conformance, which includes on-site assessments of their facilities, use of questionnaires and surveys and other measures necessary to allow us to review a supplier’s performance. We reserve the right to disqualify any potential supplier or terminate any relationship with a current supplier that has failed to conform to these standards.

Management and Oversight

We expect our suppliers to conduct their business in a lawful manner, but also in compliance with the same high standards of integrity and ethics that we apply to our own operations. Here are some of the ways that we manage supply chain risk and hold suppliers accountable.

Surveys and On-Site Audits

We use surveys and conduct on-site audits of our major contract manufacturers (CMs) and key suppliers to assess and evaluate their performance on topics including labor conditions, child labor and human trafficking. We consider these principles in the selection of our CMs and suppliers with the intention to actively monitor their compliance through our internal audit program.

Supplier audits are announced and conducted by Infinera at selected supplier facilities using audit protocols in line with the standards of the Electronics Industry Citizenship Coalition’s Code of Conduct and our Supplier Code of Conduct. We believe that employees at supplier facilities have the right to freely choose employment, the right to free association, and the right to be free of harassment and unlawful discrimination.

2015 SUMMARY OF SURVEYS, AUDITS, AND TRAINING	
Number of Supplier Reviews	57
Number of Supplier On-site Audits	19
Suppliers Complying to Infinera Supplier CoC	98%*
Infinera procurement of personnel trained in business ethics	100%
Number of Instances of non-compliance	0
Number of Supplier terminations over ethics / compliance / etc.	0

*\*We work on an on-going basis with all suppliers to be compliant. We qualify alternate sources in the event of non-compliance.*

Annual Supplier Forum

For the past nine years, we have hosted an annual Infinera Supplier Forum (ISF). ISF is where we host senior executives from our key suppliers (for semiconductors, mechanical and optical parts and assemblies from CMs, installation service providers, and key second tier vendors). Speakers from Infinera include our CEO, President, senior leadership, Marketing personal, Operations personnel and on occasion an individual from a key customer. The objective of ISF is to share our vision, key objectives and challenges (including initiatives related to corporate social responsibility directions), as well as allow for direct discussions between our suppliers and Infinera.



### Compliance Across the Value Chain

We are committed to maintaining compliance with all environmental laws and regulations applicable to our operations, products and services. Our business and operations are subject to various federal, state, local and international laws and regulations that have been adopted with respect to the environment. Compliance with these requirements means that we must work diligently with the suppliers who manufacture our products. To date, we have not received notification of any product environmental violations related to the Waste Electrical and Electronic Equipment (WEEE) Directive, Directive on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS), and Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) regulations.

#### RoHS

RoHS regulates the environmental impact of certain hazardous substances in electrical and electronic equipment.

We maintain a robust RoHS program comprising systems, tools and processes to ensure all products meet the EU's RoHS requirements. Our RoHS program is comprised of business systems for product life cycle data management, product governance and compliance processes, supplier certification of compliance, and qualification and audit of CMs.

We accomplished the following in 2015 in an effort to meet our RoHS compliance requirements:

- Updated our database with supplier certification of conformance for over 18,000 parts used in the manufacturing of our products to ensure their compliance.
- Completed audit of three major CMs and numerous component suppliers to ensure the continuation of compliance to environmental regulations through process, system, and training of operators.
- Held regular weekly meetings with CMs and suppliers to maintain a high level of integrity and transparency in product development and manufacturing.

#### REACH

REACH addresses the production and use of chemical substances, and their impacts on both human health and the environment.

We have a comprehensive REACH compliance program in place to help ensure that applicable obligations are met within the specified timeframes. Additionally, we work with electronics industry peers to promote common regulatory and industry approaches to REACH compliance, and in 2015 accomplished the following to upgrade our EU REACH compliance requirements:

- Evaluated substances used in the manufacturing or preparation of products to determine our obligation for registration or communication.
- Identified substances of very high concern that could have been used in our products to determine any reporting and/or communication requirements, as needed.
- Determined the list of chemicals used by the manufacturers of cleaning kits and the chemicals used in the manufacture of our products.

#### WEEE

WEEE aims to prevent electronic waste by promoting reuse, recycling and other forms of recovery. We have systems and processes to manage the requirements of the WEEE regulations such as registration, labeling, reporting, recycling and take-back programs. We are in compliance with all WEEE directives and in 2015 continued to:

- Provide product marking and labeling as required by the WEEE directive.
- Oversee a take-back system and a program for recycling of products in each EU country, as required per local legislations.
- Improve our documentation and reporting system for all products sold into the European Union.

# CASE STUDY: CONFLICT MINERALS

We share international concerns over the conflict in the Democratic Republic of the Congo (DRC) and adjoining countries, where certain conflict minerals are sometimes mined and sold under the control of armed groups to finance conflict characterized by extreme levels of violence. We are working to ensure that the mining of the minerals that end up in our products does not contribute to human rights violations in the region. Our conflict mineral strategy has three main components:

- **Conflict minerals policy:** Applicable to all our suppliers involved in the manufacture of our products, this policy requires suppliers to have a policy in place to reasonably ensure that the tantalum, tin, tungsten and gold in the products they supply or manufacture does not directly or indirectly finance or benefit armed groups in the DRC or an adjoining country.
- **Supplier engagement:** We communicate with our suppliers our requirements for our conflict minerals program. At least once annually, suppliers return their findings on conflict minerals in their supply chain using the Conflict Minerals Reporting Template (CMRT). Following the due diligence framework provided by the Organisation for Economic Co-operation and Development, we follow up with suppliers who provide incomplete or contradictory answers for clarification and provide feedback when necessary on how to improve the quality of their reports.
- **Annual disclosure:** In accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act, we report annually to the Securities and Exchange Commission (SEC) about our conflict minerals program.
- **Grievance mechanism and reporting:** Employees, suppliers, and other affected parties are encouraged to report concerns and reported violations of our conflict minerals policy. Concerns can be reported anonymously, and are covered under our whistleblower protection and non-retaliation provisions.

To read our most recent report to the SEC about our progress on conflict minerals, visit [www.infinera.com](http://www.infinera.com).

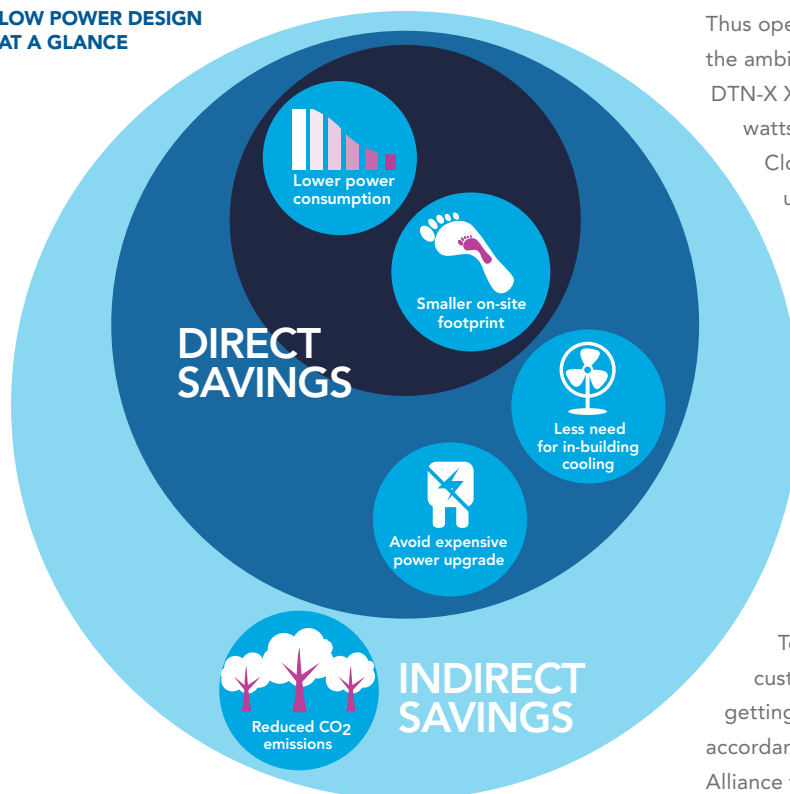
### Greening Our Products

Historically, our customers have made their buying decisions based primarily on the lowest total cost of ownership. As laws and regulations, public policy and corporate purchasing increasingly address environmental sustainability issues, we need solutions that address not just competitive pricing but the overall environmental impacts of our products.

The use of our products and solutions is helping reduce greenhouse gas emissions in two ways. First, we design our products for low power consumption. Running a network is a complex and expensive job, with the cost of energy an ongoing concern. The more efficient we can make the network, the lower the network costs for our customers and the lower environmental impact from use of our products. That's why developing energy-efficient products is at the top of our product development goals.

Secondly, our products enable the efficient use of services such as web conferencing and teleconferencing. By employing these services, we can help achieve the reduction of global travel and its associated negative environmental impact. While harder to measure across our customer base, we believe that our products and technology innovations are a key element of a low-carbon future.

#### LOW POWER DESIGN AT A GLANCE



### Reduced CO<sub>2</sub> Emissions

Higher electricity costs. Limited space. Availability issues. Just a few challenges you face in developing tomorrow's advanced transport networks. In all types of networks—from power-hungry data centers to locations at the edge of the network—the pressure is on to reduce CO<sub>2</sub> emissions.

Our low power design offers a way to meet all of these needs while reducing environmental impact, by providing products and solutions with industry-leading low power consumption—up to 75 percent lower compared with other leading packet-optical solutions.

### Reduced Need for Cooling

Our lower power design means the need for cooling is reduced. Every kilowatt saved in equipment power saves up to 0.5 kilowatt of air conditioning as the system generates less heat.

The Infinera DTN-X family of products have flexible settings to conserve power. For example, the DTN-X XTC-4 system changes the fan rotations per minute (RPM) depending on the ambient temperature. The fan power consumption changes based on the RPM. At the lowest temperature the fan power consumption is 122 watts, while at the highest temperature it is 1753 watts. Thus operators can save up to 93 percent power depending on the ambient temperature using the DTN-X XTC-4. Similarly, the DTN-X XTC-10 has a fan power consumption range from 208 watts up to 3505 watts, saving up to 94 percent power. The Cloud Xpress family can save fan power consumption by up to 76 percent. All this is enabled by the intelligent design of our products.

### Avoid Expensive Power Upgrades

Lower power consumption makes it easier to deploy systems in areas where power is limited. Competing systems have significantly higher power requirements, which require expensive power upgrades in consequence.

### Our Transparency Gives You Power

To make it easier for customers and prospective customers to understand and compare what they are getting, we share detailed power consumption data in accordance with the industry-standard recommendations of the Alliance for Telecommunications Industry Solutions.

### Product Quality and Customer Satisfaction

We have a dedicated team devoted to managing product quality and customer satisfaction, working closely with individual teams, operations, and business units to ensure that our products and services meet the highest level of quality.

We are registered according to TL9000 and apply those requirements to our quality and customer satisfaction by ensuring reviews and surveys for direct customer feedback. Companies certified to TL9000 benefit from a well-defined common standard addressing the telecommunications quality system requirements for design, development, production, delivery, and service.

As a QuEST Forum member company (see page 14), we also benefit from best practice collaboration, quality benchmarking studies, and recognition for promotion of excellence from the leading companies in the information and communications technology sector.

### Product Design and Development

We work closely with our customers to develop design specifications that meet their needs for performance, quality, and compliance. Increasingly, these design specifications call for energy use requirements, restrictions on hazardous substances, and compliance with laws and regulations on conflict minerals.

Once we have a design in place, we create a production plan. This includes selecting parts and components, qualifying suppliers and CMs, and determining production timelines and quality assurance processes.

To mitigate the risk in our supply chain and to ensure that we are positioned to meet our product specifications on time and on budget, we:

- Qualify multiple sources of critical components to spread risk geographically.
- Score suppliers using our proprietary risk tool, which covers aspects including capacity, quality, performance, sustainability, and responsiveness, along with other risk factors like geography, stability, and longevity.
- Conduct additional monthly risk reviews, focusing on key items identified by the risk tool.
- Maintain an electronic database of product specifications that interface with customers and suppliers to ensure a consistent set of expectations and requirements throughout the value chain.



### Quality Manufacturing

We have vertically integrated production facilities, which means that we manufacture our products in factories that we own and operate, giving us excellent control over the entire process.

In some instances, we also use CMs to assemble portions of our products. Each CM procures components necessary to assemble the products in our forecast according to our specifications and bills of material. To ensure we manage risk during manufacturing, we:

- Maintain quality, health and safety, and environmental management system certifications
- Validate manufacturing methods and processes
- Monitor and comply with product specifications and legal and regulatory requirements

### Testing and Quality Control

Despite outsourcing certain manufacturing operations for cost-effective scale and flexibility, we perform rigorous in-house quality control testing to ensure the reliability of our products. To mitigate risk during this phase, we:

- Implement extensive quality assurance and reliability testing
- Establish systems integration and validation requirements
- Conduct testing and validation of software



### Customer Satisfaction and Feedback

Our commitment to product responsibility doesn't stop once our products are installed. To go the extra mile to ensure that our customers are satisfied, we:

- Conduct quarterly operations reviews with customers. These reviews cover specific reliability issues for each customer, services provided to the customer and new products, upgrades and ongoing service provisions.
- Conduct internal reviews, surveying product and service data from deployments to sustaining product through metrics developed collaboratively with customers, customer scorecards and TL9000 metrics.
- Send an annual customer satisfaction survey to a subset of customers. Feedback from these customer satisfaction surveys is tracked internally and communicated across the company.
- Transmit customer requests for enhancements in our products and services into our product and service development life cycle.

### Customer Privacy

We are committed to respecting individual privacy rights and expectations, and to protecting personal data against unauthorized access, use, retention or disclosure. These aspects are considered throughout the value chain as design and development, installation, deployment and sales.

We are not aware of any substantiated complaints about breaches of customers' privacy received from any outside parties or regulatory bodies, or of any leaks, thefts or losses of customers' personal data from breach of customer privacy.

### Supporting Customer Satisfaction Through Technical Training

Technical training is an essential part of Infinera services, ensuring customers and partners worldwide are certified to install, operate, maintain, and troubleshoot our products. Through technical training, the end-users (our customers) gain the skills needed to use our products to optimum efficiency, reduce unnecessary product replacements and extend the life of our products in their network. Infinera technical training is in the midst of a shift from instructor-led curriculums conducted in person that depend on extensive travel and time away from the office, to eLearning and other distance-learning curriculums. This shift results in more customized/focused training, saving time, travel costs, and other infrastructure requirements.

Training is delivered worldwide at either a customer's location; in training labs in Sunnyvale, Baltimore, London, Stockholm, and Hong Kong; or through "live" remote sessions using Lync, Skype, and WebEx. All trainees are given access to eLearning for refresher training and as a support resource.

To ensure the training is of the highest quality, courses are constantly revised to reflect today's market and customer needs, and certification programs are maintained. Using certifications helps ensure that all customers and partners have a verified skill set and knowledge base.

Technical training is provided for all Infinera platforms and is available immediately after product release.

## Awards for Product Innovation

**Optical Network Innovation of the Year Award** was awarded to Infinera for our Cloud Xpress metro optical platform for the Cloud Xpress's unique innovation in high performance data center interconnection. Cloud Xpress was honored as part of Telecom Asia Readers' Choice and Innovation Awards, which are based on the overall quality of innovation and contribution to technology advancement, vision and industry leadership and market acceptance. This is the third year in a row that the Infinera "family" (including Transmode) has been recognized with a Telecom Asia Readers' Choice and Innovation Award, and the second Optical Network Innovation Award in a row.

**Broadband Technology Report's 5 Diamonds/Innovation Award** goes to products that demonstrate game-changing technology and new standards for performance. In 2015, our PT-Fabric got the award for allowing operators to easily grow into a 100G metro network through pay-as-you-go additions.

**IHS (formerly Infonetics Research) named Infinera a Leader in Optical Networking and Data Center Interconnect Market** in its 2015 Optical Network Hardware Vendor Scorecard, as a result of "outstanding customer perceptions, large market share gains and tight finances."

**The Leading Lights** awards highlight the cream of the telecom crop—bestowing awards in categories such as software-defined networking (SDN), NFV and Internet of Things (IoT), and recognizing companies demonstrating innovation at its best in the telecom industry. In 2015, we enjoyed the honor of being named finalist in three award categories: Company of the Year (Public), Best New Product (Telecom) category for the Cloud Xpress and Most Innovative SDN Product Strategy (Vendor) category with the Infinera Open Transport Switch.



# CASE STUDY: SUPPLIER DIVERSITY

Our suppliers are a key element of our mission success, providing impactful innovation in all aspects of company operations and a competitive advantage in the marketplace. We support the use of qualified diverse suppliers, including but not limited to the following certifiable classifications:

- Small Business Enterprise (SBE)
- Women Business Enterprise (WBE)
- Minority Business Enterprise (MBE)
- Small Disadvantaged Businesses (SDB)
- Historically Underutilized Business Zone (HUBZone)
- Veteran Business Enterprise (VBE)
- Service Disabled Veteran Business Enterprise (SDVBE)
- Disabled Small Business Owners (People with Disabilities)
- LGBT Business Enterprise (LGBTBE)

We are dedicated to supplier diversity and are actively involved in organizations and outreach events that include the following:

- **Western Region Minority Supplier Development Council (WRMSDC)** - WRMSDC supports the growth and welfare of minority communities by championing the use of minority-owned businesses in Northern California, Nevada, and Hawaii.
- **National Minority Supplier Development Council (NMSDC)** – The NMSDC is the global leader in advancing business opportunities for certified Asian, Black, Hispanic and Native American business enterprises and connecting them to member corporations.
- **Technology Industry Group (TIG)** - TIG is a forum to bring awareness of supplier diversity to the high tech supply chain. It brings the foremost industry experts from high tech companies together in a setting where knowledge is shared and connections are made.



# ENVIRONMENTAL RESPONSIBILITY

ENVIRONMENTAL RESPONSIBILITY

We are committed to reducing the environmental impact of our operations through energy efficiency, waste reduction, and resource conservation. We have a dedicated team of EHS experts and facility managers who work closely with individual sites to manage environmental risk that consider local and regional concerns.

Our precautionary approach is based on a risk assessment process that identifies, assesses and mitigates environmental risk throughout our operations and supply chain. In the United States and in Sweden, we have environmental management systems registered to ISO 14001. We are considering additional registrations worldwide.

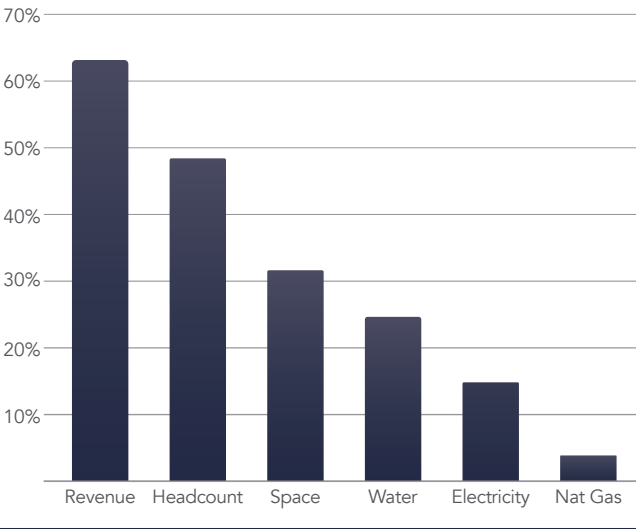
Environmental Legal Compliance

We take compliance with environmental regulations very seriously. We have procedures and processes in place both to identify new and updated legal and other requirements as well as to periodically evaluate compliance with applicable requirements. In addition, we recently undertook a broad review of our programs and operations in Sunnyvale, California using a third-party expert. Changes in legal requirements and operations are incorporated into the annual review of our EHS hazard and risk assessment and calendar of activities.

Even with best efforts directed towards due diligence and regulatory compliance, a perfect compliance record can be elusive. We have had a spotless wastewater discharge record for at least the last five years, with quarterly sampling results showing compliance.

In October 2015, however, we had a single event fluoride excursion from our Sunnyvale semiconductor fabrication plant, a violation under California Hazardous Waste regulations. To prevent recurrence, we voluntarily installed fluoride monitoring equipment closer to the process and made other facility modifications to allow for earlier detection.

Responsible Use of Resources:  
Percent Increase from 2013 to 2015



The above chart summarizes our responsible use of resources. While revenue and headcount have increased by 63 percent and 49 percent, our use of electricity has increased by only 18 percent. Water increased by 24 percent while natural gas has remained essentially flat. We hope to continue this trend as we grow our revenue and business operations. Note: Revenue includes revenue from Transmode since its acquisition on August 20, 2015. Headcount, space and electricity include major sites in California, Maryland, Pennsylvania, India and China. Water includes our site in Sunnyvale, California (biggest use of water) and natural gas includes U.S. sites (no usage in other sites).



## Energy and Climate

We recognize that anthropogenic sources of carbon can contribute to climate change. To identify our risks and opportunities, we measure energy consumption and CO<sub>2</sub> emissions arising from our business each year. Energy consumption has been closely monitored at our facilities for several years to identify areas for improvement. Efforts to increase our energy efficiency are paying off, with a reduction of over 1,000 megawatt hours (MWh) since implementing our energy reduction program.

ENERGY CONSUMPTION (MWh) IN 2015*	
Electricity	28,463
District heating**	3,819
District cooling***	404
Total	32,686

\* Major sites and sales offices included: United States, Sweden, India, China, Canada, United Kingdom and Hong Kong

\*\* District Heating: District heating is a system for distributing heat generated in a centralized location for residential and commercial heating requirements such as space heating and water heating. District heating in Sweden is generated by 86 percent renewable sources.

\*\*\* District Cooling: District cooling delivers chilled water to buildings like offices and factories needing cooling (Sweden).

### Recent Energy Efficiency Highlights

In 2015, we implemented several projects at our Sunnyvale, California facilities to replace inefficient fluorescent lighting with newer LEDs and to upgrade our HVAC systems. These changes are expected to result in annual savings of approximately 600 MWh.

In 2015, our facility in Bangalore, India implemented energy efficiency projects upgrading HVAC systems in labs and LED lighting across three floors. These changes are expected to result in annual energy savings of approximately 1,300 MWh.

In 2014, we implemented several projects at our Allentown, Pennsylvania facility including replacement of inefficient fluorescent lighting with new LED lamps and replacing inefficient compressed air plant and chillers with new high efficiency units. These changes resulted in annual savings of approximately 500 MWh.

## Carbon Footprint

We estimate the carbon footprint of our business in accordance to Greenhouse Gas Protocol Corporate Standard. We have calculated our Scope 1 and 2 GHG emissions for our major operations for several years. In 2015, we started the activity to gather data for Scope 3 emission with the intent to externally publish this data in future sustainability reports.

Scope 1 and 2 calculations are focused on natural gas consumed on-site and electricity purchased from the local grid, process gas, diesel fuel for emergency power generators, and company-owned vehicles. Natural gas usage consistently represents about 5 percent of our combined Scope 1 and 2 carbon footprint. Natural gas is used primarily for heating space and water and is largely consistent year-over-year.

Electricity makes up approximately 95 percent of our combined Scope 1 and 2 carbon footprint and has increased by approximately 18 percent on an absolute basis since 2013. Over that same period our amount of leased space for which the data covers increased by approximately 29 percent.

EMISSIONS BY SCOPE (TONS OF CO <sub>2</sub> EQUIVALENTS [tCO <sub>2</sub> E]) IN 2015*	
Fleet vehicles (S1)	29
Facilities (production gases) (S1)	115
Facilities (energy use) (S2)	12,970
Total emissions	13,114

\*S1 and S2 stand for Scope 1 and Scope 2 according to GHG protocol. The chart above covers our major sites in the United States, Sweden, India, China, Canada, the United Kingdom and Hong Kong.

### CO<sub>2</sub> Emissions Key Performance Indicators (Scope 1 and 2)

Absolute GHG emissions will vary over time and often correspond to the expansion or contraction of an organization. It is useful therefore to use reporting metrics that take these metrics into account and monitor relative GHG emissions intensity.

REFERENCE DATA	KPI*
886,714 thousand USD revenue (\$)	0.0015 tCO <sub>2</sub> e per thousand USD revenue
2056 full-time employees (FTE)	6.38 tCO <sub>2</sub> e per full-time equivalent employee

\*The chart above covers our major sites in the United States, Sweden, India, China, Canada, the United Kingdom and Hong Kong.

## Air Emissions

The semiconductor fabrication facility in Sunnyvale, California is the only site subject to air emissions permitting requirements. Monitoring and reporting of air emissions is also required, including Toxic Release Inventory (TRI) emissions. These results are shared annually on the [U.S EPA's TRI website](#).

## Waste and Recycling

Each of our facilities identifies and implements the most appropriate options for waste diversion and reduction depending on operation and type of waste generated. Production waste associated with manufacturing our products, such as cardboard and paper, scrap metal and foam, is sorted and recycled, with hazardous waste treated and removed by qualified service providers. Our design and sales offices mainly focus on recycling waste items like bottles, cans, and office paper. Qualified external partners are contracted to manage all waste with a focus on recycling and safe management of waste that cannot be recycled in accordance with federal and state regulation.

2015 WASTE GENERATION	
NON-HAZARDOUS WASTE	METRIC TONS
Recycled	205
Compost	10
Incinerated	6
Landfilled	93
<b>Total</b>	<b>366</b>
HAZARDOUS WASTE	METRIC TONS
Recovery	25
Incineration	8
Treatment Offsite	92
Landfill	<1
Other (Universal Waste)	1
<b>Total</b>	<b>126</b>

*This table covers waste generation at our Sunnyvale, California, and Allentown, Pennsylvania facilities.*

## Waste Categories

NON-HAZARDOUS WASTE	
Recycled	Paper, cardboard, plastic bottles and cans and printer cartridges
	Polyurethane and non-polyurethane foam from office, shipping and receiving
Composted	Kitchen waste
Incinerated	Mixed non-hazardous trash
Landfilled	Mixed non-hazardous trash
HAZARDOUS WASTE	
Recovery	Solvent waste (fuel blended or recycled offsite as feedstock)
Incineration	Flammable wipes used in cleaning of equipment
	Corrosive wipes used in cleaning of equipment
Treatment Offsite	95:5(%) Water/Hydrofluoric Acid (HF) from semiconductor fab
	Concentrated acidic waste
Landfill	Wafers and solid material not able to be incinerated
Other	Universal Waste (approved recycle/recovery facility)
	- Alkaline and lithium batteries
	- Fluorescent and high-intensity discharge (HID) lamps
	- Electronic waste (e-waste/universal waste)

# CASE STUDY: WASTE REDUCTION

**Foam Densification:** Two years ago, we installed a foam densification tool to condense the large amount of foam packaging received from suppliers. This new equipment can reduce the packaging material at an 80:1 ratio, taking up less square footage. This reduces the need for frequent foam pickups, eliminating several truck trips each week and reducing carbon emissions associated with transportation of lightweight foam. In 2015 we condensed approximately 5000 pounds of foam into ingots. We reduced the truck emissions from multiple foam pickups by 8:1, and the densified foam now becomes a marketable, recyclable product.



**Composting:** Since opening our new café in a recently-leased Sunnyvale, California building, we have increased our composting by approximately 1,000 pounds per month. This program meets the City of Sunnyvale requirements for cafeteria operations. Prior to that we had a dispersed composting program for office areas that resulted in 1,800 pounds per month. With the increase to 2,800 pounds per month, we are on our way to greater landfill diversion of waste and eliminating methane/GHG emissions from this source if it were to go to landfill.

**Going Landfill-Free:** Our Allentown, Pennsylvania facility is a 100 percent landfill free site; all waste is either recycled or incinerated. A recycling contractor is used for all recycling and universal waste. For 2015, 56 percent of the Pennsylvania facility's waste was recycled, with 44 percent of its waste incinerated for electricity.

Water Management

Semiconductor fabrication requires a significant quantity of water, while offices and design facilities use water in a more limited fashion in kitchens, bathrooms and landscaping irrigation. For that reason, most of our water efforts are focused on maximizing water efficiency at our fab facilities. When the opportunity arises, however, we also take advantage of other opportunities to conserve water.

Over the last several years, we have taken advantage of local utility rebate programs to implement low flow solutions in restrooms and break areas. We continue to evaluate process water opportunities and track water use to identify where additional efforts are needed. Landscape irrigation water consists of city recycled water wherever possible. Since our buildings are leased, we advocate for low water use landscaping with owners and property managers.

Treatment of process water is accomplished by a permitted on-site acid waste neutralization plant and discharged to the municipal sewage treatment system.

WATER CONSUMPTION (CUBIC METERS) IN 2015

Total Consumption	65,936
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*This table covers our major sites and sales offices in the United States, India, Sweden, China, Canada, the United Kingdom, and Hong Kong*

Xeriscaping

In September 2015, due to the ongoing drought in the State of California, we started working on a turf reduction project in Sunnyvale. The project included replacing lawns around buildings with a drought tolerant and more sustainable landscape. It was completed in February 2016. We expect to see a reduction in our potable water usage of 946 cubic meters per year at our semiconductor fabrication building, and a reduction in the use of lawn chemicals and treatments.

Greening Our Facilities

While each of our facilities has dedicated personnel assigned to facility management, we also harness the power and enthusiasm of our employees to help green the way we operate.

Green Teams

In 2011, Infinera created a Green Team with a diverse group of employees at our Sunnyvale, California headquarters. Since then, the team has identified resource conservation improvements including composting, segregation of waste, minimization of water and energy savings. We actively solicit and evaluate employee suggestions and act on them appropriately. The Green Team also issues a periodic newsletter with information for all employees on how to take simple steps—like using online paycheck vouchers and composting in the kitchen—to minimize their environmental impact. In addition, the Green Team provides support and guidance for employees to help them green their personal lives. We have embarked on a series of “green bag” lunchtime meetings open to all employees, with outside speakers on relevant topics.





# CASE STUDY: SMOKE FREE CAMPUS

We are smoke-free at all of our facilities. This is particularly important at our corporate headquarters in Sunnyvale, California due to our proximity to the San Francisco Bay Estuary. Save the Bay estimates that over three billion toxic cigarette butts are littered in the Bay Area each year, threatening water quality and wildlife in the Bay. To address this, we have placed signs on short trails leading to flood levees that hold back tidal wetlands connected to the South Bay Salt Ponds and channels. For those individuals who do smoke, we provide receptacles for their refuse and regularly keep track of known smoking areas that are off-property for cleanliness and proper use.

## Green Building Features

Our building managers continually investigate and implement energy-saving opportunities throughout our locations. We have implemented many projects, resulting in over 1000 MWh saved over the last 18 months at our California and Pennsylvania facilities. These savings are tracked and verified in order to ensure effectiveness. The projects include a new building management system, retrofitting light fixtures with LED lamps, retro-commissioning building infrastructure to optimize performance, and deploy the use of hot aisle – cold aisle environments for our labs. We are also preparing to participate in the EPA's Energy Star Program to track and compare our energy use with other facilities in order to achieve best-in-class efficiency. We will continue to investigate and implement opportunities for improvement at all of our facilities.





# SOCIAL RESPONSIBILITY

We believe a connected world is a better world. But connection in and of itself is not enough. Those connections need to foster mutual respect, appreciation of ideas and the lifting up of those most in need. In our realm of social impact, there has to be movement toward sustained relationships and betterment within our global community.

### Our Workforce

We have grown rapidly, going from 1,318 to 2,056 employees in the last two fiscal years. The advancement and expansion of our business, products and service offerings places a significant strain on our management, and operational and financial resources. To manage any future growth effectively, we must continue to improve and expand our information technology and financial infrastructure, our operating and administrative systems, and our ability to manage headcount and processes in an efficient manner.

With thousands of employees and contractors around the world, our core value of teamwork is a critical aspect of our success. As our company continues to grow, we are working hard to ensure that the Infinera culture, which emphasizes collaboration and innovation, is embedded into every effort and operation.

Our strategy ensures our success through attracting, retaining and developing the top talent in our industry, all with an emphasis on excellence, transparency and contributing to a dynamic and engaging environment.

### Diversity and Inclusion

We are committed to providing employees with a non-discriminatory work environment that promotes open and honest communication and embraces dignity, respect and diversity in all aspects of our business operations.

#### Discrimination and Harassment

To maintain our culture of diversity, all employment decisions are based on a principle of mutual respect and dignity for one another, as well as compliance with local laws.

Our equal employment policy prohibits discrimination on the basis of gender, religion, age, origin, sexual orientation or functional disability, as well as any other legally protected class.

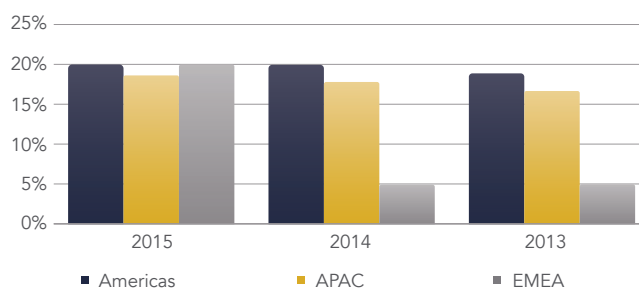
Harassment can come in many forms, including physical actions, verbal or written remarks, or visual depictions. We strictly prohibit any acts of harassment, whether by an employee or a non-employee, and require regular training to ensure managers are aware of what constitutes harassment.

### Employee Diversity

Employees are our most important resource and the basis for our success. We seek an environment characterized by respect for the individual, where cultural and ethnic diversity are blended by teamwork into a harmonious work force. We are proud to have more than 60 native languages in our organization, spanning a spectrum of employees with very diverse social and professional backgrounds.

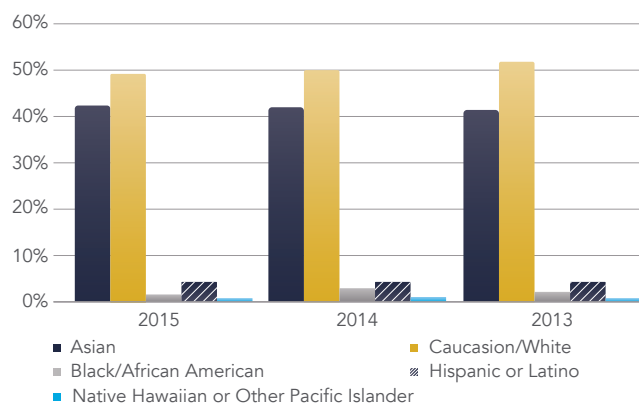
We are required to put into place an affirmative action plan at each of our U.S. locations. This plan includes equal employment opportunity to ensure the rights of each person in all actions, including recruitment, selection, training, compensation, promotion, and recreation, all of which shall be based upon individual ability, interests and performance.

#### Gender Diversity Percent of Women



The increase in female workers in Europe from 2014 to 2015 is a result of the Transmode acquisition.

#### Race and Ethnicity



Because race and ethnicity categories differ between countries, as do laws regarding tracking of employee racial association, we only report this diversity data in our U.S. facilities, where the majority of our employees are located. Human Rights and Labor Rights

### Human Rights and Labor Rights

We support and respect internationally proclaimed human rights, including the principles reflected in the Universal Declaration of Human Rights issued by the General Assembly of the United Nations. We are always seeking new ways to demonstrate our commitment and dedication to ethical practices. To that end, we publicize our internal standards and our supplier requirements, including but not limited to the policies outlined below:

- Code of Business Conduct and Ethics
- Supplier Code of Conduct
- California Transparency in Supply Chains Act (SB 657)
- Conflict Minerals Policy
- Purchasing Ethics Policy

We further support the elimination of all forms of forced, bonded or compulsory labor. We do not recruit child labor and support the elimination of exploitative child labor.

We support the right to freedom of association, and until late 2015 none of our employees were covered by collective bargaining agreements. With the acquisition of Transmode in 2015, our site in Sweden has 100 percent of its workforce covered by a collective bargaining agreement. In facilities where workers are not unionized, we have mechanisms in place to ensure that workers have a voice in operational decision-making.

In our manufacturing plants, there are a number of EHS meetings and committees that involve employees. We seek to provide adequate notice to employees in advance of any significant changes to our operations.

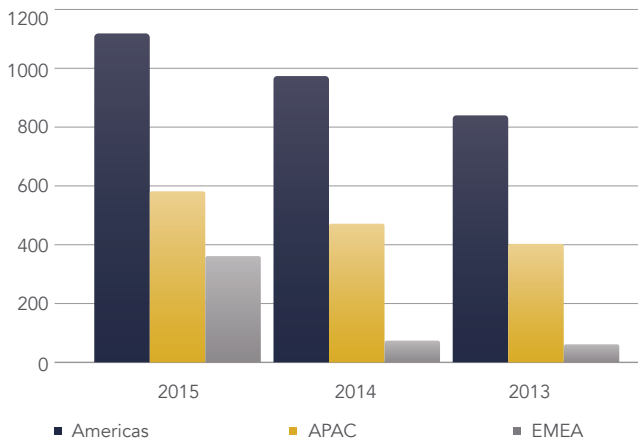
We provide the appropriate levels of transparency and notice based on organizational change, labor standards per region

and by country, or where specified in collective bargaining agreements. For example, our site in Sweden provides notice for operational changes according to its CBA Teknikavtalet with a minimum of four weeks (maximum 52 weeks). Notice periods and provisions for consultation and negotiation are specified in the collective bargaining agreement.

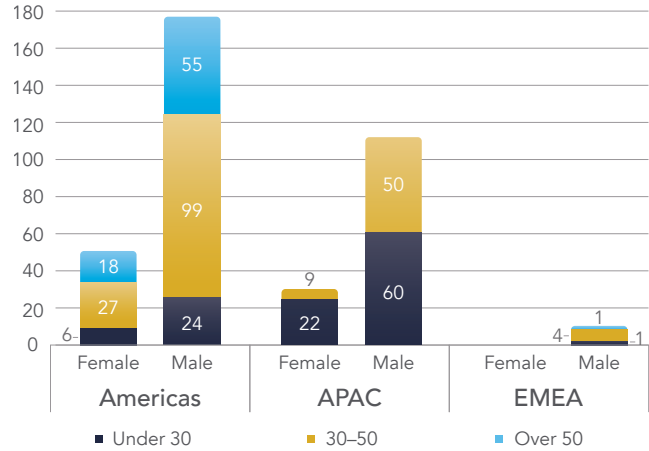


2015 Facts & Figures

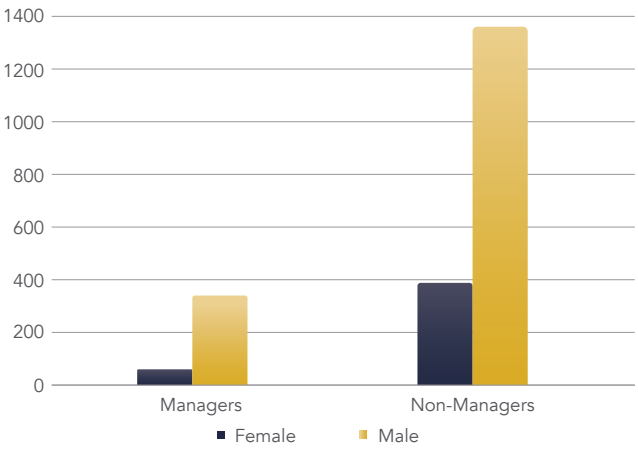
Our Employees



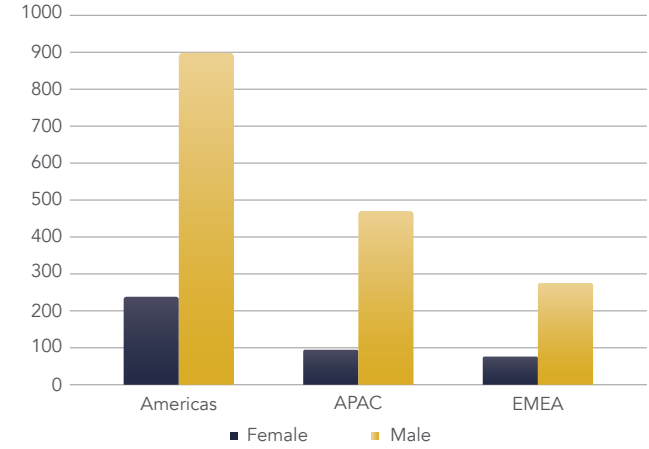
Hires by Age Group, Region & Gender



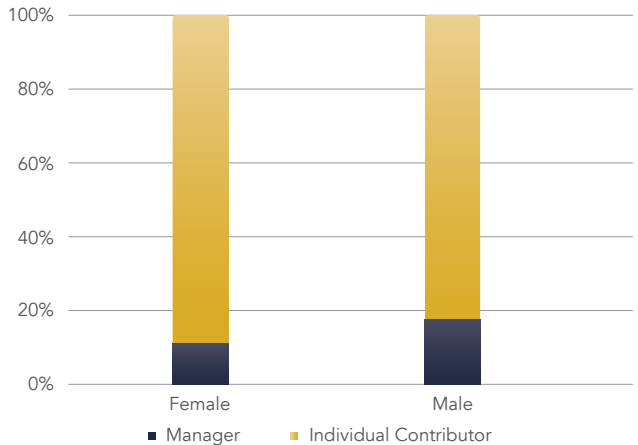
Employees by Management Level & Gender



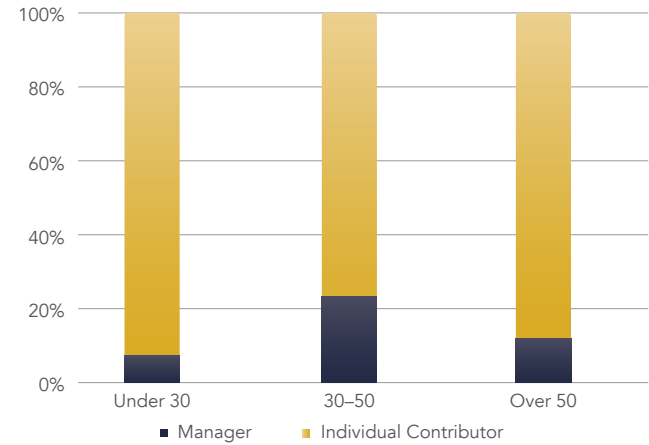
Employees by Region & Gender



Employee Category Percent by Gender



Employee Category Percent by Age Group



Health and Safety

We are committed to providing all employees with a healthy and safe work environment by preventing accidents and improving physical and psychosocial conditions. Our health and safety programs focus on the following elements:

- Accountability:** Each employee is responsible for maintaining a healthy and safe workplace by following health and safety rules and practices, and reporting accidents, injuries, and unsafe equipment, practices or conditions.
- Conduct:** We do not tolerate violence or threatening behavior. Employees should report to work in a condition to perform their duties, free from intoxication due to drugs or alcohol. The use of illegal drugs in the workplace is never permitted.
- Compliance:** We comply with relevant health and safety regulations everywhere we operate.

Management Systems

We maintain an OHSAS 18001-certified safety management system in our Sunnyvale, California and Allentown, Pennsylvania facilities, which helps us identify, manage and continuously improve safety risks and performance across all of our activities through:

- Safety policies that outline requirements and expectations
- Standard operating procedures (SOPs) that provide detailed instructions for safely completing tasks
- Audits and corrective action plans to identify and redress health and safety gaps
- Detailed data tracking and reporting to measure performance over time

Health and safety is a top priority, particularly in our manufacturing operations, which involve an elevated safety risk for certain tasks. We have a dedicated team of EHS professionals that oversees all aspects of EHS for the company, with the help of local representatives at each site. EHS programs are implemented throughout the company based on the site’s individual risk assessment. At sites with significant health and safety impact, risk assessment is further detailed through recognized methods such as job hazard analysis.

Safety Training

Training is based on the specific hazards of the job. Jobs are categorized, and each category is assigned a predetermined list of EHS classes in a Learning Management System (LMS) managed by our Human Resources department. For example, required safety classes might include topics like chemical safety, laser safety, electrical lock out/tag out, forklift training, and office or industrial ergonomics.

Our emphasis on the importance of ergonomics stems from our heightened awareness of the physical implications of any repeatable task that our employees undergo in their daily jobs. Our ergonomic concerns range from the typical office ergonomics to industrial ergonomics. We have measures in place to address our ergonomic issues, from educating our employees to mandatory ergonomic training to information sessions. Additionally, we conduct ergonomic evaluations both in-house and by an ergonomic specialist—either as a follow-up to a concern, or as requested by the employee.

Emergency Preparedness

We have trained Emergency Response Teams at all locations. For example, we have a trained team who is certified by the State of California’s Emergency Management Agency to respond to all on site emergencies involving hazardous materials. At our other sites that have hazardous materials, we have Medical Emergency Response Teams that respond to medical emergencies that may arise.

SAFETY PERFORMANCE IN 2015	
Fatalities	0
Number of OSHA Recorded Cases	3
Number of Lost Time Injury Cases	1
Number of Restricted Work Day Cases	1

*This table covers U.S. employees only. At this time, we do not track health and safety data by gender.*





# CASE STUDY: SAFE HANDLING OF CHEMICALS

The use of hazardous materials is a necessity in a semiconductor fabrication facility. With the use of hazardous materials comes the responsibility to “engineer out” potential exposure to employees and the public. With this in mind, we have established multiple levels of control, with reliance on automated bulk chemical delivery systems supporting the safety of our operators. With proper facility and process design, we ensure the safe use and handling of all hazardous materials.

Engineering controls reduce the risk of employee exposure, regardless of hazard level and the physical state of the chemical. If substitution with a less hazardous chemical is not an option, we reduce risk by minimizing the number of steps that require manual chemical handling. To achieve this, we have built a state-of-the-art Bulk Chemical Delivery room. Ample ventilation and containment for the room itself is only the beginning. Inside the room, there are enclosures with additional ventilation, containment, and controls.

With an automated closed system for chemical delivery, human interaction is minimized. This ensures that even the most toxic or corrosive chemicals are managed safely without the hazards involved with manual handling.

- Employers are required to maintain Material Safety Data Sheets (MSDS) for all the chemicals on-site
- MSDS are located in binders in each of the buildings with chemicals, and all MSDS documents are also available electronically
- Chemical purchases must go through a formal review process to evaluate safety and environmental impact

## Development and Engagement

We believe in the value of continuous learning and professional growth. Whether it's encouraging employees to share their candid feedback about working for the company through our Culture Survey, our Executive Suggestion Site, or on public forums such as Glassdoor.com, or ensuring that all employees have access to informal and formal learning opportunities, we know that our evolution as an organization is underpinned by the evolution of our people.

In 2015, while every employee took part in a learning activity, we recognize that the pressures of rapid growth and the disconnect between learning activities and impact were barriers for many employees. Yet we were pleased to learn that our limited program offerings did not diminish strong organizational indicators of an engaged workforce. Eighty-eight percent of employees surveyed would recommend working at Infinera to a friend (which is supported by our sourcing statistic that 33 percent of our new hires were referred by an Infinera employee) and 94 percent of employees are proud to work for Infinera.

In 2015, we invested in a global function leader who is focused on expanding the way we think about learning and ensuring that every employee has ready access to learning activities that will have the greatest impact on their development. We conducted our first Learning and Organization Development survey to better understand how employees experience Infinera from the perspective of opportunity to master skills, autonomy, purpose, collaboration and how they experience our values. The results of the survey have been shared with senior management and used to shape our priorities for 2016 and beyond.

### Employee Career Development

We offer a variety of opportunities to guide employees on their career journeys. We believe individuals should play an active role in their own career development to achieve their professional goals. Because we realize that experiential learning is the most powerful type, we focus on providing new job-based learning opportunities, such as new projects, cross-functional transfers, expanded roles and relocations to other geographies.

New employees are introduced to Infinera through an orientation program, where they receive an overview of our industry, products, and culture.

Our Summer Scholar development program for high school seniors and college freshman provides job-specific skills, mentoring, peer networking opportunities, and a holistic understanding of our business.

### Training

Starting in 2011, we launched our first formal development training program. In 2014, we expanded this program to all offices and all employee levels. Available development training includes: Infinera Influencer, Powerful Presentations, Mastery of Mindset and many more. The session topics were specifically selected based on the preferences of employees across the company. In addition, we offer monthly information sessions where employees can expand their knowledge of the business and departments outside their own.

From a formal learning perspective, nearly all of our employees have taken part or have had the opportunity to participate in some sort of formal development in 2015, including leadership coaching, instructor-led training, and eLearning. On average, employees received 4.1 hours of formal learning, including compliance training. Metro Sweden employees are not included in these figures.

LEADERSHIP AND DEVELOPMENT COURSES FOR MANAGERS	"LUNCH AND LEARN" INFO SESSIONS	COURSES AND PROGRAMS FOR EMPLOYEES AT ALL LEVELS
Leadership through coaching	Evaluation, acquisition and integration	Infinera influencer
Managing within the law	Our stock and investor relations strategy	Mastery of mindset
Leadership effectiveness	Five tips to getting your emails noticed	Powerful presentations
Transitioning from individual contributor to people manager	How to negotiate anything	Meditation
Executive coaching	Understanding our earnings report	Project management
Coaching conversations		Managing time and priorities
		Effective communication
		Work style analysis: individuals and teams
		Toastmasters club



### Learning Management System (LMS)

In 2015, we made a significant investment in a sophisticated LMS. Our first use phase for the LMS has been “core training” to automate product training for our workers and customers, and to automate business ethics, safety and compliance training for workers. As we onboard employees in manufacturing and engineering jobs, we are planning a knowledge management use case to automate their training on our manufacturing and engineering processes and systems.

Our next use phase will be to build a repository of internal and external learning opportunities—from brief videos to live classes—that are linked to a handful of competencies that are crucial to the effectiveness of individuals and the organization. These competencies include business acumen, building relationships, cross-functional collaboration, scaling, communication and leading teams.

### Employee Coaching

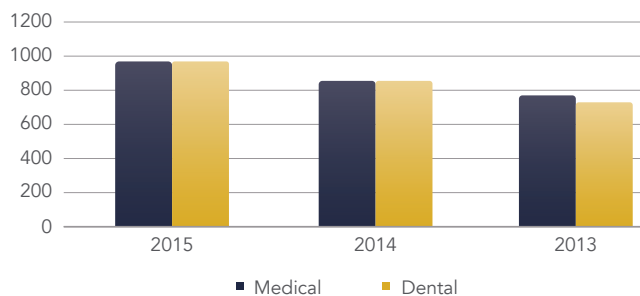
We believe that once-a-year performance evaluations aren’t enough. We encourage management and our employees to engage in more frequent and regular dialogue and to engage in an interactive process to provide timely recognition and feedback on an ongoing basis. The Infinera POWr (Position, Outcomes, Way Forward, and revisit) model shifts the performance focus from a one-time annual event to a process that builds relationships with transparency and better alignment within the teams and departments. Our “Coaching Conversations” are two-way discussions intended to drive outcomes in a rapidly shifting environment.

The transition to “Coaching Conversations” was embraced by the company in 2011. Through our annual trainings and HR guidance, we develop our managers into stronger leaders who are comfortable having healthy exchanges with their employees, and teams that focus on solutions. In turn, employees are encouraged to discuss career aspirations and ideas with their managers or a mentor on a bi-annual basis. The “Career Conversation” is intended to broaden an individual’s skills and knowledge. This is an opportunity for employees to discuss their career interests and to review activities and progress.

### Wages and Benefits

Our goal is to provide our talent with a total compensation package competitive with the market. Total compensation includes base salary, bonus and equity awards (for eligible employees). Factors such as internal and external comparisons, individual employee performance, potential, and unique skills or knowledge required for the success of the company affect the composition and level of total compensation for each employee.

### Employee Participation in U.S. Employer-Sponsored Benefits



### U.S. Benefits

All regular full-time employees and regular part-time employees who work 30 or more hours per week are eligible for all Infinera benefits. All regular part-time employees who work between 24 hours and 29 hours per week are eligible for partial benefits. Part-time employees working fewer than 24 hours per week will be eligible for such benefits as are legally required.

### Health Insurance

Health insurance is one of the most critical benefits offered at Infinera. Our goal is to offer comprehensive benefits while minimizing costs for our employees and for Infinera.

We currently provide a comprehensive health benefit program, which includes medical, dental and vision plans for eligible employees and their dependents. We currently pay the majority of the cost of such health benefit coverage for employees.

Employees in the United States are offered a choice of health plans including medical, dental, and vision. Employees may also enroll in a Flexible Spending Account for healthcare, dependent care, and commuter costs. The cost of basic life, accident, disability insurance, and Employee Assistance Plan (EAP) is employer-paid.

Offering a choice of medical plans allows our employees to choose a plan that best suits their needs. Among the choice of medical plans, most employees have opted to enroll in a PPO plan, which allows for flexibility when choosing a physician and hospital.

### 401(k) Retirement Plan

We offer a 401(k) Retirement Savings Plan to our U.S.-based employees. Employees are eligible to enroll as of their hire date and contribute a percentage of his or her salary up to the maximum limit imposed by the Internal Revenue Service. In 2015, we implemented an employer match. Our 2015 401(k) participation rate was 75 percent.

### Global Operations

Our goal is to provide market-competitive benefits as part of our total reward structure to ensure peace of mind for all global employees and their dependents. Our primary coverages pertain to private medical coverage, life insurance, and various forms of accident or disability coverage. We strive to provide these coverages 1) where they are legally required, 2) where group and individual plans can be obtained, and 3) to be market-competitive.

These coverages can be found in all major regions including the United States, Sweden, Canada, the United Kingdom, India and China. Additionally, many of these coverages are in places across the rest of the Americas, EMEA and APAC. Benefits may differ based on location, statutory requirements and local customary best practice.

### Wellness Programs

We promote and support the health, safety, and well-being of our employees. Through our wellness program, employees may participate in several team sports, a variety of fitness challenges, attend information sessions on nutrition, financial wellness and healthy living. For employees who do not have access to the on-site fitness centers, we offer a reimbursement subsidy for gym membership.

Employee Recognition

We are proud of our talented and hardworking team. Our standards and expectations are high, but from time to time individual contributors or sometimes a team of people will perform above and beyond our own high standards and are worthy of special recognition. That recognition can come in a multitude of ways:

- A personalized thank you – whether this be in a one-on-one meeting or through an email or team meeting
- Personalized gifts that are selected to suit each individual’s interests by managers who know what each person enjoys on a personal level
- “You Rock” awards – for any employee to recognize anyone that has gone above and beyond
- Spot bonuses
- Guiding Light Awards spotlighting employees who exemplify Infinera values
- Round of Applause – our Team Recognition Award to celebrate a new “Infinera Moment of Magnificence”
- Five and 10 year awards to recognize longtime employees
- Annual events such as picnics, Take Your Kids to Work Day, afternoon socials, quarterly lunches, and corporate achievement celebrations

NUMBER OF YOU ROCK AWARD RECIPIENTS	
2015	800
2014	677
2013	573

Community Engagement

We actively support the communities in which we operate and encourage our employees to do the same. Through our Community Fund, company-sponsored volunteering opportunities, and donation matching, Infinera is fulfilling our commitment to be a good corporate citizen. We believe that our net impact on communities in the areas where we operate is positive.

Community Fund

In 2010, we launched the Infinera Community Fund (ICF) and its all-employee volunteer team. ICF’s mission is to foster mutual respect, appreciation of ideas and the lifting up of those in need through employee-run events and initiatives in our local communities. We want to support the causes that matter most to our teams, empowering them to make a difference in their surrounding neighborhoods and the world at large.

ICF has over 50 members throughout our offices. We encourage employees to work and engage with non-profit organizations in their local areas to help benefit the community we live and work in.

ICF offers employees an active internal portal dedicated to helping them find ways to give back in their local communities. There are areas for employees to learn about current company volunteer opportunities and team-building events, and submit matching fund requests. There are also photo galleries to view past events and fundraising activities.



## SOCIAL RESPONSIBILITY

### ICF Sunnyvale Event: Bike Build for the Boys and Girls Club

In April 2015, different departments in our Sunnyvale, California facility came together for our first Bike Build event. One hundred employees participated in the event, which challenged 10 teams against each other in friendly games and competition to win bike parts, which were then assembled into bicycles. In a surprise appearance, children from the San Jose Boys and Girls Club chapter met the Infinera team and were presented with their new bikes.

### Volunteerism

ICF organizes quarterly volunteer events for employees and contractors to have an opportunity to give back to the community with their coworkers. Volunteers receive paid time off to participate in these events, which are scheduled during the normal workday. Organizations we support include:

- [Reading Partners](#)
- [We teach science](#)
- [Citizen Schools](#)
- [Year Up](#)
- [Second Harvest Food Bank](#)
- [Sacred Heart Community Service](#)
- [Family Giving Tree](#)
- [HandsOn Bay Area](#)

### Donation Matching

We also support local causes with regular employee matching donations. ICF offers a quarterly fund-matching program. Employees can apply and the committee will review their application to make sure that it fits within the guidelines. Once the funds are approved, the committee sends the matched funds to the non-profit organization. Each employee can have funds matched up to \$500 a year.





# UNGC & GRI CONTENT INDEX

PRINCIPLE #	UNGC PRINCIPLE	PAGE NUMBER
1	Businesses should support and respect the protection of internationally proclaimed human rights	16, 19, 36–37
2	Business should make sure that they are not complicit in human rights abuses	17, 20, 22
3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	16–17, 19–20, 37
4	Businesses should uphold the elimination of all forms of forced and compulsory labor	16–17, 19–20, 37
5	Businesses should uphold the effective abolition of child labor	16–17, 19–20, 37
6	Businesses should uphold the elimination of discrimination in respect of employment and occupation	16–17, 19–20, 37–38
7	Businesses should support a precautionary approach to environmental challenges	29
8	Businesses should undertake initiatives to promote greater environmental responsibility	28–34
9	Businesses should encourage the development and diffusion of environmentally friendly technologies	23
10	Businesses should work against corruption in all its forms, including extortion and bribery	16–17, 19–20



We are a proud member of the UNGC, a voluntary initiative based on CEO commitments to implement 10 universal sustainability principles on human rights, labor, the environment and anti-corruption, and to take actions that advance societal goals.

This report explains our progress in implementing the UNGC principles, cross-referenced in the adjacent table.

We report on our sustainability efforts according to GRI Guidelines according to “In accordance – Core” level. This report has not been externally assured. The GRI content index includes General Standard Disclosure Items and Specific Standard identified as material in our materiality analysis.

GRI INDICATOR	DESCRIPTION	PAGE NUMBER
STRATEGY AND ANALYSIS		
G4-1	Statement from CEO	3
ORGANIZATIONAL PROFILE		
G4-3	Name of the Organization	2
G4-4	Primary Brands, Products and Services	7–8
G4-5	Headquarters Location	5
G4-6	Countries of Operation	5
G4-7	Ownership and Legal Form	2016 Proxy
G4-8	Markets Served	7–8
G4-9	Scale of the Organization	5, 8
G4-10	Workforce Profile	36–38
G4-11	Collective Bargaining Agreements	37
G4-12	Supply Chain	9
G4-13	Significant Changes During the Reporting Period	3
G4-14	Precautionary Approach	29
G4-15	Environmental Economic Charters, Principles and Other Initiatives	14
G4-16	Memberships and Associations	14
IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES		
G4-17	Entities Covered in Financial Statements	2016 10-K
G4-18	Process for Defining Report Content	12
G4-19	Material Aspects	12
G4-20	Aspect Boundaries within the Organization	12
G4-21	Aspect Boundaries Outside the Organization	12
G4-22	Restatements	N/A
G4-23	Significant Changes Since Last Reporting Period	N/A
STAKEHOLDER ENGAGEMENT		
G4-24	Stakeholder Groups	11
G4-25	Basis for Identifying Stakeholders	11
G4-26	Approach to Stakeholder Engagement	11
G4-27	Key Topics Raised Through Stakeholder Engagement	11
REPORT PROFILE		
G4-28	Reporting Period	2
G4-29	Date of Most Recent Previous Report	N/A
G4-30	Reporting Cycle	2
G4-31	Point of Contact	2
G4-32	"In Accordance" option	2
G4-33	External assurance	2

GRI INDICATOR	DESCRIPTION	PAGE NUMBER
GOVERNANCE		
G4-34	Governance Structure	2016 Proxy
ETHICS AND INTEGRITY		
G4-56	Values, Principles, Standards and Norms of Behavior	6
ASPECT: ECONOMIC PERFORMANCE		
G4-DMA	Generic Disclosures on Management Approach	2016 10-K
G4-EC1	Direct Economic Value Generated and Distributed	2016 10-K
G4-EC2	Climate Change Risks and Opportunities	9
G4-EC3	Coverage of the Organization's Defined Benefit Plan Obligations	2016 10-K
ASPECT: INDIRECT ECONOMIC IMPACTS		
G4-DMA	Generic Disclosures on Management Approach	44
G4-EC7	Development and Impact of Community Investment and Support Services	44
G4-EC8	Indirect Economic Impacts, Including the Extent of Impacts	44
ASPECT: ENERGY		
G4-DMA	Generic Disclosures on Management Approach	30
G4-EN3	Energy Consumption	30
G4-EN5	Energy Intensity	30
G4-EN6	Energy Reduction (Organization)	30
G4-EN7	Energy Reduction (Products)	23
ASPECT: WATER		
G4-DMA	Generic Disclosures on Management Approach	33
G4-EN8	Water Use	33
ASPECT: EMISSIONS		
G4-DMA	Generic Disclosures on Management Approach	30–31
G4-EN15	Direct Greenhouse Gas (GHG) Emissions (Scope 1)	30
G4-EN16	Energy Indirect Greenhouse Gas (GHG) Emissions (Scope 2)	30
G4-EN18	Greenhouse Gas (GHG) Emissions Intensity	30
ASPECT: EFFLUENTS AND WASTE		
G4-DMA	Generic Disclosures on Management Approach	31–32
G4-EN23	Waste Generation	31
G4-EN24	Spills	29
G4-EN25	Hazardous Waste	31
ASPECT: PRODUCTS AND SERVICES		
G4-DMA	Generic Disclosures on Management Approach	23
G4-EN27	Environmental Impacts of Products and Services	23
ASPECT: COMPLIANCE		
G4-DMA	Generic Disclosures on Management Approach	17, 29
G4-EN29	Environmental Fines and Sanctions	29

## UNGC & GRI CONTENT INDEX

GRI INDICATOR	DESCRIPTION	PAGE NUMBER
ASPECT: SUPPLIER ENVIRONMENTAL ASSESSMENT		
G4-DMA	Generic Disclosures on Management Approach	19–20
G4-EN32	Supplier Environmental Screening	19–22
ASPECT: ENVIRONMENTAL GRIEVANCE MECHANISMS		
G4-DMA	Generic Disclosures on Management Approach	17
G4-EN34	Environmental Grievances	17
ASPECT: EMPLOYMENT		
G4-DMA	Generic Disclosures on Management Approach	36–44
G4-LA1	Employee Turnover	36, 38
G4-LA2	Benefits	42–43
ASPECT: LABOR/MANAGEMENT RELATIONS		
G4-DMA	Generic Disclosures on Management Approach	37
G4-LA4	Minimum Notice Periods	37
ASPECT: OCCUPATIONAL HEALTH AND SAFETY		
G4-DMA	Generic Disclosures on Management Approach	39
G4-LA6	Injury and Illness Rates	39
ASPECT: TRAINING AND EDUCATION		
G4-DMA	Generic Disclosures on Management Approach	41–42
G4-LA9	Employee Training	17, 41
G4-LA10	Skills Management Programs	41–42
ASPECT: DIVERSITY AND EQUAL OPPORTUNITY		
G4-DMA	Generic Disclosures on Management Approach	36
G4-LA12	Diversity of Governance Bodies and Workforce	36, 38, 2016 10-K
ASPECT: SUPPLIER ASSESSMENT FOR LABOR PRACTICES		
G4-DMA	Generic Disclosures on Management Approach	19–20
G4-LA14	Supplier Social Screening	20
ASPECT: LABOR PRACTICES GRIEVANCE MECHANISMS		
G4-DMA	Generic Disclosures on Management Approach	17
G4-LA16	Labor Grievances	17
ASPECT: INVESTMENT		
G4-DMA	Generic Disclosures on Management Approach	16–17
G4-HR2	Employee Training on Human Rights	17
ASPECT: NON-DISCRIMINATION		
G4-DMA	Generic Disclosures on Management Approach	16, 19, 36
G4-HR3	Incidents of Discrimination	17
ASPECT: CHILD LABOR		
G4-DMA	Generic Disclosures on Management Approach	16, 19, 37
G4-HR5	Significant Risks of Child Labor	17, 20
ASPECT: FORCED OR COMPULSORY LABOR		
G4-DMA	Generic Disclosures on Management Approach	16, 19, 37
G4-HR6	Significant Risks of Forced Labor	17, 20
ASPECT: SUPPLIER HUMAN RIGHTS ASSESSMENT		
G4-DMA	Generic Disclosures on Management Approach	19–20
G4-HR10	Supplier Screening of Human Rights	20

GRI INDICATOR	DESCRIPTION	PAGE NUMBER
ASPECT: HUMAN RIGHTS GRIEVANCE MECHANISMS		
G4-DMA	Generic Disclosures on Management Approach	16
G4-HR12	Human Rights Grievances	17
ASPECT: LOCAL COMMUNITIES		
G4-DMA	Generic Disclosures on Management Approach	44
G4-SO1	Operations with Local Community Engagement Programs	44
ASPECT: ANTI-CORRUPTION		
G4-DMA	Generic Disclosures on Management Approach	16–17
G4-SO4	Anti-Corruption Communication and Training	17
G4-SO5	Corruption Incidents	17
ASPECT: ANTI-COMPETITIVE BEHAVIOR		
G4-DMA	Generic Disclosures on Management Approach	16
G4-SO7	Anti-Competitive Incidents	17
ASPECT: COMPLIANCE		
G4-DMA	Generic Disclosures on Management Approach	16–17
G4-SO8	Non-Compliance, Fines and Sanctions	17
ASPECT: SUPPLIER ASSESSMENT FOR IMPACTS ON SOCIETY		
G4-DMA	Generic Disclosures on Management Approach	19–20
G4-SO9	Suppliers Screening on Societal Impact	20
ASPECT: GRIEVANCE MECHANISMS FOR IMPACTS ON SOCIETY		
G4-DMA	Generic Disclosures on Management Approach	16
G4-SO11	Societal Grievances	17
ASPECT: PRODUCT AND SERVICE LABELING		
G4-DMA	Generic Disclosures on Management Approach	24–25
G4-PR4	Product Labeling Non-Compliance	17
G4-PR5	Customer Satisfaction	24–25
ASPECT: MARKETING COMMUNICATIONS		
G4-DMA	Generic Disclosures on Management Approach	24
G4-PR7	Marketing Non-Compliance, Fines and Sanctions	17
ASPECT: CUSTOMER PRIVACY		
G4-DMA	Generic Disclosures on Management Approach	25
G4-PR8	Breaches of Customer Privacy and Losses of Customer Data	17
ASPECT: COMPLIANCE		
G4-DMA	Generic Disclosures on Management Approach	16–17, 21
G4-PR9	Product and service non-compliance, fines and sanctions	17, 21



Global Headquarters  
140 Caspian Court  
Sunnyvale, CA 94089  
USA  
Tel: 1 408 572 5200  
Fax: 1 408 572 5454  
[www.infinera.com](http://www.infinera.com)

US Sales Contacts  
[sales-am@infinera.com](mailto:sales-am@infinera.com)

Asia and Pacific Rim  
Infinera Asia Limited  
8th floor  
Samsung Hub  
3 Church Street  
Singapore 049483  
Tel: +65 6408 3320  
[sales-apac@infinera.com](mailto:sales-apac@infinera.com)

Europe, Middle East,  
Africa  
Infinera Limited (EMEA HQ)  
125 Finsbury Pavement  
London EC2A 1NQ,  
United Kingdom  
Tel: +44 207 065 1340  
[sales-emea@infinera.com](mailto:sales-emea@infinera.com)

Customer Service and  
Technical Support  
North America  
Tel: 877 INF 5288  
Outside North America  
Tel: 1 408 572 5288  
[techsupport@infinera.com](mailto:techsupport@infinera.com)

