



Last Modified January 2026

Calix, Inc. Supplier Code of Conduct

Calix, Inc. and its affiliates (“Calix”) is committed to meeting the highest ethical standards and compliance with all applicable laws, rules, and regulations, and expects suppliers (“Suppliers”) engaged in providing products and services to Calix to have, or to make, a similar commitment. This Supplier Code of Conduct (“Code”) describes these minimum expectations with respect to ethical principles for labor, health, safety, the environment, and supply transparency.

Calix relies on Suppliers to determine how to meet and demonstrate compliance with this Code, including monitoring of sub-tier suppliers for similar compliance. Calix expects Suppliers to apply the Code’s principles into continuous improvement efforts aimed at advancing performance over time. While the Code is generally intended to serve as a guideline for our partners, adherence to the Code is a key factor in our evaluation of ongoing opportunities. As such, Calix expects you to maintain accurate records of your efforts to comply with this Code and provide Calix with such records upon request.

Calix reserves the right to update or change this Code, which is not meant to, and does not, supersede any applicable law, or any term in an agreement between Calix and a Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls.

Without limiting the generality of the above or other requirements under law or contract, as a Supplier to Calix, you acknowledge and will:

- 1) Legal Compliance
 - a) Comply with all applicable laws and regulations.
- 2) Human Rights and Labor Practices

Ensure respect and compliance with all internationally proclaimed human rights initiatives with special attention paid to respecting the rights of vulnerable or disadvantaged groups, including but not limited to women, minors, migrant workers, or indigenous communities.

 - a) Prohibition of Forced Labor
 - i) Neither use nor contribute to slavery, servitude, forced or compulsory labor, or human trafficking.

- b) Prohibition of Child Labor
 - i) Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14.
 - ii) Employ no workers under the age of 18 for hazardous work according to ILO Convention 182.
 - c) Non-Discrimination and Respect for Employees
 - i) Promote equal opportunities and treatment of Supplier's employees, irrespective of race, nationality, ethnicity, political affiliation, social background, disability, gender, sexual orientation, marital status, religion, or age.
 - ii) Refuse to tolerate any unacceptable treatment of individuals, including sexual harassment or discrimination.
 - d) Working Hours, Wages & Benefits for Employees
 - i) Recognize the legal rights of workers to freedom of association and to engage in collective bargaining without facing discrimination or intimidation. Provide workers and their representatives with a channel to communicate and share concerns with management regarding working conditions and practices without fear of discrimination, reprisal, intimidation, or harassment. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.
 - ii) Adhere to all applicable working-hours regulations.
 - iii) Pay fair and legal wages for labor in accordance with applicable wage and compensation laws.
 - iv) Calix encourages our suppliers to continuously provide career training and opportunities for advancement to their workforce.
 - e) Health & Safety of Employees
 - i) Provide safe working conditions for all employees and contractors.
 - ii) Act in accordance with the applicable statutory and international standards regarding occupational health and safety.
 - iii) Provide ample education and recorded training to ensure Supplier's employees and staff are educated and aware of health & safety issues.
 - iv) Identify and assess emergency situations in the workplace and any Supplier-provided living quarters to minimize their impact by implementing emergency plans and response procedures.
 - v) Prevent or mitigate incidents associated with operations and processes that may result in material impacts to people or the environment.
 - f) Grievance Mechanism
 - i) Provide access to a mechanism for Supplier's employees and staff to report alleged violations of this Code.
- 3) Environmental Protection
- a) Prevent and mitigate accidental spills and releases of harmful chemicals into the environment.

- b) Reduce the Supplier's environmental footprint through minimizing use of natural resources and the environmental impact of their activities.
- c) Ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges.
- d) Appropriately manage, control, and treat any potential adverse impact to human or environmental health as a result of Supplier's business activities.
- e) Minimize environmental pollution and make continuous improvements in environmental protection by seeking opportunities to:
 - i) Reduce the carbon footprint of your business;
 - ii) Minimize wasteful practices;
 - iii) Maximize use of recycled materials and implement end-of-life recycling alternatives;
 - iv) Increase energy efficiency and reduce water use;
 - v) Reduce use of paper;
 - vi) Responsibly source product materials, especially minerals;
 - vii) Develop and use more efficient and sustainable packaging; and
 - viii) Obtain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations, and restrictions.

4) Fair Operating Practices

- a) Anti-Corruption and Bribery
 - i) Not tolerate any form of and will not engage, directly or indirectly, in any form of corruption or bribery.
 - ii) Not grant, offer, or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage.
- b) Fair Competition, Anti-Trust Laws and Intellectual Property Rights
 - i) Act in accordance with national and international competition standards and will not participate in price fixing, illegal market or customer allocation, market sharing or bid rigging with competitors.
 - ii) Respect the intellectual property rights of Calix or other third parties.
- c) Conflicts of Interest
 - i) Avoid actual conflicts of interest and minimize the possibility or appearance of conflicts of interest.
- d) Anti-Money Laundering, Terrorism Financing
 - i) Not directly or indirectly facilitate money laundering or terrorism financing.
- e) Confidential Information & Data Privacy
 - i) Process personal data confidentially and responsibly in accordance with applicable data privacy laws and any agreements with Calix.
 - ii) Protect all confidential information, including personal information disclosed to or collected from or on behalf of Calix and take all necessary technical, procedural, and administrative

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safeguards to prevent its unauthorized disclosure, misuses, theft, fraud, disclosure or alteration; including an unauthorized communication and/or publication of information acquired from or on behalf of Calix.

- iii) Suppliers may not use, process, or input any Calix data—including confidential information or personal data—into artificial intelligence (AI) tools, platforms, or systems without obtaining explicit written permission from Calix.

f) Personnel Identity Validation and Ongoing Assurance

- i) Suppliers must have a robust identity validation and ongoing assurance program, which includes verifying the identities of all personnel with access to Calix systems or data using government-issued ID and multi-factor authentication. Unique credentials are required; shared accounts and password sharing are prohibited. Access rights must be reviewed regularly and revoked promptly upon termination or role change. Suppliers must report identity-related incidents to Calix and comply with industry standards for identity assurance.

g) Trade Compliance

- i) Comply with applicable import and export controls, sanctions, and other trade compliance laws, regulations, and rules of the United States and of any country where such transactions occur.

5) Responsible Minerals Sourcing

- a) Upon request, promptly provide Calix with certification (CMRT) of the content of their products, including where and from whom the minerals are sourced. For purposes of this section, “Conflict Minerals” refer to columbite-tantalite (tantalum), cassiterite (tin), gold, wolframite (tungsten), or their derivatives. In addition, Calix requires applicable Suppliers to take the following actions:
 - i) Commit to the identification, reduction, and ultimate elimination of use of Conflict Minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or surrounding countries;
 - ii) Work with their own upstream Suppliers and supply chain to conduct due diligence to determine the source and chain of custody, of Conflict Minerals that are contained in products or materials supplied to Calix;
 - iii) Establish their own policies, due diligence frameworks, and management systems for the traceability of Conflict Minerals consistent with applicable international standards, and communicate an expectation to their sub-tier suppliers that they do the same; and
 - iv) Cooperate with Calix in its efforts to comply with any applicable reporting requirements (including without limitation the SEC Conflict Minerals Disclosure Rule), including providing timely responses to Calix’s inquiries regarding the origin and chain of custody of Conflict Minerals in products or materials supplied to Calix (including the smelter, country of origin, mine location and status) and, upon request, adequate verification of such information.

6) Supply Chain

- a) Use reasonable efforts to ensure its Suppliers comply with the principles of this Code.
- b) Comply with the principles of non-discrimination in regard to Supplier selection and treatment.
- c) Continually improve by setting performance objectives, executing implementation plans, and

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taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, or management reviews.

- d) Assume responsibility for developing and implementing appropriate business continuity plans for any and all operations supporting Calix's business. Upon request, Supplier will provide the above-mentioned plans to Calix, and if available, audit results of compliance with the plans.
- e) Maintain documentation necessary to demonstrate conformance with this Code, applicable laws, regulations, standards, and Calix's contractual requirements.
- f) Demonstrate commitment to the principles contained herein by allocating appropriate resources.