ADTRAN Holdings, Inc.
Human Rights Policy

Purpose

This Human Rights Policy (the "Policy") formalizes the commitment of ADTRAN Holdings, Inc. and its subsidiaries (collectively, "Adtran" or the "Company") to uphold and respect human rights for all people. Adtran's commitment to human rights in its operations and throughout its supply chain is independent of any country or government's willingness to fulfill its own human rights obligations.

Adtran's commitment to human rights has been integrated into its operations since its inception in 1985. This Policy reinforces Adtran's commitment to serve as an industry leader in policies and practices that respect and protect all, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.

Definition

Human Rights are the fundamental rights, freedoms, and standards of treatment adhered to by governments, businesses and individuals around the world and outlined in full in the United Nation's Universal Declaration of Human Rights. These fundamental rights are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery, freedom of expression, the right to work, and many more universal, inviolable and interdependent fundamental freedoms.

Responsibility

The legal and human resources departments are jointly responsible for maintaining and administering this Policy. Management is responsible for implementing the Policy and integrating respect for human rights into the Company's operations and supply chain.

Procedure

1. *Scope*

Adtran is committed to operating in compliance with the mandatory laws and regulations of the countries in which it operates and expects the same of its partners, vendors and suppliers.

In the United States, the Company complies with a wide variety of laws and regulations at both the federal and state levels that serve to protect human rights, including, but not limited to, the Civil Rights Act; the Americans with Disabilities Act; the Fair Labor Standards Act; the Equal Pay Act; the Occupational Safety and Health Act; the Family and Medical Leave Act; the Labor-Management Relations Act; the Alien Tort Claims Act; and other laws as administered by the Equal Employment Opportunity Commission.

Internationally, Adtran voluntarily strives to protect the high-level human rights principles outlined in the United Nation's Universal Declaration of Human Rights; the fundamental Conventions published by the International Labour Organization and ratified by the United States; the United Nations Guiding Principles on Business and Human Rights; the OECD Guidelines for Multinational Enterprises; and the Uyghur Forced Labor Prevention Act, P.L. 117-78 (2021) and its implementing regulations (the UFLPA).

Adtran actively pursues conformance to the Responsible Business Alliance Code of Conduct and the guidance established by ISO 26000:2010.

This Policy should be reviewed in conjunction with Adtran's Code of Business Conduct & Ethics, as well as the Company's other policies and programs to support sustainability and fair employment practices.

2. *Policy Statements*

Adtran, its employees, partners, suppliers, vendors and contractors should continue to protect and promote human rights. We strive to:

- 2.1 Provide fair and equitable wages as required by law, and a living wage in areas where the law is silent.
- 2.2 Protect the rights of minorities and women and provide equal pay regardless of race or gender.
- 2.3 Recognize employees' rights to freedom of association.
- 2.4 Prohibit forced or child labor, including but not limited to compliance with the UFLPA.
- 2.5 Promote a workplace of diversity and inclusion that is free of discrimination and harassment.
- 2.6 Protect employees' rights to freedom of expression.
- 2.7 Provide a safe workplace for employees with fair labor conditions and reasonable work hours.
- 2.8 Engage stakeholders on issues that impact human rights.
- 2.9 Contribute to global communities through volunteerism, impactful social programs, and economic empowerment of all people.
- 2.10 Regularly assess risks to human rights and report transparently on any concerns of human rights violations throughout the Company's supply chain.
- 2.11 Remain committed to responsible business practices that do not infringe on human rights.
- 2.12 Support and recognize freedom of association and collective bargaining as part of its commitment to support the fair and equitable treatment of workplace workers.

This non-exhaustive list is illustrative of Adtran's ongoing commitment to the protection of human rights globally. Adtran expects that its global partners, suppliers, vendors and contractors support and join this commitment.

3. *Written Agreement*

Adtran encourages you to report actual or potential violations of this Policy. If you are aware of conduct that you reasonably believe may violate this Policy, you are responsible for reporting it. Reporting a potential violation demonstrates your sense of commitment, responsibility, and fairness to Adtran's customers, stockholders, business associates, and your fellow employees. You may report potential or actual violations to your manager, Human Resources, the Legal Department, Internal Audit, or to the Company's hotline. Adtran offers an ethics and compliance hotline managed by WhistleB Reporting, a third-party provider that allows employees to confidentially and anonymously report concerns of potential improper activities within the workplace. You may contact WhistleB Reporting through the following means:

Online: https://report.whistleb.com/adtran
Phone: 1.800.218.8954 (client code: 453581)
(available 24 hours a day, 7 days a week)

Reporting potential Policy violations helps to safeguard the reputation and assets of the Company. Your report will be investigated confidentially, and you will be protected from retaliation.

If you have any questions regarding this Policy, you may contact the legal or human resources departments at any time.

****