

Non-Harassment Policy

Purpose

To provide a respectful and productive work environment free from verbal, visual, written, or physical conduct that harasses, disrupts, or interferes with another's work performance, or which creates an intimidating or hostile work environment.

Policy

Any form of harassment, whether because of one's race, color, age, religion, sex, national origin/ancestry, sexual orientation, citizenship, disability, or any other legally protected characteristic or activity is prohibited.

These prohibitions apply to both the workplace and to other work-related settings, such as business trips and business-related social events.

Harassment: Harassment is defined as unwelcome verbal, visual, written or physical conduct, which creates an intimidating or hostile work environment. Some examples include, but are not limited to the following:

derogatory comments or jokes regarding a person's race, color, age, religion, sex, national origin/ancestry, sexual orientation, citizenship, disability, physical appearance or any other legally protected characteristic or activity; or the distribution or display of written or graphic materials which have the same effect.

Sexual Harassment: Sexual Harassment is defined as unwelcome verbal, visual or physical conduct of a sexual nature when (1) submission to or rejection of this conduct by an individual is made a condition of continued employment/services or is used as a factor in decisions affecting hiring, retention, evaluation, promotion, wages, assigned duties, shifts or other conditions of employment or career development; or (2) this conduct unreasonably interferes with an individual's work or creates an intimidating or hostile work environment.

Examples of sexual harassment may include, but are not limited to:

Demands for sexual favors;

Unwelcome sexual flirtations, touching, advances, jokes or propositions;

Verbal abuse of a sexual nature;

Graphic or suggestive comments about an individual's dress or body;

Sexually degrading names or words to describe an individual;

Sexually suggestive or insulting sounds or gestures, including whistling,

Creating, transmitting, viewing, storing or displaying in the workplace any sexually suggestive objects, pictures, electronic images or words.

Suggestive or obscene letters, emails, notes or invitations.

Co-workers, supervisors, subordinates and non-employees can both initiate and be the target of unwelcome harassment. Sexual

harassment can be initiated by a female or male, against a female or male.

Reporting a Complaint

All Tellabs' employees are obligated to assist the Company with maintaining a professional workplace free from harassment. If you are subject to inappropriate conduct, if you witness such conduct or if you are made aware of it, you must report the conduct through one of the following avenues:

- Contact your human resources manager or any supervisor or manager. If you are uncomfortable doing this for any reason, you may use one of the alternatives below:
- Contact an upper level human resources manager or any other management official utilizing the Problem Resolution Procedure;
- Contact Tellabs' assistant general counsel, employment law and compliance, at +1.630.798.3009 (83009); or
- Contact Tellabs through the Ethics and Integrity Hotline, at +1.630.798.3008 (83008) toll-free, at +1.888.632.3060 or via email at ethics.hotline@tellabs.com.

Investigation of a Complaint

Complaints under this policy will be investigated by Human Resources and/or the law department. Complaints will be investigated promptly and in as confidential a manner as possible. A timely resolution of each complaint will be reached and appropriately communicated to the parties involved. If an investigation confirms that a violation of this policy has occurred, the Company will take corrective action as appropriate, including discipline, up to and including termination of employment.

Protection Against Retaliation

Tellabs prohibits any form of retaliation against any person for making a good faith complaint under this policy or assisting in any investigation. Any person who reports an incident of harassment or has assisted in an investigation, and who has been coerced, intimidated or threatened in any manner for doing so, should follow the reporting procedure described above.

Filing a Complaint with the State

Employees in Illinois may take legal recourse by filing a charge with the Illinois Department of Human Rights located at 100 West Randolph Street, Suite 10-100, Chicago, IL 60601, at +1.312.814.6200 or in Springfield at 222 South College, Floor 1, Springfield, IL 62704, at +1.217.785.5100. The Department will investigate timely charges and will determine whether there is sufficient evidence to support the charge. If so, the Department may file a complaint on your behalf with the Illinois Human Rights Commission. You may also file a complaint with the Commission



yourself between the 300th and 330th day after filing the charge if the Department has not yet issued a determination. The Commission is located at 100 West Randolph Street, Suite 5-100, Chicago, IL 60601.

Employees in California may take legal recourse by filing a complaint with the United States Equal Employment Opportunity Commission. To contact the commission consult directory assistance or write to Equal Employment Opportunity Commission, 1801 L Street, NW, Washington, D.C., 20507. You may also file a complaint with the Department of Fair Employment and Housing (“DFEH”) which is the state agency that resolves complaints of unlawful discrimination, including sexual harassment. To contact the DFEH, consult your local telephone directory under State Government Offices or ask directory assistance for the number of the Department of Fair Employment and Housing headquarters in Sacramento or write to Department of Fair Employment and Housing, 2014 T Street, Suite 210 Sacramento CA 95814-6824.

Employees in Massachusetts may take legal recourse by filling a complaint with either the United States Equal Employment Opportunity Commission (“EEOC”), JFK Federal Building, Room 475, Boston, MA 02203, at +1.617.565.3200 or with the Massachusetts Commission Against Discrimination (“MCAD”) at its Boston Office, One Ashburton Place, Room 601, Boston, MA 02108, at +1.617.727.3990, or its Springfield Office, 436 Dwight Street, Room 220, Springfield, MA 01103, or at 1.413.739.2145

Responsibilities

Management: Each manager and supervisor is responsible for maintaining a workplace free of any form of harassment; for ensuring that all employees within his or her area of supervision are aware of this policy; and for ensuring that any personnel decision made in his or her department is in accordance with this policy. If a manager observes, or is made aware of, any conduct that could be considered harassment, the manager shall take prompt action to eliminate such behavior and report such behavior immediately to human resources and/or the law department. If a manager receives a complaint of a violation of this policy, the manager should promptly inform either human resources or the law department.

Employees: All Tellabs employees are expected to contribute to a productive work environment that is free from harassing or other disruptive activity. As set forth above, any employee who believes that the words or actions of a supervisor, co-worker or

non-employee constitute harassment should report the situation as soon as possible. Employees are also expected to cooperate in any investigation conducted pursuant to this policy.

Human Resources Department: The human resources department, in consultation with the law department, is responsible for enforcing this policy and thoroughly investigating all complaints or reports of harassment.

Law Department: The law department is responsible for supporting the human resources department in enforcing this policy and in investigating all complaints reports of harassment. The law department may, in select cases, investigate an alleged violation of this policy.

Definitions

Disability: A physical or mental impairment that substantially limits one or more major life activity.

Discrimination: Illegal treatment based on a person’s race, religion, color, sex, national origin/ancestry, citizenship, age, marital status, disability, sexual orientation, veteran or any other protected class status.

Harassment: Unwelcome verbal, visual, written or physical conduct, which creates an intimidating or hostile work environment. Some examples include, but are not limited to the following: derogatory comments or jokes regarding a person’s race, color, age, religion, sex, national origin/ancestry, sexual orientation, citizenship, disability, physical appearance, or any other legally protected characteristic or activity; or the distribution or display of written or graphic materials which have the same effect.

Tellabs’ Property: All property and premises owned or leased by Tellabs or any of its affiliates, subsidiaries or divisions.

Sexual Harassment: Unwelcome verbal, visual or physical conduct of a sexual nature when (1) submission to or rejection of this conduct by an individual is made a condition of continued employment/ services or is used as a factor in decisions affecting hiring, retention, evaluation, promotion, wages, assigned duties, shifts or other conditions of employment or career development; or (2) this conduct unreasonably interferes with an individual’s work or creates an intimidating or hostile work environment.

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