

**CODE OF ETHICS
FOR
SENIOR FINANCIAL OFFICERS**

Revised December 2024

This Code of Ethics applies to Ciena Corporation's Chief Executive Officer, Chief Financial Officer, and Controller ("**Senior Financial Officers**"). Its purpose is to deter wrongdoing and promote honest and ethical conduct and compliance with the law, particularly as related to the maintenance of the Company's financial records and the preparation of financial statements filed with the Securities and Exchange Commission ("**SEC**"). The obligations of this Code of Ethics supplement, but do not replace, the Code of Business Conduct and Ethics applicable to all employees, officers, and directors. Senior Financial Officers are expected to carry out their responsibilities honestly and with integrity, exercising at all times their best independent judgment, and shall observe standards to deter wrongdoing and promote:

1. The ethical handling, to the extent possible, of situations in which their own interests conflict, or may appear to conflict, with the interests of the Company. Conflicts of interest are sometimes unavoidable, however. In any case in which a Senior Financial Officer finds himself or herself with an actual or apparent material conflict of interest between personal and professional relationships, he or she should promptly disclose it to the Company's General Counsel, who will review the transaction or relationship. If the Company's General Counsel determines that a material conflict does exist, he or she will refer the matter to the Audit Committee of the Board of Directors, which shall determine how the situation should be resolved.
2. Full, fair, accurate, timely and understandable disclosure of relevant financial information to shareholders and investors. In particular, Senior Financial Officers are responsible for assuring that the Company complies with SEC rules governing disclosure of financial information and for assuring that press releases and communications with investors and securities analysts are fair and accurate. Among other things, Senior Financial Officers should:
 - (a) Establish and maintain internal controls and procedures and disclosure controls and procedures designed to assure that financial information is recorded, processed and transmitted to those responsible for preparing periodic reports and other public communications containing financial information so that they are complete, accurate, and timely;
 - (b) Carefully review each periodic report for accuracy and completeness before it is filed with the SEC and carefully review each public communication containing financial information before it is released;
 - (c) Promptly disclose to their superiors, and if necessary to the Audit Committee of the Board of Directors and the Company's independent auditors, any material

weaknesses in, or concerns regarding, the Company's disclosure controls or internal controls; and

(d) Comply at all times with applicable governmental laws, rules and regulations.

3. The prompt reporting to the Audit Committee or the full Board of Directors of:

(a) Any matters that could compromise the integrity of the Company's financial reports;

(b) Any disagreement with respect to any material accounting matter; and

(c) Any violation of this Code of Ethics or of any law or regulation related to the Company's accounting or financial affairs.

4. Accountability for adherence to this Code of Ethics and other applicable Company policies, procedures, and standards.

The Audit Committee of the Board of Directors shall approve any waiver or amendment of this Code of Ethics, and any such waiver or amendment shall be disclosed promptly, as required by law or SEC regulation.