



Political Spending Policy

The purpose of this policy is to guide Tellabs' approach to corporate political spending subject to our other policies and procedures, including Tellabs Code of Conduct <http://www.tellabs.com/about/integritypolicy.pdf>.

Political Contributions

Tellabs has always believed that directing our resources into our core business activities – not political contributions – best serves our business and our stakeholders.

Therefore, ***Tellabs does not make political contributions****. This prohibition includes contributions to candidates, political parties, political action committees, groups created primarily to influence elections (e.g., 527s), political events or funding related to a particular referendum or ballot initiative.

Tellabs will publicly disclose political contributions (if any). Tellabs does not have a political action committee (PAC), and has never had one.

Tellabs may accommodate legislators or candidates for elective office to visit corporate facilities subject to the prior approval of the Chief Executive Officer, Chairman or their respective designees. No other employee may approve such meetings on Tellabs' behalf.

Tellabs expects that directors, officers and employees engaging in political activities will do so as private citizens and not as representatives of Tellabs.

Lobbying

Tellabs is a member of industry organizations that lobby for legislation to benefit our customers and our business. While we do not currently lobby directly, we may consider doing so in the future.

Oversight

Tellabs Chief Administration Officer reviews this policy annually, in conjunction with other corporate responsibility activities.

** The term “contribution” includes cash donations, use of Tellabs equipment, supplies, time, facilities or other property, participation in events or other direct benefits that normally require a contribution.*