



Title: Global Harassment Prevention Policy	
Policy Family: Compliance	
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Policy Document Owner: Stacey Piña	

1. OBJECTIVE

To reaffirm Avaya’s commitment to and zero tolerance policy for unlawful discrimination, harassment, bullying, victimization, mobbing, and retaliation in the workplace.

2. APPLICABILITY

This Policy is applicable to all employees, applicants, contractors and work sites of Avaya Inc., its subsidiaries, or affiliates (“Avaya” or the “Company”) worldwide.

3. POLICY

Avaya is committed to providing all its employees with a work environment free from unlawful discrimination, retaliation and harassment (which includes behavior considered to be unlawful victimization, bullying or mobbing). It is Avaya’s policy to comply with both the letter and the spirit of all applicable laws and regulations governing employment^[1].

Avaya’s zero tolerance Global Harassment Prevention Policy strictly prohibits unlawful workplace harassment, whether it occurs on or off Avaya premises, because of known or perceived:

sex, race, ethnicity, color, creed, religion, national origin or ancestry, citizenship, marital 11 status, age, sexual orientation, gender identity,



character or expression, allyship, affiliation, physical or mental disability, veteran status or any other legally-protected class or characteristic.

Physical, verbal and electronic harassment are prohibited, regardless of whether committed by supervisory or non-supervisory personnel, or by a consultant, vendor, client, or customer of Avaya.

This zero-tolerance policy prohibits behavior including, but not limited to:

- Sexual harassment¹ which encompasses, but is not limited to, the following: quid pro quo harassment; unwelcome attention of a romantic or sexual nature; egregious, offensive or unwelcome sexual flirtations, advances, or propositions; abuse of a sexual nature; sexually suggestive, explicit or graphic comments; sexually degrading language used to describe an individual; and the display in the workplace of sexually suggestive objects, images or pictures.
- Unlawful harassment on the basis of race, ethnicity, color, creed, religion, national origin or ancestry, citizenship, marital status, age, sex, gender, sexual orientation, gender identity, character or expression, allyship, affiliation, physical or mental disability, veteran status or any other legally-protected class or characteristic, which can be defined as threatening, abusive, or intimidating comments or conduct that unreasonably interfere(s) with an employee's work performance or creates an intimidating, hostile, or offensive work environment.
- Behavior defined by local law as unlawful harassment, bullying, victimization or mobbing.

¹ Note: prohibited sexual harassment can occur between members of the same or opposite sex.



No manager or supervisor shall threaten or insinuate, either explicitly or implicitly, that an employee's or applicant's submission or rejection of sexual advances will in any way influence any personnel decision regarding employment, wages, advancement, job assignment, career development, or any other term or condition of employment.

Avaya further prohibits discipline, reprisal, unlawful bullying, harassment, intimidation, threats, coercion, discrimination or retaliation² in any form, for:

- requesting a reasonable accommodation or work adjustment on the basis of a protected medical condition or religious practice;
- making a good faith report or complaint of unlawful conduct including discrimination, harassment, fraud, theft, or violations of Avaya's Code of Conduct;
- assisting or participating in a Corporate Compliance or Human Resources investigation, compliance review, hearing, or any other enforcement proceeding; or
- pursuing a discrimination or harassment claim, or opposing any act made illegal by federal, state, or local equal opportunity law.

It is Avaya's policy to promptly and diligently investigate all good faith claims of discrimination, unlawful harassment, or other prohibited behavior, including retaliation, in accordance with applicable law, to maintain confidentiality to the extent possible in light of the personal nature of these matters and the important privacy interests of all concerned, and to take prompt and appropriate remedial action, if appropriate.

Avaya cooperates with government officials in conducting investigations and other activities related to the administration of applicable federal, state, and local legislation. This policy is not intended to restrict communications or actions protected or required by law.

² For more information on Avaya's policy prohibiting retaliation, please refer to Avaya's Global Equal Opportunity Non-Discrimination and Retaliation Prevention Policy.



Each year, we voluntarily reaffirm Avaya's commitment to harassment prevention and to the real strength that diversity, equal opportunity and this policy bring to our Company. All Avaya employees are responsible for helping to ensure that we prevent unlawful workplace harassment by reviewing and fully complying with this and all related [Avaya Policies](#). These policies include, but are not limited to Avaya's:

[Global Non-Discrimination and Retaliation Prevention Policy](#)³

[Global Reasonable Accommodation Policy](#)¹

[Global Code of Conduct](#)

[Canada Anti-Harassment Policy](#)⁴

[U.S. Affirmative Action Policy](#)⁵

All management level employees are required to become familiar with the provisions of this Policy and to be able to discuss this material with employees. Additionally, any manager or supervisor who becomes aware of potential discriminatory or harassing conduct must report the alleged matter to [Avaya Ethics and Compliance Hotline](#) to so that a timely confidential investigation can be conducted and corrective action taken, if appropriate. Employees at any level who do not comply with the provisions of this policy may be subject to discipline, up to and including the immediate termination of employment.

Any employee who believes in good faith that they experienced harassment as defined by this policy, have witnessed or have knowledge of potential unlawful workplace harassment should immediately report the matter to: the [Avaya Ethics and Compliance Hotline](#) at 1-877- 993-8442 (US) or 908-953-7276 (outside the US), eocontact@avaya.com, Human Resources or a member of the

³ Edit your Country/Language setting to choose your Region and Country selection = Global

⁴ Edit your Country/Language setting to choose your Region and Country selection = Canada

⁵ Edit your Country/Language setting to choose your Region and Country selection = United States

management team.

All good faith allegations will be confidentially and thoroughly investigated including anonymous reports. Avaya's electronic complaint form is available via the [Avaya Ethics and Compliance Hotline](#).



James Chirico
President & Chief Executive Officer
December 2020



Faye Tylee
Global Head of Human Resources

4. REFERENCES

Avaya is an Equal Opportunity Employer. Our commitment to equality is a core value of Avaya. All qualified applicants and employees are entitled to receive equal treatment without consideration for race, religion, sex, national origin, disability status or any other protected characteristic. For more information and support, contact Avaya's Equal Opportunity hotline by phone at 1-877-993-8442 (US) or 908-953-7276 (outside the US) or at <https://app.convercent.com/en-us/Anonymous/IssueIntake/IdentifyOrganization>.

[1] Avaya is a U.S. VEVRAA Federal Contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veteran's Readjustment Assistance Act of 1974 (Section 4212), as amended and Section 503 of the Rehabilitation Act of 1973, as amended (Section 503). Accordingly, Avaya is committed to taking positive steps to implement the employment-related aspects of the global Equal Opportunity policy in the United States.



AVAYA INC. ("AVAYA") HAS THE RIGHT TO AMEND, CHANGE, OR CANCEL ANY POLICY SOLELY AT ITS DISCRETION AND WITHOUT PRIOR NOTICE, UNLESS OTHERWISE PROVIDED FOR IN YOUR EMPLOYMENT AGREEMENT OR GOVERNING LAW. NOTHING PUBLISHED IN THIS HR POLICY PORTAL OR DISTRIBUTED BY AVAYA IS AN EXPRESS OR IMPLIED CONTRACT FOR CONTINUED EMPLOYMENT OR EMPLOYMENT OF A SPECIFIC LENGTH OF TIME. AVAYA EMPLOYEES ARE EMPLOYEES-AT-WILL; MEANING AVAYA EMPLOYEES MAY TERMINATE THEIR EMPLOYMENT AT ANY TIME AND FOR ANY REASON. THAT ALSO MEANS THAT AVAYA CAN TERMINATE ITS EMPLOYEES' EMPLOYMENT AT ANY TIME AND FOR ANY REASON. EMPLOYEES OF AVAYA'S SUBSIDIARIES IN NON-US JURISDICTIONS SHOULD REFER TO ANY APPLICABLE LAWS AND LABOR AGREEMENTS.