



## Avaya Responsible Minerals Policy

### Background

Virtually all electronic products contain various minerals necessary for functionality including tantalum, tin, tungsten, and gold (also referred to as 3TG). 3TG are sometimes known as "conflict minerals" because of concerns about their mining and sale contributing to armed conflict and human rights abuses in the Democratic Republic of Congo ("DRC") and nine neighboring countries, (defined as "covered countries" by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Dodd-Frank Act")).

The Dodd-Frank Act requires publicly traded companies to assess their supply chains and report annually on the source of conflict minerals in the products they manufacture or contract to manufacture.

Along with governments, NGOs, the investment community, and many other companies worldwide, we are concerned about human rights violations including forced labor, human trafficking and child labor occurring anywhere in the world, as well as the role that armed conflicts play in causing extreme violence across so-called Conflict-Affected and High-Risk Areas. <sup>1</sup>

### Avaya's Commitment

Consistent with our commitment to corporate social responsibility, Avaya is committed to the sourcing of minerals in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain and preserves the environment. Avaya does not directly procure minerals from mines or the smelters or refiners that process them, rather our suppliers acquire and use minerals from multiple sources worldwide. We influence the upstream supply chain through our policies and practice and our goal is to work collaboratively with our supply chain to source minerals consistent with our values around human rights, business ethics, labor, health and safety practices and environmental responsibility.

Avaya will:

- Require our supply chain to source 3TG from smelters and refiners that conform to the Responsible Minerals Assurance Process ("RMAP")
- Conduct due diligence to identify and mitigate risks in our supply chain, following the OECD Due Diligence Guidance

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<sup>1</sup> See also our Statement on the Prevention of Modern Slavery & Human Trafficking at: <https://www.avaya.com/en/documents/avaya-uk-modern-slavery-act-transparency-statement.pdf>

- Collaborate with customers, suppliers and industry associations including the Responsible Minerals Initiative (“RMI”) on long terms solutions and best practice to enable responsible sourcing
- Commit to transparency in the implementation of this policy by making available reports on our progress to relevant stakeholders and the public.

## Avaya’s Expectations of Suppliers

To support our commitment to the responsible sourcing of minerals, we expect our suppliers to:

- Comply with the Avaya Supplier Code of Conduct<sup>2</sup>
- Source 3TG only from smelters and refiners validated as conformant to the RMAP third party assessment program
- Source minerals from non-conflict regions or, if sourced from conflict regions, to verify that the sourcing is conflict-free (i.e., not used to fund conflicts in Covered Countries) through a reasonable due diligence program
- Disclose to Avaya via the RMI Conflict Minerals Reporting Template (“CMRT”) the requested information necessary for Avaya to conduct its due diligence and accurately report to the SEC as required
- Respond to Avaya inquiries for due diligence information, and promptly implement corrective actions identified and requested by Avaya
- Extend all these expectations to their own suppliers.

Where necessary, Avaya works with suppliers to remediate risks and perform additional due diligence to ensure alignment with our expectations and so that we can continue to source responsibly, building on established management processes.

Avaya's Responsible Mineral Policy and subsequent updates are communicated to our supply chain partners and stakeholders via our website and referenced in all new RFPs, contracts, and contract revisions with direct material suppliers. Compliance with this Policy is a requirement for all direct material supplier contracts. Avaya will terminate relationships with suppliers that pose a risk and that do not make substantive and prompt efforts to comply with our policy.

DocuSigned by:  
*Michel Cote*  
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Michel Cote, VP Supply Chain

May 30, 2022

Date

Please use the Avaya Ethics Helpline to share concerns about the content or execution of this policy:  
Phone: 1-877-99-ETHIC (1-877-993-8442) or +1 908-953-7276  
<https://app.convercent.com/en-us/Anonymous/IssueIntake/IdentifyOrganization>

<sup>2</sup> [https://www.avaya.com/en/documents/supplier\\_code\\_conduct.pdf](https://www.avaya.com/en/documents/supplier_code_conduct.pdf)