



Avaya Statement on the Prevention of Modern Slavery & Human Trafficking

Avaya has a longstanding commitment to ethical business conduct in our operations and supply chains and is opposed to all forms of corruption and unethical business conduct. We are committed to treating everyone who works at or with Avaya with dignity and respect. We explicitly prohibit human trafficking and the use of involuntary labor within our supply chain including forced, bonded or indentured labor, involuntary or exploitative prison labor, and other forms of modern slavery.

This statement covers Avaya's Financial Year 2021 ending 30 September. It is made by Avaya UK in accordance with its obligations under section 54 (i) of the UK Modern Slavery Act 2015 (the Modern Slavery Act), constitutes the Modern Slavery Statement 2021 for Avaya UK and demonstrates conformance to the California Transparency in Supply Chains Act of 2010 and the U.S. Federal Acquisition Regulation 52.222. It communicates Avaya's policies and practices to respect human rights and how we identify and address potential impacts, mitigate risks and create an environment in which human rights flourish. Avaya upholds and respects human rights as contained in international norms and standards including the United Nations Universal Declaration of Human Rights (UDHR), the eight Core Labour Conventions developed by the International Labour Organization (ILO) and Organization for Economic Cooperation and development (OECD) Guidelines for Multinational Enterprises.

For the purposes of this statement, any reference to Avaya is a reference to each and every subsidiary within Avaya Holdings Corp. (including Avaya UK), as modern slavery has no place in our global operations.

Our Business

Avaya is a global leader in digital communications products, solutions and services for businesses of all sizes, delivering its technology predominantly through software and services. We enable organizations around the globe to succeed by creating intelligent communications experiences for our clients, their employees and their customers. Avaya builds innovative open, converged unified communications and collaboration ("UCC") and contact center ("CC") software solutions to enhance and simplify communications and collaboration in the cloud, on-premises or a hybrid of both. Our global, experienced team of professionals delivers award-winning services from initial planning and design to seamless implementation and integration, to ongoing managed operations, optimization, training and support.

Avaya sells directly through its worldwide sales force and indirectly through its global network of channel partners, including distributors, service providers, dealers, value-added sellers, system integrators and business partners that provide sales and services support.

The Company outsources the design of some, and the manufacture of substantially all, of its products and solutions.

Our Supply Chain Network

We source from a global network of suppliers and partners. Suppliers provide parts that go into our products and contract manufacturing partners assemble and test finished Avaya products and provide logistical services. We are environmentally conscious in our selection of materials, packaging, and transportation modes and see continual improvement as key to our supply chain approach as we work to optimize our network and business processes.

Policies

Avaya's policies and approach to preventing involuntary labor and human trafficking are based on international standards and industry best practices. Specific policies include:

- **Avaya Code of Conduct** - Our ethics program is built on a lifecycle associated with the principles of prevention, detection, and remediation. Our compliance teams work closely with our business stakeholder groups to assess, manage and mitigate compliance risk by taking appropriate actions. In addition, our compliance teams collaborate with the business



to identify and thoroughly investigate issues of misconduct, identify the root cause and take corrective measures when needed. Avaya's Code of Conduct is the foundation of our

program and covers a variety of topics including an overview of our guiding principles and information on how to conduct business in a manner that complies with the law. It is a global resource that ensures employees not only comply with the law, but they do the right thing, the right way, for the right reason.

Supplier Code of Conduct - As an affiliate member of the Responsible Business Alliance (RBA)--a nonprofit coalition of electronics companies committed to supporting the rights and well-being of workers and communities engaged in the global electronics supply chain - we commit publicly to the RBA Code of Conduct (Code) and actively pursue conformance to the Code and its standards throughout our supply chain. We regard the Code as a total supply chain initiative and issue the Avaya Supplier Code of Conduct as a statement of our expectation that all Suppliers and their employees understand and exhibit a dedication to integrity and ethics. All Avaya suppliers are required to comply with our [Supplier Code of Conduct](#) which includes provisions related to labour and working conditions.

- **Conflict Minerals Policy** - Avaya's Conflict Minerals Policy reaffirms our commitment to upholding and respecting human rights for all people, including those who work in the earliest parts of our supply chain. Our goal is to work collaboratively with suppliers to source minerals consistent with our values around human rights, business ethics, labor, health and safety practices and environmental responsibility.
- **Global Diversity Equity and Inclusion Policy** - Given the links between diversity, equity, inclusion and modern slavery, our Global DEI Policy supports our long-term strategy and near-term priorities, including the launch of a Global Diversity, Equity, Inclusion & Belonging (DEIB) Council to progress our mission to build a workplace where individuality is celebrated and harnessed...where we create a culture of engagement, innovation and inclusivity.
- **Ethics Helpline** - A critical component of our ethics and compliance program is ensuring that our employees, customers, partners, and suppliers know they can raise any concern through our Ethics Helpline, which allows anonymous reporting of alleged illegal and unethical behavior without fear of retaliation.

Risks of Modern Slavery and Human Trafficking

Our business is conducted with suppliers in a variety of global contexts, including in countries where local laws may not exist to protect vulnerable populations. As a downstream user of minerals, Avaya contracts the manufacture of products with electronic manufacturing suppliers. We do not have direct relationships with the mines and/or the smelters and refiners, providing the minerals. We realize that some mine operations can pose serious human rights risks.

In addition to outlining our expectation for suppliers to uphold human rights through policy, Avaya undertakes a variety of actions to identify risks and prevent modern slavery in our organization's manufacturing supply chain and business operations:

1. **Verification:** We evaluate and address risks of human trafficking and slavery through the following three methods:
 - a. The Supplier Self-Assessment Questionnaire (SAQ). The SAQ is completed by Avaya annually for RBA membership and upon request by Avaya suppliers. It is a self-evaluation that documents existing company policies and procedures as compared to the Code requirements.
 - b. The Verified Audit Process (VAP). The VAP are audits carried out on suppliers' facilities, by independent, third-party auditors specially trained in social and environmental auditing and the RBA VAP audit protocol. These audits help to ensure consistent, industry-wide standards. We review available VAP audit results.



- c. Avaya participates in the global Conflict Free Source Initiative, an initiative developed by the RBA and the Global e-Sustainability Initiative (GeSi) by using the Conflict Minerals


Reporting Template which facilitates obtaining the country-of-origin information for target minerals from smelters and refiners of tin, tungsten, tantalum and gold as these target minerals have been implicated in slavery and human rights violations. Smelters and refiners are declared conflict-free if verified through an independent third-party audit that they have implemented systems to ensure sourcing of conflict-free materials.

2. **Supplier Audits:** The approaches listed above help us determine which suppliers may need to be audited by identifying risk levels for slave labor or human trafficking practices. The VAP is a comprehensive assessment of supplier’s implementation of the RBA Code including labor, health and safety, environment, ethics, and management systems. It incorporates audit techniques such as on-site inspections, document reviews, and worker and management interviews. We analyze VAP audit reports findings through RBA’s audit sharing system (the audit reports are valid for two years). Additionally, as part of our contractual agreement with suppliers, we reserve the right to make unannounced visits at supplier facilities upon our discretion for the purpose of carrying out supplier audits.
3. **Certification:** Section E of the RBA Code requires companies to have a management system that contains “a process to communicate the code requirements and to monitor supplier compliance to the code.” This does not mean that suppliers submit certifications. However, we expect evidence such as written documentation to be provided if requested to substantiate supplier claims and/or audit findings.
4. **Internal Accountability:** Noncompliance with the RBA Code on slavery and trafficking is taken seriously. It is one of the most severe types of nonconformance and corrective action plans to remedy identified instances of nonconformance are expected to be implemented in the shortest possible timeframe. We reserve the right to terminate relationships with third parties where legally able to do so, including suppliers, who are found to be non-compliant with supplier requirements.
5. **Capacity-Building/Training:** We communicate routinely with our suppliers on issues including but not limited to Code requirements, and expectations around human trafficking. Specific training is provided for Avaya employees engaged in sourcing and procurement to help them spot and report issues. Additionally, RBA members can leverage the Learning Academy, which contains online learning modules that cover the RBA Code of Conduct, as well as modules specifically related to the California Transparency in Supply Chains Act.

Sourcing Minerals Responsibly

To help address the human rights risks in our mineral supply chain, we have implemented a due diligence process that aligns to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Details about this and the results of our work can be found in our [Conflict Minerals Report](#).

This Statement has been reviewed and approved by the Board of Directors of Avaya UK on 10th March 2022.

Signed by  on behalf of Avaya UK

March 15, 2022 | 10:14 AM EDT

Date: