



Avaya LLC

# AVAYA MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

May 2024

Updated July 2024 to incorporate Avaya UK and Avaya Australia Pty. Ltd. approvals.



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## Introduction

This Statement describes the actions taken by Avaya LLC (Avaya, we, or our) to assess and address modern slavery and human trafficking risks in our operations and supply chains, pursuant to the [Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act](#) (the Canadian Act), [the United Kingdom \(UK\) Modern Slavery Act](#), and the [Australian Modern Slavery Act](#) (Cth) 2018. Avaya LLC is submitting this report on behalf of our Canadian (Avaya Canada Corp., Avaya Cloud Canada, and 3102455 Nova Scotia Company<sup>1</sup>), our UK (Aurix Ltd., Avaya Capital Ireland (UK Inc.), Avaya ECS Ltd., Avaya International Holdings Ltd., Avaya UK, Avaya UK Holdings Ltd., Esna Technologies Ltd., and Ubiquity Software Corp. Ltd.), and our Australian (Avaya Australia Pty. Ltd) entities.

All of the actions by Avaya LLC described throughout this Statement are representative of the subsidiaries' management of modern slavery and human trafficking risks, as they utilize the same corporate policies and processes.

This is Avaya's first statement under the Canadian and Australian Acts. Avaya has previously issued UK Modern Slavery Statements. This Statement compiles information to address each law's respective requirements. A mapping of the different sections of the report to each law's reporting requirements is available in Annex 1.<sup>2</sup>

This Statement has been prepared for the financial year 2023 (FY23), ending in September.<sup>3</sup> It communicates Avaya's policies and practices to respect human rights and how we identify, assess, mitigate, and remediate actual and potential impacts. Avaya upholds and respects human rights as contained in international law and standards, including the United Nations Universal Declaration of Human Rights (UDHR), the eleven fundamental instruments developed by the International Labour Organization (ILO), and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. Throughout this Statement, we reference "modern slavery and human trafficking"<sup>4</sup>, of which the former encompasses both child labour<sup>5</sup> and forced labour<sup>6</sup>.

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<sup>1</sup> While this is formally an Avaya entity, it does not own any intellectual property and has no employees, ongoing deals/transactions, or relevant financial information.

<sup>2</sup> We are in the process of gathering the necessary approvals and signatures to adhere to the requirements of the UK and Australian Acts and intend to submit a revised report when this is completed.

<sup>3</sup> Avaya's FY23 is 1 October 2022 – 30 September 2023.

<sup>4</sup> "Human trafficking is defined as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs" ([ILO.org](#)).

<sup>5</sup> "Child labour is any work that deprives children of their childhood, their potential and dignity, and that is harmful to physical and mental development" ([ILO.org](#)).

<sup>6</sup> "Forced labour is defined as "all work or service that is exacted from any person under the menace of penalty and for which the said person has not offered himself voluntarily"" ([ILO.org](#)).



## Our Business

### Our Structure, Activities and Operations

Avaya is a global digital communications products, solutions, and services provider, leading in customer experience and communications solutions and helping organizations drive momentum by creating unmatched customer and employee experiences. We offer our customers software solutions and a suite of electronic hardware products.<sup>7</sup>

We are headquartered in Morristown, New Jersey, United States, with operations across Asia Pacific (APAC), Central America and Latin America (CALA), Europe, Middle East and Africa (EMEA), and North America (NAR). Avaya became a private company in May 2023 following restructuring. Previously, Avaya was a publicly listed company trading on the New York Stock Exchange as (NYSE: AVYA).

At the end of FY23, we had 6,338 direct employees (6,274 full time employees and 64 part time employees) globally. Of those employees, 246 are in Canada, 56 are in Australia and 218 are in the UK. In addition to our direct employee base, we are supported by 3,757 external contractors, which includes consultants, interns, and staff supplementation roles, among others.

### Activities

Avaya is a global leader in digital communications products, solutions, and services for businesses of all sizes. We help our customers enhance and simplify collaboration in the cloud, on-premises, or a hybrid of both by creating converged contact center and unified communications and collaboration (UCC) and contact center (CC) software solutions. We also offer hardware and gateway solutions which include a range of devices such as telephones and video conferencing units that enhance collaboration and productivity, and position organizations to incorporate future technological advancements. The complete list of our hardware products that were imported into Canada includes servers, cameras / videoconferencing units, telephones (including cordless units, conference phones, and desktop phones), gateways, and Internet Protocol (IP) external expansion modules. In FY23, we imported a combined total of 98,832 product units into Canada.

Our Avaya Canada Cloud entity is used to sell our regulated products and services in Canada, including our telecommunications equipment that must comply with Canadian Radio-Television and Telecommunications Commission (CRTC) and Canadian industry standards. Avaya Canada Corp. is used for anything else that does not fall under the Avaya Canada Cloud's purview, including software solutions, customer support services, and business communication services that do not fall under specific regulatory oversight. The

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<sup>7</sup> Per the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, reporting requirements are applicable to, "entities producing goods in Canada or elsewhere or importing goods produced outside Canada." In accordance with the definition of goods in the Canadian Act's official guidance, only Avaya's hardware fall under the purview of the Canadian Act and are therefore subject to the reporting requirements. Our software services are not subject to the reporting requirements.



third entity, 3102455 Nova Scotia Company, does not currently serve any active function in Canada.

Avaya sells our hardware and software services products directly through a worldwide sales force and indirectly through our global partner network, including distributors, service providers, dealers, value-added sellers, system integrators, and business partners that provide sales and services support.

## Supply Chain

Avaya has a large supply chain that consists of multi-layered networks comprised of directly contracted suppliers and sub-tier (Tier N+) suppliers. We procure goods and services for manufacturing our branded hardware products, our daily operations (e.g., employee computers) and our resale program for goods manufactured by third parties, among other procurement categories. In FY23, our key direct hardware vendors manufactured goods across China, Taiwan, the United States, Singapore, Poland, and Mexico.

Our hardware production relies on our global network of suppliers and partners. Avaya-branded products are assembled, tested, and logistically managed by our key contract manufacturing partners (our partners), who are wholly responsible for the production and support the logistics of our branded products. While we provide our partners with a list of approved vendors determined based on quality specifications for key components of our branded products (e.g., displays), the contract manufacturers control the rest of the material inputs into our products.

In addition to our key contract manufacturers, we have a supplier network that we use to procure our products that come from other large-name brands which we then sell as-is or re-brand with our name (e.g., servers), as well as smaller vendors who make small products specifically for Avaya (e.g., a power adaptor). As with our partners, the suppliers who we source smaller products or rebranded products control their own supply chain for material inputs. The finished products are then sent to our contracted warehouses where they remain until distribution. We have warehouses in the United States, Germany, and near Hong Kong.

## Our Policies and Due Diligence Processes

### Relating to Modern Slavery and 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 any form of modern slavery within our supply chain including forced, bonded or indentured labour, involuntary or exploitative prison labour, and child labour.

We are an affiliate member of the Responsible Business Alliance (RBA), a nonprofit coalition of electronics companies who are committed to supporting the rights and wellbeing of workers and communities in the global electronics supply chain. As RBA members, we



publicly commit to the organization's Code of Conduct (the Code) and pursue its standards through our operations and supply chain, including by implementing the Code's principles into our policies and processes. In addition to alignment with the Code, we have access to a range of RBA training and assessment tools to support the continuous improvement of social and ethical performance in our supply chain.

Avaya's policies and processes in relation to modern slavery and human trafficking include the Human Rights Statement Supplier Code of Conduct (the Supplier Code), Responsible Minerals Policy, and Conflict Minerals Report. As of May 2024, we are in the final stages of drafting and approving a human rights policy that articulates our overarching and ongoing approach to human rights due diligence in line with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

## Human Rights Statement

Our [Human Rights Statement](#) expresses our commitment to preventing the use of modern slavery, and human trafficking in our operations and supply chains. The Human Rights Statement is aligned with the Universal Declaration of Human Rights and is guided by the RBA's Code of Conduct.

### *Human Rights Due Diligence Processes*

Per our Human Rights Statement, Avaya may take the following steps to identify risks and prevent modern slavery in our manufacturing supply chain and business operations:

1. Evaluate and address the risks of modern slavery in our operations and supply chains by completing a Self-Assessment Questionnaire (SAQ) about our existing company policies and procedures relative to RBA's requirements; review Validated Assessment Program (VAP) results that are available from our suppliers; and participate in the RBA and Responsible Minerals Initiative (RMI) to obtain country of origin information about conflict minerals in our supply chain.
2. Leverage the findings from the first step to identify suppliers who demonstrate higher risks of modern slavery practices.
3. Engage with suppliers and, ultimately, reserve the right to terminate relationships with suppliers who are non-compliant with the Code and with our own employees and contractors who fail to comply with the established expectations.
4. Continuously engage with our sourcing and procurement colleagues on key human rights topics.

Available RBA VAP reports for assessments conducted in 2022 and 2023 on companies within our supply chain identified indicators of modern slavery (such as the payment of recruitment fees and excessive working hours). We are engaging with external experts to conduct additional due diligence of these companies to help us validate the findings and confirm the existence of these risks at the facilities used by Avaya. We will continue to leverage our participation in the RBA to identify and manage these risks and engage with our suppliers on their human rights management and compliance with the Supplier Code of Conduct.



## Grievance Mechanism

As part of our ethics program, we operate an [Ethics Helpline](#) that reflects and embodies our high standards of integrity and ethical conduct. Our ethics program is built on the principles of prevention, detection and remediation and is a key component of our ability to identify risks and take corrective measures when needed. Our Ethics Helpline ensures that our employees, customers, business partners, and suppliers can raise any concern – including concerns relating to unfair labour practices and other indicators of modern slavery and human trafficking with us.

### *Associated Due Diligence Processes*

All employees are encouraged to reach out to their managers or our Ethics & Compliance team to make reports if they feel comfortable to do so. In addition, our Ethics Helpline is available to all Avaya stakeholders, including employees, business partners, our suppliers and their employees, and local community members in which Avaya operates. Reports can be made 24/7 via phone or online and are multilingual, non-retaliatory, and maintain anonymity for reporters. In addition to the helpline, we also offer local reporting options for our EU-specific operations. This reporting information is accessible on our website and communicated to our suppliers via email when they are onboarded. We provide further information on how we process reports in the below section on Access to Remedy.

## Supplier Code of Conduct

Our modern slavery and human trafficking-related expectations are communicated to suppliers through our [Supplier Code of Conduct](#) and [Responsible Minerals Policy](#) (see below). The Supplier Code is informed by the RBA's Code of Conduct and includes provisions on the prohibition of modern slavery and human trafficking, and other internationally recognized human rights and labour frameworks. Our suppliers are required to comply with the Supplier Code. It is a contractual requirement written into every agreement we enter, and all new suppliers we onboard are required to review and agree to the Supplier Code.

The Supplier Code also requires that our suppliers establish a management system designed to ensure their compliance with applicable laws and regulations, conformance with the Supplier Code and the identification and mitigation of risks relating to the Supplier Code.

### *Associated Due Diligence Processes*

Our Procurement team is responsible for managing our suppliers. We require all new suppliers to complete a compliance questionnaire during onboarding. The questionnaire asks suppliers about their geographic locations, goods and services, political exposure and anti-bribery and corruption processes. We use the Corruption Perception Index (CPI) to determine if the supplier operates in a high-risk country and use a risk-based approach to ensure higher risk vendors undergo further due diligence.

We also conduct bi-annual due diligence on a sample of approximately 25 existing suppliers based on their risk profile (informed by annual spend, CPI, and the type of service provided). We ask suppliers to complete a detailed compliance risk assessment and use an external service to rank each supplier and prioritise high risk suppliers. High risk suppliers complete an additional questionnaire which includes a question about the management and



presence of modern slavery and human trafficking in their operations. High risk suppliers are flagged to our legal representative in the area where the company operates and are consistently monitored by the external service.

In general, Avaya only onboards one to two hardware suppliers per year at most. Vetting and onboarding processes for new suppliers are primarily focused on financial and product quality, data privacy, and compliance risk. We aim to embed human rights and modern slavery risks in these checks going forward.

## Responsible Minerals Policy and Conflict Minerals Reporting

Our [Responsible Minerals Policy](#) formulates our commitment to responsible sourcing of “conflict minerals” including tin, tantalum, tungsten and gold (also referred to as 3TG) among our supply chain and creates a framework for collaboratively working with our supply chain to source minerals in a way that is consistent with our ethical values. The Responsible Minerals Policy establishes suppliers’ responsibility to identify the sources of conflict minerals and declare the conflict mineral status of their products.

The Responsible Minerals Policy underpins the inputs into our annual [Conflict Minerals Report](#), which summarizes our due diligence processes for suppliers beyond Tier 1 who source conflict minerals.

### *Associated Due Diligence Processes*

While Avaya does not purchase minerals directly from the smelters producing the minerals, many of our electronic hardgoods rely on 3TG. Our conflict minerals due diligence process aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) five step framework (see below). The work is conducted in collaboration with the Responsible Minerals Initiative (RMI), a leading organization for advancing responsible conflict minerals supply chains. The RMI’s conflict minerals work is underpinned by the Responsible Minerals Assurance Process (RMAP), which is a framework developed by the RMI to help companies ensure responsible conflict minerals sourcing, particularly those from conflict-affected and high-risk areas.

To help advance the transparent sourcing of conflict minerals among our supply chain, we leverage three key elements of the program:

1. Determine product applicability
2. Conduct a reasonable country of origin inquiry (RCOI)
3. Initiate due diligence on relevant suppliers (determined by steps one and two)

The first element of the program, determining product applicability, involves generating a list of products and parts that were manufactured for Avaya, sold by us in the previous year, and contain 3TG. If suppliers fulfill all of the three elements, they are considered in-scope.

The list of in-scope suppliers is then sent a Conflict Minerals Reporting Template (CMRT) which requests information about suppliers’ conflict minerals sourcing, including declaration of minerals in products and the product and smelter list. The RMI provides a list of known smelters in the CMRT, which allows suppliers to identify their respective smelter supplier





and the smelter’s associated country of origin. In addition to the CMRT results, we also leverage the RMI’s RCOI database to determine country of origin, as well as other publicly available resources that identify origin countries like the London Bullion Market Association (LBMA) and the Responsible Jewelry Council (RJC). These inputs are reviewed to identify suppliers that require additional information and further due diligence.

Upon identifying the suppliers who require additional information, we then apply the OECD Guidance’s five-step framework:

1. **Establish strong company management systems:** Avaya communicates our Responsible Minerals Policy to in-scope suppliers to ensure they are aware of their obligations to comply with the full scope of expectations of the Policy and RMAP procedures.
2. **Identify and assess risks in the supply chain:** We evaluate the RCOI database to assess whether our suppliers participated in the conflict minerals audit process. The audit process validates or identifies non-compliance with the responsible minerals sourcing standards.
3. **Design and implement a strategy to respond to identified risks:** We leverage our close collaboration with the RBA and RMI to continue to access RMAP audits and address non-conformant supplier recommendations, including dis-engagement or suspension.
4. **Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain:** Avaya utilizes the RMAP’s third-party audits to identify social compliance risks along the conflict minerals supply chain.
5. **Report on supply chain due diligence:** We work with an external consultant to prepare the annual Conflict Minerals report to document and disseminate our supply chain due diligence activities.

We conduct this due diligence annually on our relevant suppliers, as our responsible minerals work is our primary human rights due diligence mechanism. Although the RMAP process does not solely focus on modern slavery in the conflict minerals supply chain, it does contain multiple provisions for elements of modern slavery (namely, forced labour and child labour). Below, we have outlined the key standards relating to the prevention of forced labour and child labour that are reviewed as part of the RMAP process.

### The RMAP’s Standards for Forced Labour and Child Labour

Forced Labour	Child Labour
<p>A management system that prevents the use of any forms of forced labour and participation in acts of human trafficking, including:</p> <ul style="list-style-type: none"> <li>• Documented policies prohibiting forced, bonded, indentured, and involuntary prison labour;</li> <li>• Zero tolerance for requiring workers to pay employment or recruitment fees;</li> <li>• Contracts detailing the conditions of employment are provided in the employee’s native language;</li> <li>• Workers are provided a copy of their employment contract prior to leaving their country of origin;</li> <li>• The employment agreement is not changed unless changes are to meet local law and provide equal or better terms;</li> </ul>	<ul style="list-style-type: none"> <li>• Documented policies banning the use of child labour;</li> <li>• Implementation of at least one of the following (whichever is more stringent)                             <ul style="list-style-type: none"> <li>○ National, subnational, or local legal requirements for child labour; or</li> <li>○ A management system that prevents the employment of children under 15 and prevents exposure of employees under the age of 18 to hazardous working conditions.</li> </ul> </li> <li>• Written policies and procedures for remediation of child laborers that include</li> </ul>



<ul style="list-style-type: none"> <li>• All work is voluntary and workers are free to leave at any time without penalty, given reasonable notice as per the employment contract;</li> <li>• Government-issued identification and personal documents are not held by the employer, labor agent, or contractor;</li> <li>• Employers can only hold documentation if required by law, and employees cannot be denied access to their documents; and</li> <li>• There are no unreasonable restrictions on the movement of workers and their access to basic liberties.</li> </ul>	<p>adequate financial and other support to enable children to attend and remain in school; and</p> <ul style="list-style-type: none"> <li>• Established procedures ensuring young works are subject to compulsory education laws and they only work outside of school hours.</li> </ul>
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## Our Risk Context

### Modern Slavery and Human Trafficking Risks

Due to the nature of our work in the technology industry, we recognise that elements of our direct operations and supply chain may carry risks of modern slavery and human trafficking, including (1) our extended supply chain, (2) our use of third-party / labour recruitment agencies and (3) our outsourced labour functions.

We have assessed that our hardware activities carry the greatest risk of modern slavery and human trafficking. In particular, the use of conflict minerals in our hardware products is a salient risk. As such, much of our due diligence on these risks relates to our upstream supply chain.

### Supply Chain Risks

Modern slavery and human trafficking are salient issues in the electronic manufacturing sector, particularly in China, a leading electronics exporter to Canada and the United States. Child labour is a frequent occurrence, particularly in electronics that use raw materials like cobalt and mica. Children are reported to work in hazardous mining conditions in Africa (e.g., cobalt), Asia, and Latin America (e.g., mica). Both raw materials are essential inputs for most electronic products.

Our Supplier Code of Conduct is the cornerstone of our efforts to mitigate these risks. The Supplier Code is embedded in our contractual agreements with suppliers, and it prohibits the use of modern slavery and human trafficking and requires the respect of other internationally recognized human rights and labour rights frameworks. Through our contractual agreement with suppliers, we reserve the right to make unannounced audits to ensure the Code is respected. Similarly, our conflict minerals due diligence aims to identify and address the known modern slavery hazards in the 3TG supply chain.

#### *Tier N+ Supply Chain*

We rely on our two main contract manufacturing partners (our CMs) for the development of our hardware. Our CMs are charged with the sourcing, assembly, testing, and logistics of Avaya’s hardware products. We regularly visit our CMs to assess their processes and the quality of the products.

Limited transparency into supply chains beyond Tier 1 suppliers carries risks of modern slavery and human trafficking. In addition to the previously identified factors within electronic manufacturing supply chains, these supply chains are highly competitive, which can cause companies to seek cheap – often exploitative – labour to fulfill demands or to



outsource labour to unscrupulous third-party manufacturers. Many electronic manufacturing facilities are also located in regions that have weaker labour laws and inadequate enforcement mechanisms, which makes it easier for exploitative work to occur.

We acknowledge the importance of understanding the complete supply chain and its associated risks. To address this, we are working with external expert advisors to expand our management of human rights risks relating to our contract manufacturing operations and our wider supply chains.

## Operational Risks

We aim to mitigate the risks of labour exploitation to our direct employees by conducting extensive background checks on every employee we hire in all of our geographies. Our Ethics Helpline and internal grievance processes also help us identify and address risks of labour exploitation towards our employees. Although we have a number of mechanisms for managing the risk of modern slavery and human trafficking in our activities, such as our Supplier Code of Conduct, we are aware of key inherent risk factors within our operations which include third-party labour providers, contractors and outsourced labour.

### *Contracted and Outsourced Labour*

We employ contract labourers to fill multiple functions, particularly during major hiring initiatives or to fill skills or position gaps at Avaya. We currently employ 3,757 contractors in 43 countries which includes both high-risk and lower-risk geographies<sup>8</sup>, with the highest geographic concentration in India (1,164 workers). Our contractors are primarily high-skill workers, which minimizes the risks of modern slavery and human trafficking. However, we largely rely on third-party labour providers to oversee the workers, meaning that we do not have control over the contractors' employment conditions. The lack of oversight, while low because of the nature of employment, does mean that contract / temporary workers may still be vulnerable to labour exploitation due to job insecurity, limited legal protections, precarious work arrangements, and limited representation or access to rights.

Similarly, Avaya outsources labour for human resources, call centers, transportation, cleaning and building maintenance, and warehousing functions. The outsourced labor is managed entirely by the third-party entities and our reduced oversight of these workers' contracts and conditions limits our leverage to mitigate risks of modern slavery and human trafficking. We are actively working with external experts to identify areas for improvement of our management of risks affecting these workers.

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<sup>8</sup> The complete list of countries that we employ contract labour includes: Argentina, Australia, Austria, Brazil, Canada, China, Colombia, Croatia, Czech Republic, Egypt, France, Germany, Greece, Hong Kong, Hungary, India, Indonesia, Ireland, Israel, Italy, Japan, Kazakhstan, South Korea, Malaysia, Mexico, Netherlands, Philippines, Poland, Portugal, Romania, Russia, Saudi Arabia, Singapore, South Africa, Spain, Taiwan, Thailand, Turkey, Ukraine, United Arab Emirates, United Kingdom, United States, and Vietnam.



## Access to Remedy

### Grievance Mechanisms

Avaya's [grievance mechanisms](#), managed by our Ethics & Compliance team, help us identify breaches of our Code of Conduct in our operations and our supply chains, including risks relating to modern slavery and human trafficking and provide an avenue for remedy.

When a report is submitted, it triggers an email alert to the Corporate Security, Compliance, and Legal teams who review the case. The investigation process can differ depending on the nature of the case, but we will typically start by reaching out to the reporter (via a tool that maintains confidentiality) to request additional details within the first 48 hours of submission. Our investigations can include forensics, interviews, reviews, and other related actions. Upon completion of the investigation, we either close the case due to unsubstantiated findings or take next steps to remediate the case, which differs depending on the situation. All cases go through our Audit Committee and Board for process and findings oversight. We aim to complete these processes and close a case within 60 days.

Our grievance mechanism has a set procedure for tracking relevant performance indicators. We deliver quarterly reports to Avaya's Audit Committee with data about the number of complaints received, the types of complaints, and the resolution and management of cases, among other data points. In addition to the quarterly presentation, we also post the reports on our internal integrity website. We have never received a complaint about modern slavery or human trafficking, and tracking this data is a key metric for the effectiveness of our efforts to mitigate these risks within our operations and supply chains.

### RBA Remediation Policy

As RBA members, our approach to remediating adverse human rights impacts, including modern slavery and human trafficking, that we cause or contribute would be guided by the RBA guidance. In line with our commitment to the RBA Code of Conduct, if modern slavery or human trafficking (including the payment of recruitment fees) is identified in our operations we would provide remediation. The RBA's remediation guidance is tailored to the specific circumstances and needs of affected individuals and communities but is always underpinned by addressing the root cause of the violation, mitigating the harm, and preventing future occurrences.

As explained in the Human Rights Due Diligence section of this Statement, Avaya has identified potential indicators of modern slavery and human trafficking in our supply chain. We are still investigating these issues and as such have not taken any measures to remediate the potential impact of modern slavery, including the loss of income to the most vulnerable families that result from measures taken to eliminate the practice. If we identify actual human rights abuses or the presence of modern slavery and human trafficking, we will follow the RBA's remediation guidance and our commitment to the UN Guiding Principles on Business and Human Rights.



## Consultation

For our first ever globally combined modern slavery Statement, Avaya did not consult with all controlled entities in its development. This is due to our corporate-level policies and procedures representing the full scope of activities that occur for preventing modern slavery and human rights in all our global operations. However, Avaya recognizes the need to comprehensively consult with our controlled entities in the future to ensure our modern slavery and human trafficking management procedures and disclosures are both effective and representative of unique regional contexts. We are focused on developing better ways to more meaningfully and frequently consult our controlled entities as we continue to advance our human rights programs ahead of our second globally prepared Statement in 2025.

## Looking Forward

Avaya aims to embody and promote ethical practices in all aspects of our business. While we have implemented several risk management and due diligence initiatives for ensuring that human rights are respected in our activities and supply chain, we acknowledge that there is room for refinement and improvement. In light of this, we have a number of key plans to continue advancing our human rights risk management processes across our value chain.

First, we will continue to annually report on our conflict minerals supply chains. While we are no longer required to do so as a privately held company, we trust it is an important way to continue promoting the procurement of ethical raw materials.<sup>9</sup> Similarly, our Ethics Helpline offers stakeholders of our entire value chain access to a robust grievance mechanism, and we will continue to monitor and investigate the cases we receive through the helpline. This annual reporting helps us measure the effectiveness of our efforts to reduce modern slavery and human trafficking within our raw material supply chain.

We are also in the final stages of expanding our existing Human Rights Statement into a public facing policy that articulates our overarching and ongoing approach to human rights due diligence in line with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. Additionally, we are updating our company Code of Conduct to include references to human rights expectations of employees, as well as rolling out new human rights training programs. We will be leveraging our partnership with RBA to roll out a mandatory human rights training module for our procurement and human resources team members, as Avaya employees currently do not receive training related to modern slavery and human trafficking.

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<sup>9</sup> Before Avaya became a privately held company in May 2023, we were required to submit an annual conflict minerals report to comply with the Security Exchange Commission (SEC)'s Rule 13(p)(1) of the Exchange Act of 1934.



Finally, we are engaging with external experts to conduct a gap assessment of our current human rights management to identify areas of improvement and design a strategic roadmap for how to do so. We aim to complete this workstream within the first half of 2024.



## Approval and Attestation - Canada

### Approval

This Modern Slavery and Human Trafficking Statement (the Statement) has been reviewed and approved by the Board of Directors of Avaya LLC, acting on behalf of Avaya LLC and on behalf of its indirect, wholly-owned subsidiaries Avaya Canada Corp., Avaya Cloud Canada Inc., and 3102455 Nova Scotia Company.

### Attestation

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Supply Chains Act), and in particular Section 11 thereof, I attest that I have reviewed the information contained in the Statement for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Statement is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Avaya LLC.

DocuSigned by:

*Alan Masarek*

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Alan Masarek  
Director, CEO & President of Avaya LLC  
May 30, 2024



## Approval - UK

### Approval

This Modern Slavery and Human Trafficking Statement dated May 2024 (the Statement) has been reviewed and approved by the Board of Directors of Avaya UK as the UK trading entity, and is applicable to the other UK incorporated Avaya group companies: Aurix Ltd., Avaya Capital Ireland (UK Inc.), Avaya ECS Ltd., Avaya International Holdings Ltd., Avaya UK, Avaya UK Holdings Ltd., Esna Technologies Ltd., and Ubiquity Software Corp. Ltd.

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[Signature]

Lee Hastings

Director of Avaya UK

[Date] July 15, 2024

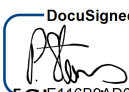




## Approval - Australia

### Approval

This Modern Slavery and Human Trafficking Statement dated May 2024 (the Statement) has been reviewed and approved by the Board of Directors of AVAYA AUSTRALIA PTY LTD.

DocuSigned by:  
  
[Signature]

Patrick Richard John Stevens

Director of Avaya Australia PTY LTD

[Date] July 10, 2024



## Appendix 1: Mapping of Sections to Laws

	Page	Canadian Forced & Child Labour Prevention Act 2023 Part 2	UK Modern Slavery Act 2015 Part 6	Australian Modern Slavery Act 2018 Part 2
<b>Introduction</b>	2	11.2		16.1(a)
<b>Our Business</b>	2-4	11.3(a)	5(a)	16.1(b)
<b>Our Policies and Due Diligence Processes</b>	4-9	11.3(b)	5(b), 5(c)	16.1(d)
<b>Our Risk Context</b>	9-10	11.3(c)	5(d)	16.1(c), 16.1(d)
<b>Access to Remedy</b> (incl. Assessing Effectiveness)	10-11	11.3(d), 11.3(e), 11.3(g)	5(d), 5(e)	16.1(d), 16.1(e)
<b>Consultation</b>	11			16.1(f)
<b>Looking Forward</b> (incl. Training)	12	11.3(f)	5(f)	16.1(g)
<b>Approval and Attestation</b>	13-16	11.4(b), 11.5(b)	6(a)	16.2