



Avaya LLC

2024 Modern Slavery and Human Trafficking Statement

March 2025



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Introduction

This Statement describes the actions taken by Avaya LLC (Avaya, we, our) to assess and address modern slavery and human trafficking risks in our operations and supply chains, pursuant to the 2023 [Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act](#) (the Canadian Act), the 2015 [United Kingdom \(UK\) Modern Slavery Act](#), and the 2018 [Australian Modern Slavery Act](#). This Statement compiles information to address each law's respective requirements. A mapping of the different sections of this Statement to each law's reporting requirements is available in Annex I.

Avaya LLC is submitting this report on behalf of our Canadian (Avaya Canada Corp., Avaya Cloud Canada Inc., and 3102455 Nova Scotia Company¹), our UK (Aurix Ltd., Avaya Capital Ireland, 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 Statement has been prepared for the financial year 2024 (FY24), ending in September². 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"³, of which the former encompasses both child labour⁴ and forced labour⁵.

Our Business

Structure 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 hardware products⁶.

¹ 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.

² Avaya's FY24 is 1 October 2023 – 30 September 2024.

³ "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](https://www.ilo.org/)).

⁴ "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](https://www.ilo.org/)).

⁵ "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](https://www.ilo.org/)).

⁶ 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



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 a restructuring but had been publicly listed on the New York Stock Exchange as NYSE: Avaya.

At the end of FY24, we had 5,383 direct employees (5,337 full-time employees and 46 part-time employees) globally. Of those employees, 230 were in Canada, 41 were in Australia, and 201 were in the UK. In addition to our direct employee base, we are supported by 3,512 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 FY24, we imported a combined total of 46,853 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 the 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 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 FY24, 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

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.



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 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

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 corresponding processes in relation to modern slavery and human trafficking include our Human Rights Policy, Supplier Code of Conduct (the Supplier Code), Responsible Minerals Policy, and Conflict Minerals Report.

Human Rights Policy

Our Human Rights Policy expresses our commitment to preventing the use of modern slavery and human trafficking in our operations and supply chains. The Human Rights Policy is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Associated Due Diligence Processes

Per our Human Rights Policy and in line with the UNGPs, we commit to conducting human rights due diligence to identify, assess, prevent, and mitigate potential and actual adverse human rights impacts that we have caused or contributed to and establish mechanisms to report on and remedy identified adverse human rights impacts where they occur. To do this, we take the following approaches to identify risks and prevent modern slavery and human trafficking in our operations and supply chains.



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.

As of FY24, the RBA VAP reports have not identified any indicators of modern slavery, though we will continue to leverage our partnership with RBA to identify any risks if they develop.

In addition to the specific due diligence steps detailed above, we also conducted a gap assessment of Avaya's human rights policies and practices against the UNGPs. The assessment identified Avaya's current level of alignment with the UNGPs and provided an actionable roadmap about ways to improve alignment and develop a more robust human rights due diligence program. The outputs of the assessment informed key activities for improving our human rights performance in 2025.

Reporting Process

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 & Integrity team to make reports if they feel comfortable doing 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

As a member of the Responsible Business Alliance (RBA), Avaya works to ensure safe and humane labor standards, environmentally responsible business practices, and high ethical standards in our



supply chain. In furtherance of our efforts, Avaya has adopted the [RBA Code of Conduct](#) as our global Supplier Code of Conduct. The Supplier Code, informed by internationally recognized human rights and labour frameworks, reflects the basic tenets of responsible manufacturing agreed upon by the electronics industry, including the prohibition of modern slavery and human trafficking. Our modern slavery and human trafficking-related expectations are communicated to suppliers through the Supplier Code. Compliance with the Supplier Code is a contractual requirement included in every supplier agreement we enter, and all new suppliers 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 prioritize 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, though we are systematically introducing human rights and modern slavery risks in these checks going forward.

In FY24, as part of our efforts to institute more stringent human rights and modern slavery risk management among our suppliers, Avaya also introduced targeted due diligence checks on some new and existing suppliers. Led by human rights experts from a third-party consultancy, these checks utilized a variety of publicly available sources (e.g., news media, NGO reports, stock exchange filings, corporate litigation records) to uncover issues related to labor conditions. When possible, we conducted multilingual searches in relevant languages to capture additional or local-level information. The due diligence process uncovered potential indicators of modern slavery, including ties to sanctioned entities and human rights allegations. We are continuing to collaborate with our third-party experts to assess and manage these risks.

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. The Responsible Minerals Policy creates a framework for collaboratively working with our



supply chain to source minerals in a way that is consistent with our ethical values by establishing 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](#)⁷, 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); and
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 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.

⁷ While our 2024 Conflict Minerals Report has not yet been updated and published, it will follow the same due diligence processes outlined in this section.



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 slavery⁸ (namely, forced labour and child labour).

Our Risk Context

Modern Slavery and Human Trafficking Risks

Due to the nature of our work in the technology industry, we recognize 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

⁸ RMAP Risk Readiness Assessment Criteria: [RRA 3.0 Criteria.pdf](#)



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 reporting 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 3,512 contractors in 44 countries which includes both high-risk and lower-risk geographies⁹, with the highest geographic concentration in India (1,215 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.

⁹ The complete list of countries that we employ contract labour includes: Argentina, Australia, Brazil, Bulgaria, Canada, China, Colombia, Croatia, Czech Republic, Egypt, France, Germany, Hong Kong, Hungary, India, Indonesia, Ireland, Israel, Italy, Japan, Jordan, Kazakhstan, South Korea, Malaysia, Mexico, Netherlands, Philippines, Poland, Portugal, Romania, Russian Federation, Saudi Arabia, Serbia, Singapore, South Africa, Spain, Sri Lanka, Taiwan, Thailand, Turkey, United Arab Emirates, United Kingdom, United States, and Vietnam.



Access to Remedy

Reporting Process

Avaya's [reporting process](#), managed by our Ethics & Integrity 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 reporting process 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 Supply Chain Due Diligence section of this Statement, Avaya has identified potential indicators of modern slavery and human trafficking in our supply chain via the targeted supplier due diligence activities. 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 2024 Modern Slavery and Human Trafficking Statement, Avaya distributed a letter to the relevant controlled entity in Australia outlining the purpose of this Statement, our approach to its



development, and a copy of the document. The letter also explicitly invited feedback or questions regarding the content of the Statement. Additionally, we requested formal confirmation from such entity, affirming that it agreed with the Statement's content or that its input had been adequately addressed and properly incorporated. The consultation letter is included in Annex II of this document.

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.

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. Similarly, our Ethics Helpline offers stakeholders of our entire value chain access to a robust reporting process, 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.

Additionally, we are in the final stages of rolling out a mandatory human rights training program for our procurement and human resources team members, which will be made available to the relevant employee functions in 2025.

Finally, we are engaging with external experts to conduct a supply chain risk assessment and a saliency assessment to enable us to further distill key human rights and modern slavery risks in our operations and supply chains, which will inform subsequent due diligence processes. We aim to complete these two activities by the end of 2025.




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.

[Signature]  Signed by:
A0AE0984B9BB47B...

[Name] Patrick Dennis

[Title] CEO


[Date] April 10, 2025



Approval - UK

Approval

This Modern Slavery and Human Trafficking Statement dated March 2025 (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.

[Signature]  Signed by:
4E8947BD2040414...

[Name] Lee Hastings

[Title] Director - Avaya UK

[Date] April 11, 2025



Approval - Australia

Approval

This Modern Slavery and Human Trafficking Statement dated March 2025 (the Statement) has been reviewed and approved by the Board of Directors of AVAYA AUSTRALIA PTY LTD.

[Signature]  Signed by:
4E5CE49753774EB...

[Name] Phillip Zammit

[Title] GVP APAC

[Date] April 14, 2025



Appendix 1: Mapping of Sections to Laws

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Appendix 2: Consultation Letter

AVAYA LLC
350 Mt. Kemble Avenue
Morristown, New Jersey 07960

April 7, 2025

Avaya Australia Pty Ltd.
Level 2, 123 Epping Road
Macquarie Park
New South Wales 2113
Australia

Consultation Notification for Avaya LLC's 2024 Australian Modern Slavery Act Statement

Dear Avaya Australia Pty Ltd.,

We hope this letter finds you well.

As part of our ongoing commitment to corporate social responsibility and regulatory compliance, we are writing to inform you of the upcoming annual update to our Modern Slavery and Human Trafficking Statement¹⁰ (the Statement). In alignment with the requirements established by the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, Australian Modern Slavery Act, and United Kingdom (UK) Modern Slavery Act, the joint statement outlines Avaya LLC's and its subsidiaries' actions taken to address and combat modern slavery risks within our operations and supply chains.

As a sub-entity that is listed in this Statement due to your operation in Australia, we want to ensure that you are provided with the opportunity to be informed about the contents of the Statement. In addition to this letter, we have provided you with a copy of the Statement for your review.

Opportunity for Feedback

This Statement was developed with the help of third-party experts with the aim of reflecting the management of modern slavery and human rights risks throughout all our global business operations (including sub-entity activities). To ensure the information is as accurate as possible, we welcome any comments or suggestions related to the Statement. Your feedback can help us further refine and strengthen our approach to addressing modern slavery risks across the entire group.

¹⁰ Please find the Statement for FY23 here: [Avaya Modern Slavery and Human Trafficking Statement](#)



If you wish to provide any feedback or ask questions regarding the Statement, please contact the Environmental, Social and Governance (ESG) team at esg@avaya.com by April 9, 2025.

Should you wish to schedule a meeting to discuss any aspects of the statement, we would be happy to find a time to meet with you.

Acknowledgement of Receipt

If you have no further feedback or if your inputs have been adequately addressed and embedded in the Statement by the Avaya LLC reporting team, please complete the acknowledgement below and return it to esg@avaya.com.

We greatly appreciate your attention to this matter and timely review of the attached Modern Slavery and Human Trafficking Statement. Your cooperation and feedback will be greatly valued as we work together to uphold the highest standards of corporate responsibility.

Thank you for your continued support and partnership.

Yours sincerely,

Sara Bucholtz
Secretary of Avaya LLC

Attachment: 2024 Modern Slavery and Human Trafficking Statement

* * * * *

Acknowledgement:

The Statement referenced above and the content therein was approved by _____ in his or her role as one of the Directors of Avaya Australia Pty. Ltd. on _____.