



## Modern Slavery Act Transparency Statement

This statement is made in relation to the Avaya group of companies which includes the UK trading company, Avaya UK.

Avaya provides communication systems, applications and services for enterprises, including businesses, government agencies and other organizations. Our products include Internet Protocol (IP) telephony systems and traditional voice communications systems, multi-media contact center infrastructure and applications in support of customer relationship management, unified communications applications and appliances, such as IP telephone sets. We support our broad customer base with comprehensive service offerings that enable our customers to plan, design, implement, monitor and manage their communications networks.

Our customers include enterprises operating in a broad range of industries, including financial services, manufacturing, media and communications, professional services, healthcare, education and government.

### Avaya Human Rights Policy

Avaya believes in the dignity of freely chosen work as expressed in the United Nations Declaration of Human Rights. We are committed to identifying risks and preventing the use of child labor, slavery and human trafficking in our business operations and supply chain. Our Human Rights policy, processes and procedures are implemented to be in conformance with governmental requirements such as Section 3 of the California Transparency in Supply Chains Act of 2010, the United Kingdom (UK) Modern Slavery Act 2015, Chapter 30, Part 6, Provision 54, and the U.S. Federal Acquisition Regulation 52.222-50.

### Process

Avaya is 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. As a participant in this leading organization, we commit publicly to the [RBA Code of Conduct](#) (Code) and actively pursue conformance to the Code and its standards throughout our supply chain. Our adoption of the Code is evident on our website at ([http://www.avaya.com/usa/documents/supplier\\_code\\_conduct.pdf](http://www.avaya.com/usa/documents/supplier_code_conduct.pdf)) and is adopted by suppliers as part of the supplier contract process.

The Code defines human trafficking under Section A.1 within its provisions for Freely Chosen Employment. It states that forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used and it outlines necessary management systems to ensure workers' rights are protected. The RBA also convenes regular teleconferences, webinars and other meetings that educate members on how to identify monitor and prevent risks associated with labor recruitment practices.

Steps taken by Avaya to identify risks and prevent modern slavery in the organization's manufacturing supply chain and business operations include:

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 e as compared to the Code requirements.
  - b. The Verified Audit Process (VAP). The VAP are audits carried out on suppliers' facilities, which are completed 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 that are available from suppliers.
  - 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 timeline. 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. Our own employees and contractors are required to adhere to our Code of Conduct (Operating with Integrity), which references the RBA Code requirements and strictly prohibits human trafficking behavior.

Employees or contractors suspected of human trafficking activities will be investigated and violations are grounds for immediate termination. Any employees or contractor who suspects that human trafficking violations are taking place in Avaya business operations or in the supply chain are urged to report activities to our Ethics Hotline at 1-877-99-ETHIC (1-877-993-8442), if U.S.-based, or to +1-908-953-7276 if located outside of the U.S.

5. Capacity-Building/Training: Avaya suppliers also receive information on the Code requirements, and expectations around human trafficking during our annual Supplier Day Summit, an annually gathering of Avaya suppliers from around the globe. 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.

The RBA Code is a fundamental part of our efforts to ensure that slavery and human trafficking are not taking place in our supply chains and our own business. This summarizes the efforts Avaya takes in our own business and our suppliers to eradicate child labor, slavery and human trafficking from our supply chain. These efforts, as well as this disclosure, are reviewed by the Avaya board of directors annually and updated as required.

Avaya UK has a year end date of 30<sup>th</sup> September and the existing Avaya statement was modified and re-posted on September 9, 2018. -This is an update to that statement that has been reviewed and approved by the Board of Directors of Avaya UK on 15th April 2019.

Signed by: E. Hunter

**Ena Hunter**  
Legal Director  
on Behalf of Avaya UK

Date: 17th April 2019

