Mitel

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement for Mitel Networks Limited ("Mitel") for the financial year ending December 31, 2021.

Mitel is committed to ensuring that we conduct our business in a way that supports the prevention of modern slavery and human trafficking, including through our supply chain. We strive to ensure that our business and supply chain reflect our values, which include the respect for human rights and a belief that everyone should be treated with dignity and respect. We continuously aim to improve our practices to combat modern slavery and human trafficking and to work with and encourage our suppliers to uphold these principles. More specifically:

- Mitel has a Code of Business Conduct and a Global Ethics and Compliance Hotline. Our Code of Business Conduct establishes ethical business conduct as critical to our business and our expectation of compliance with applicable laws. It enables and encourages employees to escalate any violations of which they become aware. Annual, monitored training is provided to all Mitel employees to reinforce these principles and expectations and the awareness of our Code of Business Conduct in general.

- While all Mitel employees are required to respect the principles on human rights and labour standards pursuant to our Code of Business Conduct, we additionally would not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour or that would otherwise refuse to comply with the requirements at stake.

- Our main manufacturing suppliers are members of the Responsible Business Alliance (RBA) and/or have agreed to follow the RBA Code of Conduct. The RBA Code of Conduct establishes standards to ensure that working conditions in the electronics industry supply chain are safe, that workers are treated with respect and dignity and that business operations are conducted ethically.

- We consider that our exposure to modern slavery and human trafficking shall be decreasing as we continue to consolidate our manufacturing suppliers to tier one contract manufacturers, all of them following the RBA code of conduct.

- We believe that, within Mitel, the risks related to modern slavery are moderate, and no incident related to forced labour or human trafficking in our organisation or supply chain was identified by Mitel in 2021.

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This statement was approved by the Directors of Mitel Networks Limited on 25 May 2022

Signed on 25 May 2022 on behalf of Mitel Networks Limited by:

Gregory J. Hiscock,

Director – Mitel Networks Limited