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MITEL STATEMENT ON FIGHTING MODERN SLAVERY

INTRODUCTION

We believe that success is not only about industry performance; it is about making a positive impact on society through our business practices. Global impact requires thoughtful, positive choices - when we know better, we do better.

Mitel strictly prohibits situations of exploitation where adults or children cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power. Forced labour and child labour are egregious forms of modern slavery - they represent some of the most pervasive forms of human rights abuse in our society.

We are committed to identifying and addressing human rights risks, including modern slavery, within our business activities and supply chain.

This Statement is designed to meet Mitel's reporting obligations under the United Kingdom *Modern Slavery Act 2015*.

While this statement is made by Mitel Networks Limited - a private company incorporated in the United Kingdom and headquartered in London - on behalf of itself, Mitel and its affiliates ("Mitel") share business operations and supply chains, as well as the policies and processes further described in this Statement.

In this Statement, we report on the progress made over the course of 2023 and outline our plans for the year ahead.

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MITEL BUSINESS AND SUPPLY CHAIN

Specializing in business communication, Mitel focuses on cloud, enterprise, and next-generation collaboration applications, serving approximately 35 million customers in 100 countries. Our products and services are sold directly and indirectly through a variety of channel partners.

By the end of 2023, Mitel had approximately 4,887 full-time employees across 30 countries, striving to pay a living wage to all employees.

Mitel's business and service model involves manufacturing, distribution and provision of end user services, telecommunication devices, and associated software resulting in a globally extensive supply chain network. Our suppliers range from small private companies to publicly listed multinational companies.

Our supply chain network includes:

- Manufacturing partners: Develop Mitel's final products based on our specifications;
- OEM Suppliers: Supplies finished goods sold by Mitel as a part of the service (for the purposes of this Statement, manufacturing partners and OEM suppliers shall be referred to as "Category 1 Suppliers");
- Parts suppliers: Provides the electronic and non-electronic components and parts ("Category 2 Suppliers"); and
- Logistics and services: Logistic providers, warehousing services, etc. ("Category 3 Suppliers").

Each of our Category 1, 2 and 3 Suppliers has its own extensive supply chain (particularly Category 1) connecting us to thousands more business and employees worldwide.

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TOOLS USED IN IDENTIFYING, ASSESSING AND ADDRESSING MODERN SLAVERY RISKS

Policies

Mitel is committed to respecting human rights, guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Our policies align with the standards put forward by the International Labor Organization (ILO) to prevent modern slavery and workplace safety. Mitel's specific policies include:

- Mitel Code of Conduct: Mitel's Code of Conduct guides our Board of Directors, executives, employees, and contractors in conducting internal and external duties ethically and honestly in all business aspects including human rights and prevention of modern slavery. Employees certify compliance annually.
- Mitel's Policy on Conflict Minerals: Mitel's policy on conflict minerals shows our commitment to avoid sourcing of minerals from mining regions where human rights violations occur. Mitel conducts assessment audits based on the Conflict Minerals Reporting Template (CMRT) on our supply chain to ensure commodities from the conflict regions are not included in our supply chain.
- Procurement Policy: Mitel's procurement policy helps employees in streamlining supplier selection and due diligence process which includes social and ethical standards the suppliers follow on their workplace, among other major selection factors.
- Supplier Code of Conduct: The Supplier Code of Conduct is the foundation of our relationship with our suppliers. The purpose of the Supplier Code of Conduct is to outline our expectations according to law and Mitel's core values and beliefs. The Supplier Code of Conduct clearly outlines Mitel's expectation of a safe workplace free of modern slavery and discrimination. While doing business with Mitel, suppliers are expected to abide with these standards and conditions and correct any non-compliances. Non-compliance with the Supplier Code of Conduct may lead to termination of the business relationship.

We endeavour to monitor emerging human rights-related laws, rules, and regulations, as well as international normative standards, good practice, and stakeholder expectations, and we update our policies and practices accordingly.

Memberships

Mitel is a member of Responsible Business Alliance (RBA), the world's largest industry coalition dedicated to responsible business conduct in global supply chains, and we align with and abide by RBA's Code of Conduct. This commitment further reinforces our dedication to ethical business practices and human rights throughout our supply chain.

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Sustainability Rating

In 2023, Mitel used EcoVadis, the globally recognized assessment platform, to rate its business sustainability for a second consecutive year. This evidence-based rating system evaluates over 200 industry categories, 160 countries and companies of all sizes, covering four sustainability themes: environment, labour and human rights, ethics, and sustainable procurement. Mitel scored in the good range, improving its score by eight points between 2022 and 2023. The assessment highlighted Mitel's strong policies on labour and human rights, its comprehensive sustainable procurement policies, and thorough supplier assessments (discussed further below). It also identified areas for improvement which Mitel will address in 2024 to further improve its rating.

Ethics Hotline

Mitel is committed to an environment where open, honest communications are the expectation, not the exception. We strive to have all Mitel employees, customers, partners, and stakeholders feel comfortable approaching Mitel in instances where they believe violations of policies or standards have occurred. Mitel's ethics hotline is available 24 hours a day, seven days a week on a global basis. Parties are encouraged to submit reports relating to violations stated in our Mitel Code of Conduct as well as asking for guidance related to policies and procedure and providing positive suggestions and stories. During 2023, we are not aware of any incidents related to modern slavery concerns in our business activities or supply chains having been raised through our ethics hotline reporting channels.

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SUPPLY CHAIN DUE DILIGENCE PROCESS

Mitel is proactive in addressing the risks associated with having an extensive supply chain network, particularly concerning working conditions and employee standards. In 2023, we implemented several measures to prevent workplace violations in our business network:

a) **Dedicated Monitoring Body:** Taking the complexity involved in supply chain's evaluation into consideration, Mitel formed a dedicated committee in 2022, known as the ESG (Environmental Social and Governance) Steering Committee. The 10-member ESG Steering Committee is a cross-functional body tasked with setting ESG Strategy, monitoring initiatives and policies based upon this strategy, and monitoring and anticipating developments related to Environmental Social and Governance matters. The ESG Steering Committee oversees the social conditions in our supply chain, along with other major sustainability indicators. The ESG Steering Committee holds monthly meetings to review the progress of our sustainability transition and discuss any findings in the supply chain network that are non-sustainable and requires attention.

b) **Mitel S-Plan**: When onboarding key suppliers, Mitel screens for conformance to the Supplier Code of Conduct and modern slavery risks through an assessment called the Mitel S-Plan. The evaluation gauges the supplier's commitment to sustainability and human rights values in their work environment. Identified risks are addressed before further engagement.

c) **Supplier Assessments:** Mitel follows a due diligence process involving risk assessments for existing Mitel suppliers (as well as those acquired through M&A activity). Given our extensive supply chain network, it is impractical to conduct audits and individual verification on an annual basis. Instead, Mitel has made provisions to conduct supplier assessments based on RBA supplier reviews. These surveys and results help in identifying candidates for modern slavery audits for the reporting year.

d) **Annual Review Process Document:** Mitel developed a process document to facilitate the review of supplier's modern slavery audits, recommendations for corrective action plans and evaluation of corrective action implementations.

e) **Contractual Commitments:** Suppliers must agree to comply with the Supplier Code of Conduct as well as applicable laws and regulations when they enter into agreements with Mitel, thereby creating enforceable obligations with Suppliers.

f) **RBA Trainings:** Mitel believes our procurement and supplier facing teams play a crucial role in identifying and eliminating modern slavery in supply network. Mitel utilizes the training programs offered by RBA on modern slavery to create awareness of the issue among our supply chain facing employees. These employees enrolled in relevant online training programs with training in areas such as identifying and preventing forced labour, understanding your counterparty, and responsible sourcing.

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REMEDIATION ACTIONS TAKEN IN 2023

Three Category 1 Suppliers were audited by the third party agency, Joint Alliance for CSR ("JAC"). JAC is an association of telecom operators which is committed to developing, verifying and assessing sustainability practices for manufacturing in the information and communications technology industry. The audit findings did not return any major nonconformity or issues regarding modern slavery, but two issues were raised:

- Workers sometimes choose to exceed the statutory overtime limit set by the country's local legislation. Initial enquiry was conducted by Mitel on this finding and corrective actions were instructed by the auditing agencies to the suppliers.
- One audited site had policies on discrimination which were provided to employees, however, no formal training was provided to assist with understanding the content of the policies. Corrective action was outlined to the supplier and follow up continues to occur.

A fourth contract manufacturer was also audited in 2023 by Sedex, an auditing agency specializing in responsible and ethical sourcing. Sedex conducted a Sedex Members Ethical Trade Audit ("SMETA"). The audit findings did not return any major nonconformity or issues regarding modern slavery.

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ASSESSING MITEL'S EFFECTIVENESS

Modern slavery is a hidden risk – and evaluating our approach and progress is complex. We currently track the following selection of metrics in order to better understand the effectiveness of our approach, and seek to evolve and enhance our monitoring approach over time:

Topic	Key performance indicator
Employees	Percentage of assigned employees in supply management functions completing modern slavery training
	Number of substantiated incidents related to modern slavery concerns raised through our ethics hotline
Suppliers	Number of Mitel suppliers in RBA (by category)
	Number of Mitel suppliers that have agreed to comply with Mitel's Supplier Code of Conduct

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2024 – THE YEAR AHEAD

During 2024 we aim to:

1) Implement a formal modern slavery supplier corrective action process for tracking corrective actions given to Mitel's suppliers and ensuring those actions are implemented and effective;
2) Provide Supplier Code of Conduct to all new suppliers;
3) Delivery of a mandatory vendor questionnaire to Category 1 and Category 2 Suppliers (along with select Category 3 Suppliers) which includes questions around modern slavery;
4) Achieve 100% completion of supplier assessments based on either mandatory vendor questionnaire or through RBA supplier review for all Category 1 Suppliers;
5) Review Category 1 Supplier contracts to determine inclusion of adherence to Supplier Code of Conduct and where practical, to amend contract to include;
6) Create a new, dedicated modern slavery online library – which acts as a centralized hub accessible to all employees to share the latest resources on typologies, red flags and indicators across Mitel;
7) Provide a broader availability to modern slavery training programs to create awareness of the issue among our employees; and
8) Expansion of the metrics used to assess the effectiveness of our actions and the wider communication of same internally and externally.

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APPROVAL AND SIGNING

This Statement has been approved by the Board of Directors of Mitel Networks Limited pursuant to Section 54(1) of the UK *Modern Slavery Act 2015* and the Director of the entity has been specifically authorized by the Board to sign this attestation.

DocuSigned by:
Greg Hiscock
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Name: Gregory Hiscock
Title: Director of Mitel Networks Limited,
EVP, Legal and General Counsel of Mitel
Date: June 27, 2024
I have authority to bind Mitel Networks Limited.