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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's *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 2024 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 2024, we had over 4,000 full-time employees across 30 countries, with a commitment to paying 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 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 outlines 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.
- Corporate Social Responsibility Report: This comprehensive document reflects Mitel's commitment to transparency, sustainability, and positive impact.

We 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

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rights throughout our supply chain. We leverage RBA training materials by making them available to both our employees and our supply chain, as needed.

Sustainability Rating

In 2024, Mitel used EcoVadis, the globally recognized assessment platform, to rate its business sustainability. This evidence-based rating system evaluates over 250 industry categories, 185 countries and companies of all sizes, covering four sustainability themes: environment, labour and human rights, ethics, and sustainable procurement. Mitel scored 60 out of 100 on the 2024 EcoVadis assessment, resulting in Mitel being awarded a Bronze Medal in recognition of our sustainability achievement. 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 2025 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 2024, 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 2024, 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 and is responsible for the creation and maintenance of the Corporate Social Responsibility Report.

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) by leveraging Mitel's procurement team to ensure maximum outreach. 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. In 2024, Mitel reached out to 96 of the top-tier suppliers in Mitel's global supply chain. Mitel received a response rate of approximately 60% (58/96), receiving feedback from Category 1 Suppliers (including all six of Mitel's manufacturing partners), Category 2 Suppliers (including key parts suppliers for plastics, cards, batteries, fasteners, etc.) and Category 3 Suppliers (including key warehousing and logistics suppliers as well as repair partners).

d) **Updates to audit checklist:** Mitel's quality team updated the cross-company audit checklist questionnaire required for initial and continuing assessments of supplier quality, including adding a new section which has social and labour items embedded within;

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

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f) **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.

g) **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 2024

For all suppliers who responded to the Supplier Assessments (as discussed above), Mitel established a scoring methodology for responses based on their significance, with each category requiring a predesignated minimum score. The fifteen suppliers that had scores in a category that fell below the predesignated minimum were notified by Mitel and corrective action guidance was provided, with five being enrolled in training sessions available via Mitel's RBA platform, including training related to the recognition and prevention of forced labour.

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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
	Remediations undertaken

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2025 – THE YEAR AHEAD

During 2025 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) Identify Mitel suppliers that are not capable of taking corrective actions of egregious non-conformities and eliminating them from the supply chain;
3) Provide Supplier Code of Conduct to all new suppliers;
4) Delivery of the supplier assessment questionnaire to Category 1 and Category 2 Suppliers (along with select Category 3 Suppliers) which includes questions around modern slavery;
5) Achieve 100% completion of supplier assessments based on either mandatory supplier questionnaire or through RBA supplier review for all Category 1 Suppliers;
6) Review Category 1 Supplier contracts to determine inclusion of adherence to Supplier Code of Conduct and where practical, to amend contract to include;
7) Expand supplier reach-outs by evolving process with Mitel's procurement team;
8) 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;
9) Continue training sessions for Mitel commodity managers and other supply chain professionals to ensure they continue to be equipped with the tools to identify and prevent modern slavery in the supply chain;
10) Provide a broader availability to modern slavery training programs to create general awareness of the issue among our employees; and
11) 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 and its EVP, Legal and General Counsel has been specifically authorized by the Board to sign this attestation.

DocuSigned by:
Gregory Hiscock
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Name: Gregory Hiscock
Title: Director of Mitel Networks Limited,
EVP, Legal and General Counsel
Date: June 25, 2025
I have authority to bind Mitel Networks Limited.