

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 ("Mitel"; a private company incorporated in the United Kingdom and headquartered in London) on behalf of itself, Mitel and its affiliates 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 2025 and outline our plans for the year ahead.

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 2025, we had over 3,700 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.

In addition, our procurement activities extend beyond our primary supply chain and include indirect and non-production suppliers ("Other Suppliers"). We apply the same expectations regarding ethical conduct and modern slavery compliance across the wider supplier network.

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 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 in 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 by 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 (2025 report to be released in June 2026).

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

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 2025, 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 58 out of 100 on the 2025 EcoVadis assessment, resulting in Mitel being awarded a Commitment Badge 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 2026 to further improve its rating.

Gap Analysis and Regulatory Review

In 2025, Mitel retained an independent sustainability and Environmental, Social and Governance ("ESG") consultant, to conduct a study of supply chain and ESG issues impacting Mitel. The consultant identified several potential enhancements that Mitel could make to strengthen our governance and due-diligence framework, including, but not limited to: evaluating the development of a standalone sustainable procurement policy aligned with ISO 20400, assessing opportunities to reinforce internal oversight through more structured governance and third-party audits, introducing annual supplier attestations to our [Supplier Code of Conduct](#), examining options to integrate sustainability-related disclosures into supplier onboarding, and adopting a risk-based supplier segmentation model with defined expectations for higher-risk suppliers. All proposed enhancements will be further assessed and prioritized prior to any formal implementation.

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 and provide opportunities for anonymous feedback in order to encourage reporting. 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 procedures and providing positive suggestions and stories. During 2025, no incidents related to modern slavery concerns in our business activities or supply chains having been raised through our ethics hotline reporting channels.

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 2025, 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 Steering Committee. The 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 require 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 Evaluations:** Mitel follows a due diligence process involving risk evaluations 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 2025, Mitel reached out to 86 of the top-tier suppliers in Mitel's global network. Mitel received a response rate of approximately 48% (41/86), receiving feedback from Category 1 Suppliers (Mitel's manufacturing partners), Category 2 Suppliers (including key parts suppliers for plastics, cards, batteries, fasteners, etc.), Category 3 Suppliers (including key warehousing and logistics suppliers as well as repair partners) and Other Suppliers (related to IT, insurance, marketing, and HR).
- d) **Updates to audit checklist:** Mitel's quality team monitors and updates (where appropriate) the cross-company audit checklist questionnaire required for initial and continuing assessments of supplier quality, including augmenting sections which have 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.

- 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.

REMEDIATION ACTIONS TAKEN IN 2025

For all suppliers who responded to the Supplier Evaluations (as discussed above), Mitel established a scoring methodology for responses based on their significance, with each category requiring a predesignated minimum score. The twenty 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.

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 Reviewing supplier evaluations according to following matrix: <ul style="list-style-type: none"> • Supplier evaluation execution rate • Average supplier evaluation score • Supplier questionnaire response rate • ISO 14001 certification coverage |

2026 – THE YEAR AHEAD

During 2026 we aim to:

- 1) Continue our efforts in the implementation of 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 eliminate them from the supply chain;
- 3) Provide [Supplier Code of Conduct](#) to all new suppliers as part of onboarding process, with each supplier being required to review, acknowledge and formally accept same;
- 4) Delivery of the supplier evaluation to all suppliers (Category 1, 2 and 3 Suppliers, along with Other Suppliers) which includes questions around modern slavery;
- 5) Complete supplier evaluations based on either mandatory supplier evaluations 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) Improvements to Mitel's S-Plan to incorporate Other Suppliers;
- 8) Expand supplier reach-outs by evolving process with Mitel's procurement team;
- 9) Assess the Gap Analysis and Regulatory Review recommendations and adopt those that support continuous improvement in our modern slavery due diligence practices;
- 10) Continue training sessions for Mitel commodity managers, other supply chain professionals and all Procurement team members to ensure they continue to be equipped with the tools to identify and prevent modern slavery in the supply chain;
- 11) Continue to discuss ways of providing a broader availability to modern slavery training programs to create general awareness of the issue among our employees; and
- 12) Expansion of the metrics used to assess the effectiveness of our actions and the wider communication of same internally and externally.

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.

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Name: Gregory Hiscock

Title: Director of Mitel Networks Limited,
EVP, Legal and General Counsel

Date: June 5, 2026

I have authority to bind Mitel Networks Limited.