



## Avaya Conflict Minerals Policy

“Conflict Minerals” refers to specific minerals mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where the revenues from these minerals may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses.

In July 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) was signed into law in the United States. As adopted, the Dodd-Frank Act required the U.S. Securities and Exchange Commission (“SEC”) to promulgate regulations requiring publicly traded companies to disclose their use of Conflict Minerals and its origins, and if from covered regions, disclose whether or not the minerals are “conflict-free.” The specific minerals addressed by the Dodd-Frank Act are Cassiterite, Columbite-Tantalite, Wolframite, Gold and derivatives of these minerals. In August 2012, the SEC adopted the necessary regulations that among other things, require publicly traded companies to conduct due diligence on their supply chain and to disclose information regarding Conflict Mineral usage, if any.

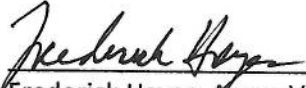
Avaya fully supports the intent of this legislation to eliminate the social and environmental harm brought about by the use of Conflict Minerals and any funding that supports armed groups in the DRC region. In addition, Avaya has supported the Organisation for Economic Cooperation and Development due diligence approach to addressing social responsibility issues and has adopted this framework for our due diligence program to determine the presence or extent of these minerals in our products. Avaya fully intends to comply with its reporting obligations as set forth by the SEC.

As a result, Avaya expects the following from its direct material suppliers:

- To source minerals from non-conflict regions or, if sourced from conflict regions, to identify whether the sourcing is conflict-free (i.e. not used to fund conflicts in Covered Countries) through a reasonable due diligence program.
- To disclose to Avaya via the RBA-GeSI reporting survey template the requested information necessary for Avaya to accurately report to the SEC as required.
- To pass these requirements down to lower levels in their supply chain using reasonable efforts to determine the source of the specified minerals, if they do not source directly from smelters.

Where Avaya finds that a direct material supplier has not complied with these expectations, the direct material supplier will be required to promptly take all steps necessary to correct the non-compliance, including, without limitation, the development, submission and implementation of their corrective action plan.

Avaya’s Conflict Mineral Policy and subsequent updates will be communicated to our supply chain partners and stakeholders via our website and referenced in all new RFPs, contracts and contract revisions. Compliance with this Policy will be a requirement for all direct material supplier contracts.

  
Frederick Hayes, Avaya VP – Chief Supply Chain Officer

9/9/2018  
Date