



Title: Global Equal Opportunity Non-Discrimination Policy	
Policy Family: Compliance	
Version Number: 20.0	Last updated: Oct 2018
Policy Document Owner: Stacey Piña	

This policy document is applicable to all Avaya Inc. business units. This document is proprietary to Avaya. The company reserves the right to alter this policy at any point in time without prior notice.

1. OBJECTIVE

To reaffirm Avaya's commitment to provide equal opportunity to all employees and applicants for employment in accordance with all applicable laws, directives, and regulations of federal, state, and local governing bodies and agencies.

2. APPLICABILITY

This policy is applicable to all global Avaya employees and work sites.

3. POLICY

Avaya is an equal opportunity employer and cultivates the richness of cultures, perspectives, experiences and skills that make up our culture of unity and global community. Diversity, and the equal opportunity it affords, is a fundamental part of our Avaya values. It also makes Avaya more competitive in the marketplace.

It is Avaya's global corporate policy to treat each individual with dignity and respect by:

- Complying with both the letter and the spirit of all applicable laws and regulations governing employment;
- Taking all necessary steps to provide equal opportunity to all qualified employees and applicants in all aspects of employment;
- Prohibiting unlawful harassment, discrimination or retaliation in any employment decision or in the administration of any policy on the basis of known or perceived race, ethnicity, color, creed, religion, national origin, citizenship, sex, marital status, family responsibilities, age, genetic information, physical or mental disability or handicap, one's status as a "disabled veteran"¹¹, "recently separated veteran", "armed forces



service medal veteran” or “active duty wartime or campaign badge veteran”; pregnancy, childbirth, and related medical conditions or because of a person’s sexual orientation, gender identity, characteristics, or expression, or any other protected characteristics as defined under applicable law;

- Making reasonable accommodations based on the verified physical and/or mental conditions of qualified employees or applicants with disabilities or handicap and/or to reasonably accommodate the sincerely held religious beliefs and affiliations of qualified employees or applicants;
- Prohibiting unlawful discrimination, bullying, mobbing, victimization or harassment, including because of one’s association with an individual or a representative of a group having any of the protected characteristics described above;
- Ensuring that maximum opportunity is afforded to all minority- and woman-owned businesses to participate as suppliers, contractors, and subcontractors of goods and services to Avaya, in a manner consistent with applicable law; and complying with regulatory agency requirements and with federal, state, and local procurement regulations and programs; and
- Advising employees of their right to report violations of this policy to management, Human Resources, or to the Avaya [Equal Opportunity Compliance](#) team without intimidation or retaliation of any kind as a result of exercising such rights.

PAY TRANSPARENCY NONDISCRIMINATION PROVISION:

Avaya is a U.S. government contractor and will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Avaya’s legal duty to furnish information.

No individual will be subjected to unlawful bullying, harassment, mobbing, victimization, intimidation, threats, retaliation, coercion or discrimination for requesting a reasonable accommodation, reporting an allegation in good faith, assisting or participating in an investigation, compliance review, hearing, or any other enforcement proceeding, or opposing any act made illegal by federal, state, or local equal opportunity law. Avaya cooperates with government officials in conducting investigations and other activities related to the administration of applicable federal, state and local legislation.



Each year, we reaffirm Avaya's commitment to provide equal opportunity to all employees and applicants for employment in accordance with all applicable laws, directives, and regulations of federal, state, and local governing bodies and agencies. All employees are responsible for supporting Avaya's equal opportunity policies. All management level employees are required to become familiar with the provisions of this policy and to be able to discuss this material with their employees.

We require all Avaya employees to comply fully with all aspects of this policy, to conduct themselves in accordance with the principles of equal opportunity, and report any suspected violations to the [Avaya Compliance Hotline](#) at 1-877- 993-8442 (US) or 908-953-7276 (outside the US), eocontact@avaya.com, Human Resources or a member of the management team.

Demonstrated commitment to equal opportunity is an investment in our people and our future growth as an organization. Avaya's ongoing efforts in this direction have provided and will continue to provide us with a critical competitive advantage in the marketplace.

James Chirico
President & Chief Executive Officer
October 2018

Faye Tylee
VP, Human Resources

4. REFERENCES

Avaya is an Equal Opportunity Employer. Our commitment to equality is a core value of Avaya. All qualified applicants and employees are entitled to receive equal treatment without consideration for race, religion, sex, national origin, disability status or any other protected characteristic. For more information and support, contact Avaya's Equal Opportunity hotline by phone at 908-953-7488 (US) or at <https://app.convercent.com/en-us/Anonymous/IssueIntake/IdentifyOrganization>.

[1] Avaya is a U.S. VEVRAA Federal Contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veteran's Readjustment Assistance Act of 1974 (Section 4212), as amended and Section 503 of the Rehabilitation Act of 1973, as amended (Section 503). Accordingly, Avaya is committed to taking positive steps to implement the employment-related aspects of the global Equal Opportunity policy in the United States



AVAYA INC. ("AVAYA") HAS THE RIGHT TO AMEND, CHANGE, OR CANCEL ANY POLICY SOLELY AT ITS DISCRETION AND WITHOUT PRIOR NOTICE, UNLESS OTHERWISE PROVIDED FOR IN YOUR EMPLOYMENT AGREEMENT OR GOVERNING LAW. NOTHING PUBLISHED IN THIS HR POLICY PORTAL OR DISTRIBUTED BY AVAYA IS AN EXPRESS OR IMPLIED CONTRACT FOR CONTINUED EMPLOYMENT OR EMPLOYMENT OF A SPECIFIC LENGTH OF TIME. AVAYA EMPLOYEES ARE EMPLOYEES-AT-WILL; MEANING AVAYA EMPLOYEES MAY TERMINATE THEIR EMPLOYMENT AT ANY TIME AND FOR ANY REASON. THAT ALSO MEANS THAT AVAYA CAN TERMINATE ITS EMPLOYEES' EMPLOYMENT AT ANY TIME AND FOR ANY REASON. EMPLOYEES OF AVAYA'S SUBSIDIARIES IN NON-US JURISDICTIONS SHOULD REFER TO ANY APPLICABLE LAWS AND LABOR AGREEMENTS.