



AVAYA

Code of Conduct 2025

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FOUNDATION OF OUR CODE



CEO Message

Every day, the world's major brands and essential government organizations count on Avaya to help them build stronger connections and drive real business value. That trust isn't handed to us lightly. It's earned, one decision at a time, through our integrity and commitment to each other, and most importantly, to our customers. For us, integrity isn't just a talking point; it's the bedrock of the relationships we build and the reputation we've fought to establish.

Integrity is also the primary cornerstone of the Avaya Code of Conduct, which guides how we work, how we lead change, and how we hold ourselves accountable. It's our non-negotiable framework for doing business the right way: ethically, responsibly, and in line with the law.

As we pursue ambitious goals, and support our customers in doing the same, our Code of Conduct is our single source of truth. It's how we ensure we're making the right calls and, critically, how we know when it's time to reach out for guidance or ask for help.

I trust that each of us follows these standards and holds ourselves to the highest ethical standards each and every day, so we can continue to earn the trust of our customers, partners, and each other.

Patrick Dennis

Patrick Dennis
Chief Executive Officer, Avaya

Our Vision and Mission

Vision

Accelerate the customer path from contact to connection.

Mission

To help the world's largest organizations and government agencies forge unbreakable customer connections.

About Avaya

Avaya is a global enterprise software leader that helps the world's largest organizations and government agencies forge unbreakable customer connections. The Avaya Infinity™ platform is built to unify fragmented experiences, equipping enterprises to evolve their contact centers into connection centers and strengthen relationships that create business value.

Ethical Decision-Making

We make thousands of decisions every day and generally we know the difference between right and wrong, but it may not always be that simple. We may be presented with an action where the “right thing to do” may not be as clear. Conflicting priorities, such as choosing between personal gains versus the right decision for the company, may be a challenge to our judgement. Consider asking yourself these questions when faced with a difficult decision:

Policies

Does the action align with Avaya’s Code, policies and procedures?

Laws

Is the action legal?

Ethics

- Is the action ethical and socially responsible?
- Would my family, friends and community approve?

Community Standards

- Is the action in the best interest of our employees and customers?
- Would the action withstand public scrutiny?

Our Code. Our Responsibilities.

Complying with the Code and, by extension, Avaya policies, furthers our commitment to conduct business ethically and ensures that each of us, as well as Avaya, complies with applicable laws and regulations. Violations of the Code, any Avaya policy or applicable law will be subject to discipline, up to and including dismissal. Certain violations of the law may also include fines, prosecution and prison sentences.

Responsibilities:

- Read and understand the Code.
- Comply with the Code, including with all Avaya policies, to ensure ethical conduct that also complies with local laws.
- Report misconduct and raise issues or concerns without fear of retaliation through any of the available channels described below.
- Cooperate fully with any investigations with respect to allegations or concerns.
- Ask questions if you are unsure about any aspect of the Code or Avaya policies.

Responsibilities for Managers:

We are each responsible for exhibiting ethical behavior and establishing a culture where concerns and questions can be raised and discussed by doing the following:

- Be a role model for ethical behavior.
- Recognize ethical behavior.
- Do not allow retaliation.
- Listen to employees when issues are raised and engage the appropriate support as needed.
- Establish a culture where concerns can be raised and discussed.

Who Should Follow the Code?

The Code applies to all individuals who work for or represent Avaya, including:

Employees	Officers	Directors	Subsidiaries	Contractors
Third Parties <ul style="list-style-type: none"> • Business Partners • Distributors • Suppliers • Sales Agents • Consultants 		All third parties are expected to abide by the guidelines within the Code, the terms of their agreements with Avaya and each of Avaya’s Channel Partner Code of Conduct and Supplier Code of Conduct, as applicable.		

BUILDING TRUST WITH EACH OTHER

Speaking up/Non-retaliation Policy

We understand that coming forward to report misconduct may not be easy. While we recognize that, we expect and empower you to do so. No issue is too small. If you feel something is being done in a manner that is unethical or in violation of the Code, Avaya policies, or applicable laws, it is your responsibility to report. Avaya will not retaliate against anyone who makes a report in good faith. Employees can submit reports utilizing one of several channels:

Direct manager	Leadership	Human Resources	Legal team	Ethics and Integrity Team	Avaya’s confidential helpline
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Reports can be made anonymously using Avaya’s confidential helpline which can be accessed through the following means:

- In the U.S.: 1-877-99-ETHIC (1-877-993-8442)
- Outside the U.S.: +1-908-953-7276
- Via the **Avaya Ethics Helpline**

Employees are encouraged, but not required, to submit reports to their managers in the first instance. If you feel that your concern has not been addressed, please reach out to the **Ethics and Integrity Team**.

What is Retaliation?

Retaliation can take many forms, some subtle and some more direct. Any of the following actions taken as “punishment” for speaking up or participating in an investigation could be instances of retaliation: threatening, bullying or belittling, suspension, demotion or termination, denial of benefits, denial of raise or bonus, negative performance reviews (when not warranted), or removal from any key accounts or projects.

Non-retaliation

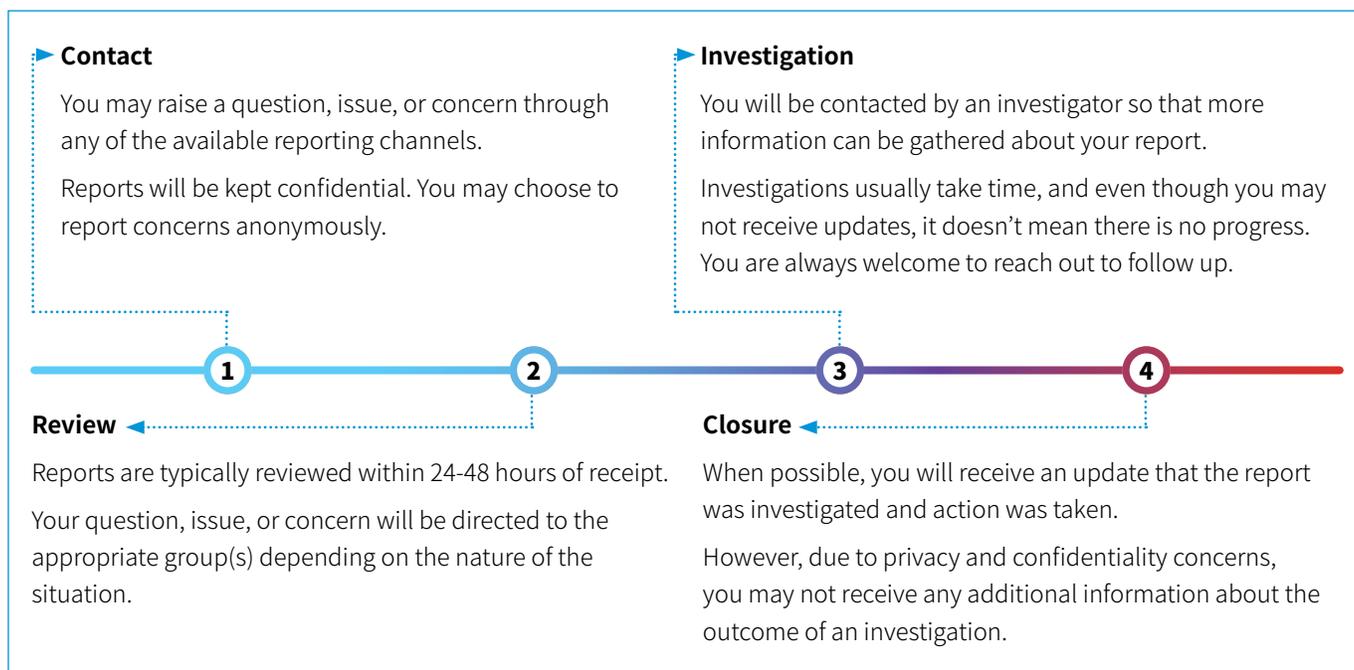
Avaya has a zero-tolerance policy when it comes to retaliation in relation to anyone who brings forth a concern in good faith, even if it later turns out to be unsubstantiated. If you believe you have been retaliated against, reach out to the [Ethics and Integrity Team](#). Anyone who has been found to have retaliated against someone who raises a concern will be subject to appropriate discipline, up to and including termination.

Investigation Process

What Happens After I Make a Report?

No matter who you contact or which resource you use to report a concern, rest assured that it will be promptly reviewed and investigated in accordance with our policies and investigation taxonomy. You will have the option to provide your name and contact information, or you can choose to remain anonymous, where permitted by law. During the investigation process, we listen for understanding and assume positive intentions.

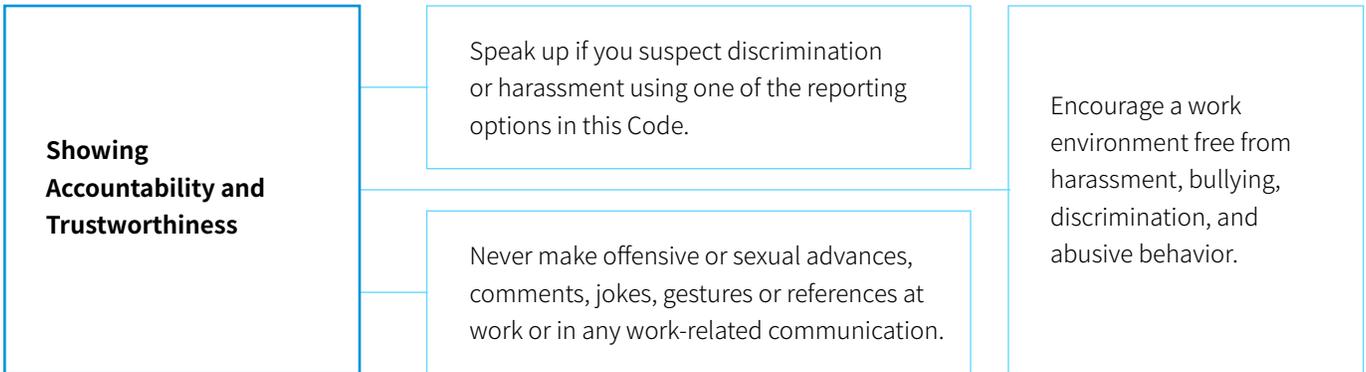
You are required to fully cooperate with investigations and truthfully comply with all requests for information, interviews or documents. Anyone who fails to cooperate with the investigation will be subject to appropriate discipline.



All reports are taken seriously and investigated. We seek to maintain confidentiality during the course of any investigation where allowed by law. To respect the individuals involved in any investigation and to further maintain confidentiality, information regarding investigation status, findings and results are not shared with reporters.

Preventing Harassment

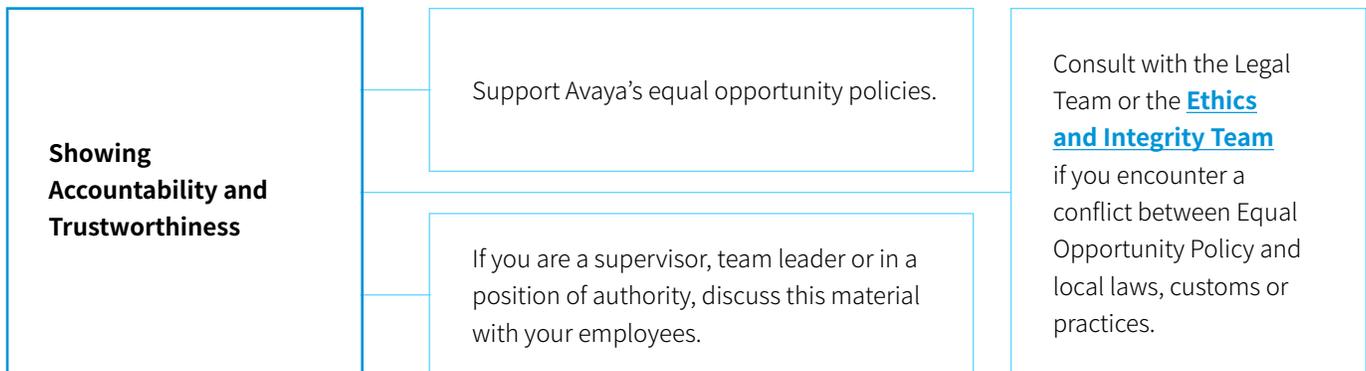
Harassment is any verbal, written or physical act, gesture, or object that is directed or used in such a manner as to affect or impede an employee’s professional performance, or to create a hostile or offensive work environment. Harassment singles out an employee because of the employee’s race, color, sex, sexual orientation, gender identity or expression, religion, national origin, medical condition, ancestry, ethnicity, citizenship, age, marital, civil union or domestic partnership status, physical or mental disability, genetic information, past or present military status or protected veteran status or any other status protected by the laws or regulations in the locations where we operate.



 **Additional Policies and Resources**
[Global Harassment Prevention Policy](#)

Inclusion by Design

At Avaya, inclusion is not an initiative—it’s how we work. We embed inclusive thinking into every process, decision, and interaction, recognising that the richness of cultures, perspectives, experiences, and skills across our global community is our greatest strength. We champion equity and belonging by empowering every individual to lead from where they are, valuing lived experience as a driver of innovation and impact. As an equal opportunity employer, we are committed to creating an environment where everyone can thrive and contribute to shaping a more connected, inclusive future.



Q: A team member was overheard telling a joke about their own family. It was offensive. What should you do?

A: Inappropriate comments, even when someone makes them about themselves, are inconsistent with Avaya’s values and are not acceptable. You are encouraged to bring this to the attention of Human Resources or management or make a report to Avaya’s confidential helpline.

Q: You were uncomfortable with a comment made at your last staff meeting, but you didn’t want to talk to anyone and get labeled as a troublemaker. What should you do?

A: You can contact Avaya’s anonymous confidential helpline. All reports made in good faith are investigated.



Additional Policies and Resources
[Human Resources Policy Guide](#)

BUILDING STRONG RELATIONSHIPS

Gifts and Entertainment

Our Policy

As a general rule you can accept a meal, gift or entertainment from nongovernment customers, suppliers or business partners if it is unsolicited, inexpensive and not given to influence business decisions.

Similarly, employees may provide reasonable meals, gifts or entertainment to nongovernment customers, suppliers or business partners provided that it is related to proper business purposes, is not offered to influence a business decision, and is permitted under applicable laws and Avaya’s Travel and Entertainment policy.



Gifts are often exchanged as a part of business relationships. Often these consist of Avaya branded items or other non-lavish items consistent with local norms.

The graphic below provides guidance for necessary approvals for gifts and entertainment:

Non-Lavish Gifts (less than \$100 USD) and/or Entertainment (less than \$250 USD)

Written approval from your direct manager



Lavish Gifts (more than \$100 USD) and/or Entertainment (more than \$250 USD)

Written approval from (i) your direct manager and (ii) the [Ethics and Integrity Team](#)

(Convert USD to local currency)

Please note the following guidelines apply to all gifts, entertainment or other advantages:

- Cash or cash equivalents are not acceptable forms of gifts in any circumstance.
- Gifts should not be lavish.
- Permissible gifts must be given with complete transparency and accurately reflected in Avaya's books and records through appropriate receipts and documentation.
- Gifts, meals and entertainment for officials and employees of governments (including government owned entities), in every country around the world, are highly regulated and often prohibited and must be reviewed in advance by the [Ethics and Integrity Team](#).
- All travel for customers, partners, press or suppliers must be in accordance with Avaya's Travel and Expense policy and reviewed in advance by the [Ethics and Integrity Team](#).

Showing Accountability and Trustworthiness

Do not provide or accept gifts, entertainment or other favors of the type or amount that go beyond common courtesies consistent with ethical and accepted business practices.

Do not use third parties such as partners, suppliers or family members to provide gifts, entertainment or favors.

Gift Receiving

- You can accept a gift, meal, entertainment or other favor from nongovernmental customers, partners or suppliers, provided it is unsolicited, reasonable and not given to influence your judgment. In other circumstances, you should decline and explain Avaya's policy.
- Before accepting a gift, an invitation for a meal or entertainment, or other favors that seem lavish or excessive, consult your supervisor or email the [Ethics and Integrity Team](#).

Gift Giving

Employees may provide reasonable gifts, entertainment, meals or favors to nongovernmental customers, partners, or suppliers provided that:

- You are not asked to provide it.
- It is not being offered to influence the recipient's business decision.
- It is permitted under applicable laws, regulations, rules, and consistent with ethical and accepted business practices.
- It is consistent with Avaya's policy.

Recognition Gifts

Supervisors and employees must consult Human Resources before presenting any gift or other form of recognition to Avaya employees to ensure compliance with Avaya's recognition policy.

Knowledge Tip

- Consult with your supervisor and the [Ethics and Integrity Team](#) regarding the following:

Golf outings

**Tickets to events such as concerts,
sporting events or theater shows**

Trips to resorts

Gifts for you and your family

Q: What is the difference between a gift and business entertainment?

A: Business entertainment can entail dinners, sporting events, trade shows or other customer events at which representatives of both parties are generally in attendance and business is typically discussed. A gift is something given or received, such as tickets for an event at which representatives of the organization extending the gift are not in attendance.

Q: A customer asks me to obtain four tickets to a large sporting event and hints that this will close the sale more quickly. Can I buy the tickets?

A: This potential scenario raises a number of concerns. First, a gift cannot be solicited. Second, four tickets to an event is considered lavish. Third, the facts do not suggest that a business conversation or product demonstration would be taking place.

Q: A supplier invites me to a sporting event that it is hosting with other customers, offering an opportunity to meet its leadership and discuss business relationships. Can I go to the game?

A: You need to obtain approvals in writing based on the Gifts and Entertainment approval matrix and its thresholds prior to attending.



Additional Policies and Resources

[Gifts and Entertainment Policy](#) | [Travel and Expense Policy](#) | [Gifts and Entertainment Disclosure Form](#)

Conflicts of Interest

Remember: Make decisions in the best interest of Avaya. Avoid conflicts of interest or even the appearance of a conflict.

Our Policy

Avoid situations in which your personal interests might conflict, or appear to conflict, with the interests of Avaya.

Conflicts of interest may arise when your financial or other outside interests produce conflicting loyalties, interfere with your job performance, or are potentially adverse to the interests of Avaya.

Showing Accountability and Trustworthiness

You should avoid even the appearance of a potential conflict of interest.

Prior to hiring, promoting or directly supervising a family member, close friend or someone with whom you are in a relationship, you must obtain the approval of your manager, Human Resources and Legal.

Potential conflicts can easily be avoided or addressed if they are promptly disclosed and managed accordingly. Employees are encouraged to use the Conflicts of Interest questionnaire for the Ethics and Integrity Team to review the potential conflict.

Situations where conflicts may arise:

- Outside activities: Work that interferes with your work at Avaya
- Membership on outside Board of Directors of companies or organizations we do business with
- Financial Interest of third parties with whom we do business
- Hiring / doing business with family members
- Personal relationships
- Business opportunities

Q: A product manager would like to make an investment that would make him a controlling stockholder in a competitor of Avaya. Is this a conflict of interest?

A: Yes, the proposed investment would make him the owner of a business that competes with Avaya.

Q: Your spouse has accepted a position at a business partner that Avaya does business with. Do you need to report this?

A: Yes, most conflicts of interest can be eliminated by disclosing them and making sure steps are taken to prevent your interests from conflicting with Avaya's.



Additional Policies and Resources

[Conflicts of Interest Policy](#) | [Conflicts of Interest Disclosure Form](#)

[Guidelines for Membership on Outside Board of Directors](#)

Anti-Bribery / Anti-Corruption

Remember: Do not offer bribes, accept bribes or let others offer or accept bribes for you. Do not make any kind of facilitation payments.

Our Policy

Avaya prohibits giving or offering of anything of value to anyone to improperly:

Influence any decision that impacts Avaya

Obtain or retain business for Avaya

Secure any business advantage for Avaya

Avaya also prohibits facilitation or grease payments, which are payments made directly to government officials designed to speed up routine government processes or activities. Generally, facilitation payments are made in cash and to a person. Please note that expediting fees that are published and universally available are not deemed facilitation payments and are acceptable.

Avaya also prohibits commercial bribery, which violates the laws of many countries (e.g., UK Bribery Act, US Foreign Corrupt Practices Act). Any bribe or improper payment to current or prospective customers, including, but not limited to, government officials, or suppliers could subject you to consequences beyond disciplinary action by Avaya, such as prosecution.

Prevent bribery by others who conduct business on our behalf by complying with the processes established to ensure that we know the third parties with whom we are engaging in business, understanding the scope of each transaction and ensuring discounts are passed down to the appropriate end customer.

Showing Accountability and Trustworthiness

- Never give anything of value to influence a decision or obtain improper business.
- Follow the corporate gift giving guidelines.
- Do not donate Avaya funds to political entities.
- Notify the [Ethics and Integrity Team](#) if you are being directed to use a specific consultant by a government employee, business partner, or supplier.
- Follow company guidelines for engaging partners, suppliers, and consultants.

Q: The Finance department manager needs to take an international business trip on short notice to conduct business in person; however, she needs a visa to do so. The manager's assistant learns that the process of obtaining a visa takes longer than she'd anticipated, and now she's looking for a way to expedite the process. What should she do?

A: In many cases, the office, agency, or department you are working with will offer an expedited service at a set and published fee schedule. Payment of this fee may be allowed under our policy. However, if you are asked to make a facilitation payment, seek guidance from the legal department. Facilitation payments are illegal under numerous international anti-corruption laws and prohibited under Avaya policy.



Additional Policies and Resources
[Anti-Bribery/Anti-Corruption Policy](#)

Antitrust/Competition

Remember: We abide by the law and are committed to doing business fairly with our partners, suppliers, and competitors.

Our Policy

We compete aggressively for business while maintaining high ethical standards. We comply with the Code, our Avaya policies and applicable laws, regardless of how competitive the environment is.

We do not engage in anti-competitive practices such as price fixing, bid rigging, or dividing of territories.

We do not obtain competitive information through improper means such as deception, the misuse of a business relationship, or from nonpublic sources such as former colleagues that work at competitors.

Showing Accountability and Trustworthiness

- When you interact with customers, provide only truthful information about the quality, features and availability of our products and services, and don't make disparaging remarks about our competitors.
- Compete vigorously but deal fairly with our customers, business partners, suppliers, and competitors.
- Do not talk about our business strategies and plans with competitors and vice versa.
- Never enter into any agreement or understanding, whether formal or informal, with a competitor, customer or supplier to:
 - Raise, set or hold or otherwise fix prices on our products
 - Divide territories, markets or customers
 - Prevent another company from entering the market
 - Refuse to deal with a customer or supplier
 - Interfere with the competitive bidding process
 - Agree to discounts inconsistent with established policies
 - Discuss customer relations with competitors
- Avoid contact with competitors that could create the appearance of impropriety, such as when attending trade shows or industry events.
- Obtain and share information ethically.
- Seek competitive information from public sources.
- Be fair, factual and complete in our advertising, sales and promotional materials.

It is acceptable to maintain relationships with employees that work at competitors but important that these relationships are not used to obtain proprietary information.

Q: A colleague who formerly worked at a competitor offers to provide the price lists from the competitor that were taken just before the colleague resigned. What do you do?

A: You cannot use this information and you should contact the [Ethics and Integrity Team](#).

Q: You are at a trade show and a competitor approaches you about dividing up territories and contract bids, so you can both more easily hit your quota. How do you respond?

A: You need to immediately end the conversation and contact the [Ethics and Integrity Team](#). This person has engaged in anti-competitive behavior that can result in steep fines.



Additional Policies and Resources

[Antitrust/Competition Compliance Policy](#) | [Competitive Information and Comparative Claims](#)

Data Privacy

Our Policy

How we handle the personal data entrusted to us by our customers, partners, suppliers and colleagues is critical to our success. It is our policy to only gather information we need and to be transparent regarding the reasons for gathering such information and our intended uses.

We only keep personal data if legally required and we respect the right of the individual to know what information we have, what we do with it, and when legally allowed, we will honor their right to be forgotten.

Showing Accountability and Trustworthiness

Familiarize yourself with our privacy policies.

Familiarize yourself with our data classification and data retention policies and be careful to follow the policy, retaining only the personal data required to be maintained.

Be aware of the proper methods for handling and securing personal information.

If unsure, seek guidance from the [Data Privacy Team](#).



Additional Policies and Resources

[Global Data Privacy Policy](#)

Third Party and Business Partners

Remember: Make decisions in the best interest of Avaya. Avoid conflicts of interest or even the appearance of a conflict.

Our Policy

At Avaya, we do business with organizations that meet or exceed our ethical standards. We select the third parties with whom we transact business carefully and ensure they meet our requirements, abide by applicable law, follow the principles of the Code and Avaya policies. A third party's conduct and reputation for service and integrity should reflect positively on our company. We select suppliers objectively based on merit, not on reciprocity or quid pro quo arrangements.

We perform due diligence on third parties with whom we seek to transact to ensure they act ethically and handle information in a manner that would be acceptable under Avaya policies. Suppliers and business partners must abide by the guidelines within the Code, terms of their agreements, and each of Avaya's Channel Partner Code of Conduct and Supplier Code of Conduct, as applicable.

Showing Accountability and Trustworthiness

Avaya employees working with third parties such as suppliers, consultants, agents, sales representatives, business partners, distributors and independent contractors must:

Follow all on-boarding procedures for suppliers and business partners.

Monitor your suppliers and partners to ensure they are meeting their commitments and acting ethically.

Engage the appropriate resources if you identify performance issues with your partner or supplier.



Additional Policies and Resources

[Supplier Code of Conduct](#) | [Avaya Channel Partner Code of Conduct](#) | [Avaya Vendors Security Review](#)

Working with the Government

Our Policy

Activities that might be appropriate when working with private sector customers may be improper or even illegal when dealing with government customers. Those who work with government customers, be they local, state, federal or state-owned/controlled, in any country, or who otherwise interact with government employees, are expected to follow all procurement, gifts and entertainment, anti-bribery, anti-corruption and other applicable laws and requirements. Failure to comply with these requirements may result in severe penalties, including potential civil and criminal fines, imprisonment and Avaya's debarment from doing business with the government.

Showing Accountability and Trustworthiness

Except in very limited circumstances and as otherwise permitted by law or regulation, you are prohibited from providing or paying any gratuity or anything of value, including meals, refreshments, entertainment, travel and lodging expenses, directly or indirectly to or for the benefit of a government employee or representative. Consult a member of the Legal Team for specific guidance when dealing with any government.



Additional Policies and Resources

[Global Trade Compliance Policy](#) | [Anti-Bribery/Anti-Corruption Policy](#)

PROTECTING THE COMPANY

Financial Reporting

Our Policy

Integrity in our recordkeeping inspires trust by our customers, partners, suppliers, colleagues, investors and other stakeholders.

We prepare timely, accurate and complete financial information for use in reports to management, investors, regulators and other stakeholders.

Showing Accountability and Trustworthiness

Each of us has an obligation to follow all internal controls in recording and maintaining our company books and records.

- Maintain effective processes and internal controls that fairly reflect transactions or events in a timely manner, as well as prevent or detect inappropriate transactions.
- Follow the appropriate Schedule of Authorizations and obtain all necessary approvals for business transactions and expenses.
- Be honest, accurate and complete when preparing any business documents.
- Never sign or enter into side agreements that are not on standard paper or have not been approved by Legal and Contracting.
- Never engage in inappropriate transactions that misrepresent the reporting of other parties, such as customers or suppliers.
- Never engage in tax evasion or facilitate anyone else in engaging in tax evasion.
- Take the time to review and verify that documents you approve are factual and accurate.
- Know your customers and partners and understand their use of our products and data to prevent illegal activity.
- Watch for and report signs of potential fraud, bribery, tax evasion or money laundering activity.
- Observe both the form and spirit of technical accounting and ethical standards.
- Seek the advice of your controllership team if you become aware of a questionable transaction.
- If you identify transactions that are questionable immediately notify your manager, controller or the [Ethics and Integrity Team](#).
- Accurately, complete quarterly representation letters or other required representations when asked.

Q: At the end of the quarter your supervisor mentions that he asked a business partner to place an order early to meet his target and verbally committed to take the product back if the deal did not materialize with the end customer. How should you respond to this?

A: You should contact the [Ethics and Integrity Team](#) and report the deviation in your quarterly representation letter.



Additional Policies and Resources

[Accounting Policies](#) | [Schedule of Authorizations](#)

Intellectual Property

Remember: We aggressively defend and protect our intellectual property and respect the intellectual property of others.

Our Policy

Intellectual property includes but is not limited to:

Patents	Trade Secrets	Trademarks	Service Marks	Copyrights
Graphics, Logos, and Slogans	Trade Names	Domain Names	Know-how, Source Code and Developed Technology	

Proprietary information includes but is not limited to:

Business Plans	Customer Lists	Internal Documents	Organization Charts
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When you help protect these assets, you help protect our competitive advantage.

Use Avaya's trademarks and service marks only in accordance with Avaya Standards and Guidelines which are available to employees and partners on the Sales and Partner Portal.

If suppliers want to use Avaya's name or other intellectual property certain restrictions will apply, and certain documents need to be executed by Avaya's Global Sourcing Organization.

If a partner wants to use Avaya's name or other intellectual property similar restrictions apply and are available on the Sales and Partner Portal and reflected in the reseller agreement.

If you have any ideas for patents they should be submitted on the Avaya Invention Disclosure Form.

For any direct questions regarding Avaya's intellectual property they can be directed to the [Ethics and Integrity Team](#).

Showing Accountability and Trustworthiness

All Avaya employees, contractors and agents have a responsibility to:

- Identify, protect, and defend Avaya's intellectual property.
- Promptly identify and report unauthorized disclosure or violations of infringements by any third party.
- Respect the intellectual property of others.
- Abide by terms of use and End User Licensing Agreements when using third party software or materials.
- Classify, label, store and limit access to proprietary information in accordance with Avaya Security policies.
- Know that anything you create within the scope of your employment with Avaya may be considered Avaya intellectual property.



Additional Policies and Resources

[Intellectual Property Law & Management](#) | [Avaya's Third-Party Software Policy](#) | [Avaya Brand Guidelines](#)
[Global Sourcing Organization](#) | [Avaya Security Policies](#) | [Avaya Invention Disclosure Form](#)

Confidential and Proprietary Information

Remember: Our proprietary information is a competitive advantage and must be properly protected to maintain our position in the market and trust of our customers and partners.

Our Policy

- We do not use or disclose material, nonpublic information about Avaya or any other company without establishing a valid need to know and ensuring the proper nondisclosure protections are in place.
- We protect confidential and proprietary information in our possession, whether it relates to Avaya or another party.
- We respect other parties' rights to proprietary information, including intellectual property, personally identifiable information, and personal health information.

Showing Accountability and Trustworthiness

- When necessary, ensure that a non-disclosure agreement is in place and do not disclose Avaya's confidential or proprietary information even after your employment with Avaya ceases.
- Understand and comply with the terms of any non-disclosure agreements.
- Consult Avaya Security policies to understand how to properly mark and handle proprietary information.
- Handle customer information in accordance with Avaya Security policies and customer agreements.
- Handle personal health information in accordance with Avaya policy.



Additional Policies and Resources

[Avaya's NDA Process](#) | [HIPAA Policies](#)

[Avaya's Security Policy](#) (Data classification guidelines, Protection of Information Assets)

Insider Trading

Our Policy

As you conduct business on behalf of Avaya, you may come across material, nonpublic information about Avaya or about third parties (such as customers, partners, suppliers or strategic partners) maintained by Avaya.

Nonpublic information is considered material if a reasonable investor would likely consider it in their decision to buy or sell a security.

Material, nonpublic information is considered insider information and transacting in securities based on such information is illegal. It is also illegal to provide insider information to others, such as friends, family or colleagues, so they can use it to make trading decisions. If you have questions about insider trading, please contact the [Ethics and Integrity Team](#).

Showing Accountability and Trustworthiness

Do not trade securities while in possession of material, nonpublic information about any company you interact with, including but not limited to Avaya, its customers, partners, suppliers, or other strategic partnerships.

Comply with any applicable trading blackout periods. Comply with Avaya's Insider Trading Policy. If you are not sure the information you have is considered insider information or if a blackout period is applicable to you, contact the [Ethics and Integrity Team](#).



Additional Policies and Resources
[Insider Trading Policy](#)

Cybersecurity

Our Policy

We each play a role in securing Avaya's proprietary information as well as confidential information entrusted to us by our customers.

Avaya maintains security systems and processes to protect confidential data. Cyber threats constantly evolve to avoid detection by these systems. Attackers seek to lure unsuspecting individuals with authorized access into providing the information they seek or gain unauthorized access to Avaya's network and systems.

Data breaches and data loss can result in financial and reputational damage to the company. In the event of a breach, we will be held accountable for compliance with our security practices and our response.

Showing Accountability and Trustworthiness

Attacks come in many different forms. Always keep your guard especially in the following situations:

When asked for your username or password by anyone other than Avaya IT.

Do not click on links in an email from an unknown sender.

Requests to change banking information in Avaya's systems or process invoices outside of process.

If you receive an email or text message from a leader you normally don't interact with, asking you to do something outside of process.

Requests for information on projects you are working, organization charts, or other sensitive data.

Promptly report breaches to cybersoc@avaya.com or suspected breaches as outlined in the Data Breach Response guideline. Responding quickly and appropriately protects Avaya and our customers.



Additional Policies and Resources
[Data Breach Response](#) | [Avaya Security Standards](#)

Acceptable Use Policy

Our Policy

- Unless otherwise prohibited by law, Avaya may monitor an individual's use of network services (e.g., internet and email access) to ensure the security and availability of Avaya's network.
- Avaya's assets which include employee time, work and work product; cash and accounts; physical assets; intellectual property; and other proprietary or nonpublic information, must only be used for company business.
- Avaya's assets should be:
 - Safeguarded against loss, damage, misuse or theft.
 - Monitored for any loss, damage, misuse or theft, and any such events should be reported as soon as possible.
 - Not used in a manner that would result in or facilitate the violation of law.
- Assets entrusted to the company's custody by customers, suppliers and others should be used and safeguarded in the same manner as company assets.
- Sexually explicit content and content inconsistent with Avaya's policies, Avaya's corporate values, or generally accepted business norms are prohibited.
- Do not circumvent Avaya's security controls that are intended to protect employees and the company.
- Refer to Avaya's Security Policies for additional information.



Additional Policies and Resources

[Data Breach Response](#)

[Avaya Security Standards](#)

AI Policy

Our Policy

Artificial Intelligence (AI) technology presents unique opportunities and challenges to every organization. To maximize the beneficial opportunities inherent in AI, while minimizing risks, we have established an AI Use Policy, AI Enablement Committee and AI Risk Assessment Team. The AI Use Policy details the principles, responsibilities, and ethical considerations for using AI at Avaya. It is designed to ensure that AI technologies are used responsibly, transparently, and in alignment with our organizational values and legal obligations. Avaya reserves the right to access and monitor the use of AI technologies on any company-issued devices or device that appears on company managed networks.

Showing Accountability and Trustworthiness

AI accountability is critical to maintaining trust and integrity within our organization. Familiarize yourself with the AI Use Policy, and always remain vigilant and uphold our standards, including in the following situations:

- If you become aware of potential bias or discrimination in AI-generated outputs.
- If you become aware of data privacy concerns regarding the use of AI such as inputting personal data into AI technologies.
- If you become aware of unauthorized access or misuse of AI systems or data.
- If you become aware of requests or attempts to bypass established AI protocols or ethical guidelines.

Promptly report any of these issues (or any other concern) to your manager or email the [Ethics and Integrity Team](#). Your swift action ensures the responsible use of AI technologies and protects Avaya and its stakeholders.



Additional Policies and Resources

[AI Policy](#)

Records Management

Our Policy

You have a responsibility to:

- Retain records, whether hard copy or electronic, in accordance with Avaya's Records Retention Schedule or applicable law.
- Ensure secure disposal of records that are no longer needed as per Avaya's Records Retention Schedule.
- Ensure secure disposal of Personal Data as per Avaya's Personal Data Retention schedule.

Showing Accountability and Trustworthiness

When working with company records, remember:

Familiarize yourself and comply with Avaya's records retention policy and schedules.

Don't destroy anything that should be retained.

Prepare them accurately, in a timely manner, and in reasonable detail.

Where applicable, sign them only if they are accurate and complete.

Retain records that are subject to a legal hold.

Dispose of records containing personal data as per the Personal Data Retention schedule.

Q: You no longer have many hard copy records as you keep everything in electronic format. Do you need to keep the electronic copies for the same time as if they were hard copies?

A: Yes, electronically stored information is subject to the same requirements as hard copies.

Q: Is email subject to the same retention schedule as other documents?

A: No, email is not considered a record, it is a method of communication. Any information contained in email that is a record – attachments or approvals, etc., must be removed from the email system and preserved in a manner that meets the retention guidelines.



Additional Policies and Resources

[Records Management](#)

| [Records Retention Schedule](#)

| [Personal Data Retention Schedule](#)

External Communication and Social Media

Our Policy

Avaya believes in fostering a thriving online community. We support open dialogue and the free exchange of ideas.

Avaya employees must use their best judgment and act responsibly when generating content for social media.

New technologies and vast social media tools available have given us many new communications options. In light of the fact that these are public forums, extra care must be taken when using social media platforms for company business.

Showing Accountability and Trustworthiness

- Use social media responsibly. Never misrepresent yourself or use social media for deceptive practices.
- Never speak on behalf of Avaya unless authorized to do so. Play it safe.
Only re-post and share official company statements. Make it clear that the views you express are solely your own.
- Refer all public inquiries to an Avaya Corporate Communications representative. Never intimidate, harass or discriminate against fellow employees in an online setting.
- Never disclose or discuss Avaya's confidential, proprietary or material, nonpublic information in a public setting (i.e., in conversations in public places, social media settings, group or insecure emails, or otherwise).
- Only send, store or receive Avaya confidential, proprietary or material, nonpublic information using corporate approved systems such as email, instant messages, and file sharing.

Q: You've been working on Avaya's latest product and want to let your industry colleagues know of a major milestone that was just completed. Can you post something to an online industry chat room?

A: No. You cannot post nonpublic information to a public or semi-public forum.

Q: You're involved in a time-sensitive project that requires a significant amount of travel. You take a lot of calls on your mobile phone while in airports and public areas such as hotel lobbies, trade show floors, etc. Does this pose a risk to the company?

A: Yes. What you say in public, once heard, is no longer protected. You need to be mindful of your surroundings when participating in sensitive conversations in public spaces.

Q: You're leaving the office one evening and are approached by the press regarding a story on one of Avaya's executives. You've known this executive for years; can you speak to the reporter?

A: No. Any communications with the press must be reviewed and authorized by Avaya Corporate Communications.



Additional Policies and Resources

[Social Media Policy](#) | [Competitive Information and Comparative Claims](#)

International Trade

Our Policy

Avaya complies with all applicable import and export controls, as well as economic sanctions laws that impose controls on the transfer of goods, technology, technical information, software and services.

Avaya also complies with all applicable customs laws, which apply in some form to virtually every import in every country (i.e., prohibitions, restrictions, duties, taxes or fees payable by the importer). All items imported by Avaya must be reported to all relevant customs agencies.

Avaya must comply with applicable anti-boycott laws and regulations. If you learn of a boycott request or if you are asked to participate in a boycott in any country, you should consult the legal team before taking any action.

Showing Accountability and Trustworthiness

- Familiarize yourself with Avaya's Global Trade Compliance Policy and be aware of activities that raise issues under these laws.
- Follow all business procedures as it relates to export controls.
- Ensure that licenses, and proper authorizations are in place for the export of technology, software, products and services.
- Trade Compliance laws differ from country to country and are often complex. Seek guidance from the global trade team regarding restrictive trade procedures and boycotts to make sure you are operating in compliance.
- Ensure accurate export documentation of transactions to ensure compliance with "know your customer, know your supplier" rules.



Additional Policies and Resources

[Global Trade Compliance Policy](#)

Review the [Global Trade Support](#) website as needed or contact the Global Trade Team at globaltrade@avaya.com

SUPPORTING OUR COMMUNITIES

Safe and Healthy Workplace

Avaya is committed to providing a safe and secure work environment that empowers everyone to do their best work: one that encourages innovation, creative thinking, and teamwork.

Avaya is committed to maintaining industry standards, consistent with comparable organizations, in all areas of employee safety and health. To support this commitment, we comply with all applicable health and safety laws of the countries where Avaya conducts business.

Everyone associated with Avaya is responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to their manager, Human Resources Business Partner or the Ethics Help Line. Avaya maintains a zero-tolerance policy for workplace violence. You are not permitted to bring anything to work that could be considered a weapon. If you believe there is a potential for violent behavior, contact the Avaya Ethics Helpline at **1-877-99-ETHIC** or **+1-908-953-7276** or [file a claim online](#). If there is an actual act of violence at your location, please contact local emergency response.

Avaya prohibits employees from working under the influence of drugs and alcohol. Working under the influence of these substances can impair judgement and create a safety hazard. Medication prescribed to you by a doctor can also affect your ability to do your job safely. Check with your doctor about any impact your prescription might have on your ability to perform your job and communicate any concerns or questions about Avaya's Global Reasonable Accommodation/Work Adjustment Process to your supervisor, or Human Resources.

Showing Accountability and Trustworthiness

Employees are responsible for their safety, the safety of those around them and for following safe work practices. Employees are expected to:

Follow response procedures, and participate in emergency evacuation drills.

Report work-related injuries, illnesses and incidents, as well as acts or threats of violence.

Report unsafe conditions to the location-specific Facilities Team.

These conditions may include but not be limited to: Electrical hazards, basic clutter, blocked access to fire safety equipment, slip, trip and fall hazards, unsafe driving, unsafe practices at customer sites.



Reporting

[Click here](#) to report work-related injuries, illnesses or incidents.

[Click here](#) to report motor vehicle accidents (including for owned, leased, rented or personal vehicles), including insurance notification requirements.



Additional Policies and Resources

[Environmental, Health and Safety Policy](#)

Political Involvement

Avaya does not permit employees to use Avaya resources or assets to influence or contribute to political parties or candidates. Any involvement in political activities is personal and voluntary and should be done on your own time and with your own resources.

Showing Accountability and Trustworthiness

Understand the restrictions on political involvement and reach out to Avaya Legal counsel with any questions regarding company policies and federal laws that govern political activity.

Human Rights

Avaya has a longstanding commitment to ethical business conduct in our operations and supply chains, and we uphold and respect human rights as contained in international laws and standards, including the United Nations Universal Declaration of Human Rights (UDHR), the eight Core Labour Conventions developed by the International Labour Organization (ILO), and the Organization for Economic Cooperation and development (OECD) Guidelines for Multinational Enterprises.

We recognize employee's lawful rights to freely chosen employment, fair wages and hours, freedom of association and collective bargaining, and a work environment free from discrimination, harassment, and retaliation.

We implement and enforce effective systems and controls to ensure that modern slavery does not take place within our operations and supply chains as detailed in our Modern Slavery and Human Trafficking Statement. Avaya complies with the applicable employment laws of every country in which we operate, and we expect the same of our business partners.



Additional Policies and Resources

[Avaya Human Rights Statement](#) | [Supplier Code of Conduct](#) | [Channel Partner Code of Conduct](#)

CLOSING THOUGHTS

Any failure to read, understand or acknowledge the Code does not exempt you from your responsibility to comply with its provisions, applicable Avaya policies and applicable laws and regulations.

Waivers

Any waivers of any provisions of the Code with respect to any director or executive officer requires the approval of by Avaya's Board of Directors or by a committee thereof. Any such waivers will only be made in limited circumstances and in conjunction with any appropriate ongoing monitoring and will be disclosed as required under applicable law and regulations.

Amendments

We are committed to continually reviewing and updating our policies. We therefore may amend this Code at any time and for any reason.

Employment

Unless otherwise provided by local law or a collective bargaining or other labor agreement, the Code is not a contract of employment and does not create any contractual rights of any kind between Avaya and its directors, officers or employees. Moreover, unless prohibited by applicable law or unless an Avaya employee's terms and conditions of employment are governed by a collective bargaining or other labor agreement or there exist other applicable law or public policy exceptions, employment at Avaya is on an "at will" basis in the United States and elsewhere, where applicable. Please note employment in certain other countries may not be "at will". "At will" means that an employee may terminate his or her employment at any time and for any reason, and, similarly, Avaya may generally terminate an employee's employment at any time and for any reason, or for no reason at all.



About Avaya

Avaya is a global enterprise software leader that helps the world's largest organizations and government agencies forge unbreakable customer connections. The Avaya Infinity™ platform is built to unify fragmented experiences, equipping enterprises to evolve their contact centers into connection centers and strengthen relationships that create business value. Learn more at www.avaya.com.

