Poly Modern Slavery and Supply Chain Transparency Statement

This statement applies to Plantronics, Inc. (and its subsidiaries worldwide (hereinafter collectively “Poly” or “Company” [NYSE: POLY]). Poly is a global communications company that powers meaningful human connection and collaboration. Poly combines legendary audio expertise and powerful video and conferencing capabilities to overcome the distractions, complexity and distance that make communication in and out of the workplace challenging. We believe in solutions that make life easier when they work together and with our partners’ services. Our headsets, software, desk phones, audio and video conferencing, analytics, and services are used worldwide and are a leading choice for every kind of workspace. For more information, please visit our website: www.poly.com.

Modern slavery manifests in different ways, including through forced labor, human trafficking, and slavery. Poly is a socially responsible company, respects human rights and freely chosen employment, and does not support the use of slave labor in any form either in our Company or in our supply chain anywhere in the world. Pursuant to the California Transparency in Supply Chains Act 2010 and the United Kingdom Modern Slavery Act 2015, we make the following annual statement to describe the efforts taken by Poly to address modern slavery and transparency in our Company and in our supply chain for the Financial year 2021ending April 3, 2021.

Poly’s Actions

Poly strongly opposes forced labor, human trafficking, and slavery in any form. As an Affiliate Member of the Responsible Business Alliance (“RBA”), Poly supports the RBA Code of Conduct and endeavors to ensure adherence to the Code in our own operations and those of our suppliers, including acting in a robust and systematic manner to evaluate and if found, remove any human rights issue in our supply chains. Poly’s efforts in this regard include the following actions: actions:

1. Written Policies and Procedures: Poly has published policies, including a Global Human Rights Policy, that define our commitment to international labor and human rights standards. Our policies are available online on our Corporate Responsibility home page. Poly maintains an employee Code of Conduct that sets forth our global expectations for employees to act ethically and responsibly and promotes fundamental human rights in all our business operations. We expect our suppliers and business partners to adhere to these standards as well and have set forth these requirements in a supplemental Supplier Code of Conduct. The Codes are reviewed at least annually and updated to comply with any new applicable laws and regulations. Poly also maintains procedures related to the selection, onboarding, audit and retention of suppliers, as more fully described below.

2. Supply Chain verification and certification: Poly’s purchasing and supplier management team verifies surveys and performs due diligence, including a risk assessment based upon geographic locations, spend, and other targeted risk factors, on our suppliers before they are approved to conduct business with Poly. Poly also requires its suppliers to certify their compliance with the Poly Supplier Code of Conduct. The Supplier Code of Conduct provides important requirements concerning the standards of employment, including compliance with all local laws and regulations on labor practices. This includes the prohibitions against the use by suppliers of any forced labor, whether in the form of human trafficking, slavery, prison labor, indentured labor, bonded labor, or otherwise. Furthermore, Suppliers are prohibited from incorporating into their products materials which were produced using forced labor.
3. **Conduct Audits of Suppliers:** Through its affiliate membership with the RBA, Poly reviews those suppliers that have been audited through the RBA. Poly continues to review and assess supplier audit programs to determine how to further develop and ensure that our suppliers meet Poly’s requirements. During the Financial Year in question, Poly has not been made aware of any violation of any anti-slavery legislation.

4. **Accountability Standards and Monitoring:** Poly’s agreements with its suppliers and the Poly Supplier Code of Conduct permit the termination of any supplier found in violation of the laws banning forced labor, slavery and human trafficking. Poly monitors compliance with the Supplier Code of Conduct in multiple ways, including through its standard contract language which reserves the right to conduct onsite inspections. Poly also maintains an ethics and compliance hotline hosted by a third-party service provider. The ethics hotline provides employees, suppliers, and customers with a whistle-blowing mechanism to confidentially report any identified risk or deviations from Poly’s principles and policies. We have policies in place to prevent retaliatory action against those who make a good faith report. We have not identified any non-conformities relating to slavery and human trafficking legislation from our ethics hotline in the last Financial year.

5. **Conduct Training:** Poly conducts training for all employees on the Code of Conduct, as well as for employees in the supply chain to ensure that they are knowledgeable and aware of issues and risks surrounding the supply chain, including human trafficking and slavery. Part of this training encourages employees and suppliers to notify Poly in the event of any actual or suspected violation of anti-slavery legislation.

**Sourcing Minerals Responsibly**

To help address the human rights risks in our mineral supply chain, Poly has implemented a comprehensive due diligence process. The Poly Responsible Minerals Program aligns to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Details about this program including due diligence strategy, efforts to hold suppliers accountable, and results of our work can be found in our [Conflict Minerals Report](#).

It is vitally important to Poly that all persons involved with our products, including Poly employees and all members of its supply chain, are treated with dignity and respect. Poly will continue to review its policies, procedures, and practices on a regular basis to safeguard against any mistreatment of persons involved in its supply chain.

**Applicable Approvals:**

This statement has been reviewed and approved by the following signatories:

**Charles Boynton**
Name: Chuck Boynton  
Title: Director, Plantronics Limited UK

**Grant Hoffman**
Name: Grant Hoffman  
Title: EVP, and Chief Supply Chain Officer, Plantronics, Inc.

Last Revision date: June 2021, for Fiscal Year ending April 3, 2021