

SHORETEL, INC.

Conflict Minerals Policy May 20, 2014

Recognizing the legal and compliance risks and other possible adverse impacts that may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (“Conflict Minerals”), ShoreTel, Inc. (“ShoreTel”) commits to adopt, widely disseminate and, subject to each supplier’s position in the supply chain and ShoreTel’s relative leverage with respect to each supplier, incorporate in agreements with manufacturing suppliers the following policy on Conflict Minerals, to the extent such suppliers have not adopted similar policies on Conflict Minerals.

Regarding serious abuses associated with the extraction, transport or trade of minerals:

- I. While sourcing from, or operating in, conflict-affected and high-risk areas, ShoreTel will not profit from, contribute to, assist with or facilitate the commission by any party of the following, and it shall seek the same commitment from its suppliers by integration of this Conflict Minerals Policy into its manufacturing supplier agreements:
 - any forms of torture, cruel, inhuman and degrading treatment;
 - any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
 - the worst forms of child labor, as set forth in ILO Convention No. 182;
 - other gross human rights violations and abuses such as widespread sexual violence; or
 - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

- II. If ShoreTel determines that there is a reasonable risk that a manufacturing supplier is profiting from, contributing to, assisting with or facilitating the commission by any party of the acts identified in Section I, ShoreTel will enforce this Conflict Minerals Policy and the contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by ShoreTel from the applicable supplier.

Regarding direct or indirect support to non-state armed groups:

- III. ShoreTel shall not directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals, and it shall seek the same commitment from its manufacturing suppliers by integration of this Conflict Minerals Policy into its manufacturing supplier agreements. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
- illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;
 - illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
 - illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups:

- IV. If ShoreTel determines that there is a reasonable risk that a manufacturing supplier is sourcing from any party providing direct or indirect support to non-state armed groups as defined in Section III, ShoreTel will enforce this Conflict Minerals Policy and the contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by ShoreTel from the applicable supplier.

Regarding public or private security forces:

- V. ShoreTel shall not directly or indirectly support public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders, and it shall seek the same commitment from its manufacturing suppliers by integration of this Conflict Minerals Policy into its supplier agreements.
- VI. ShoreTel shall only engage public or private security forces in accordance with the Voluntary Principles on Security and Human Rights, and it shall seek the same commitment from its suppliers by integration of this Conflict Minerals Policy into its manufacturing supplier agreements.
- VII. ShoreTel will, where reasonable and subject to ShoreTel’s position in the supply chain, support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security

forces for the provision of security could be improved, and, subject to each supplier's position in the supply chain and ShoreTel's relative leverage with respect to each supplier, it shall seek the same commitment from its manufacturing suppliers by integration of this Conflict Minerals Policy into its supplier agreements.

- VIII. ShoreTel will, where reasonable and subject to ShoreTel's position in the supply chain, support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites, and, subject to each supplier's position in the supply chain and ShoreTel's relative leverage with respect to such supplier, it shall seek the same commitment from its manufacturing suppliers by integration of this Conflict Minerals Policy into its supplier agreements.

Regarding risk management of public or private security forces:

- IX. If ShoreTel determines that there is a reasonable risk that a manufacturing supplier is indirectly or directly supporting public or private security forces in violation of Sections V-VIII above, ShoreTel will enforce this Conflict Minerals Policy and the contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by ShoreTel from the applicable supplier.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

- X. ShoreTel will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals or to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export, and it shall seek the same commitment from its manufacturing suppliers by integration of this Conflict Minerals Policy into its supplier agreements.

Regarding money laundering:

- XI. ShoreTel will, where reasonable and subject to ShoreTel's position in the supply chain, support efforts, or take steps, to contribute to the effective elimination of money laundering where it identifies a reasonable risk of money laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers, and it shall seek the same commitment from its manufacturing suppliers by integration of this Conflict Minerals Policy into its supplier agreement.

Regarding the payment of taxes, fees and royalties due to governments:

XII. ShoreTel will take reasonable efforts to ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments.

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money laundering and payment of taxes, fees and royalties to governments:

XIII. If ShoreTel determines that there is a reasonable risk that a manufacturing supplier is engaging in bribery, fraudulent misrepresentation of the origin of Conflict Minerals or money laundering in violation of Sections X and XI above, or is in violation of Section XII above, ShoreTel will enforce this Conflict Minerals Policy and the contractual provisions binding such supplier related to such policy by means of a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by ShoreTel from the applicable supplier.