

## **Anti-Slavery and Anti-Human Trafficking Policy**

Adopted March 2014

ShoreTel, Inc. is committed to ensuring that neither its employees or contractors or its suppliers use slave labor or engage in human trafficking. Pursuant to this Anti-Slavery and Anti-Human Trafficking Policy (the “Policy”), ShoreTel specifically prohibits its suppliers from using forced labor of any kind. ShoreTel’s Code of Business Conduct and Ethics & Whistleblower Policy establishes ethical business conduct as critical to our business and our expectation of compliance with applicable laws.

ShoreTel monitors its supply chain for compliance with this Policy by engaging in quarterly business reviews. ShoreTel generally does not engage third parties (a) to verify product supply chains to evaluate and address risks of human trafficking or slave labor laws or (b) audit suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. However, ShoreTel promptly and thoroughly investigates any claims or indications that a supplier is engaging in human trafficking or slave labor, or is otherwise not complying with this Policy. Any such claim made through our whistleblower process would be reported to appropriate ShoreTel personnel or others as appropriate (*e.g.*, the Board of Directors, Corporate Governance and Nominating Committee or the Audit Committee), along with the resolution of the claim and/or the findings of the investigation. ShoreTel does not require certification from direct suppliers that materials incorporated into the product comply with laws regarding slavery or human trafficking of the country or countries in which they are doing business. ShoreTel maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and human trafficking. The Supply Chain management team and all ShoreTel executives receive training on ShoreTel’s Code of Business Conduct and Ethics & Whistleblower Policy, although specific training on eradicating slave labor or human trafficking is not generally provided.

ShoreTel will not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labor.