



California Transparency in Supply Chains Act

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (the "Supply Chains Act") will go into effect. The Supply Chains Act seeks to eradicate slavery and human trafficking from product supply chains and requires that companies disclose their efforts to ensure that their supply chains are free from slavery and human trafficking.

As a member of the Electronic Industry Citizenship Coalition (EICC), Polycom is committed to ensuring the highest standards of social responsibility wherever our products are made. We expect our suppliers to share our commitment in providing safe working conditions, treating workers fairly and with dignity and respect, and using environmentally responsible manufacturing processes.

Supply Chain Verification and Certification

Our key suppliers are members of the EICC and are required to adhere to the EICC's Code of Conduct. The EICC is a third party organization that promotes an industry code of conduct for global supply chains to improve working and environmental conditions. Verification of a supplier's adherence to the EICC's Code of Conduct is conducted externally through the membership requirements of the EICC.

In addition to adherence to the EICC's Code of Conduct, our key suppliers represent and warrant to us that they will perform their obligations to Polycom in compliance with all applicable foreign, federal, state and local statutes and regulations.

Risk Assessment and Audits

We assess new suppliers and periodically review current suppliers to determine the level of risk associated with a number of issues, including quality and safety. We conduct internal audits using a self-assessment questionnaire that is sent to new and current suppliers. The results of the audit are reviewed internally by Polycom. Recently, we added questions to our questionnaire for 2012 and beyond to assess whether a supplier may have issues with respect to slavery and human trafficking. In the event we believe a supplier is not in compliance with our standards, we will insist that they implement a corrective plan of action. If cases of non-compliance are not resolved in a timely manner, we will eliminate such supplier from our supply chain.

Internal Accountability and Training

Polycom strives to maintain a robust internal training curriculum that is reviewed annually for new issues in compliance. Additionally, we conduct internal training on our Code of Business Ethics and Conduct to ensure our employees understand our standards of conducting business with the highest degree of ethical behavior and in compliance with the law. All employees are required to acknowledge and adhere to our Code of Business Ethics and Conduct. Violations of our Code of Business Ethics and Conduct may subject the employee to corrective action, including termination of employment.

We are dedicated to expanding our standards and to taking any other measures in the future deemed critical to our efforts to eradicate slavery and human trafficking from our supply chain.