



# AVNET SUPPLIER CODE OF CONDUCT

Rev.2, March 2023

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## 1. Introduction/Preamble Avnet

“Suppliers” addressed by this Code include natural persons and legal entities – and their affiliated companies – which render supplies or services to Avnet, for example suppliers, consultants, commercial agents, contractors, and other suppliers and intermediaries for goods and services. Avnet is committed to environmentally and socially responsible business management. We expect the same conduct from all our suppliers. We also require all our employees to respect the principles of environmentally and socially responsible and ethical conduct and to integrate these principles into our company culture. Furthermore, we strive continuously to optimize the sustainability of our corporate activities and our products or services, and we ask our suppliers to contribute to these efforts in the spirit of an integrated approach.

## 2. Social Responsibility

Suppliers are obliged to protect human rights and to treat every employee with fairness, dignity, and respect. The rights of personality, dignity and privacy of the employees are to be respected. Every Supplier must take appropriate measures to avoid the use of raw materials in its products that directly or indirectly finance such groups that violate human rights and expect that the above is also requested 1:1 from the Supplier with its suppliers and implemented accordingly. Avnet's Global Human Rights Policy can be found on [www.avnet.com](http://www.avnet.com). This Policy broadly defines our approach to respecting human rights in our operations and value chain. We expect our business partners to share our commitment to protecting human rights.

Scope: This policy applies to all employees and contractors of Avnet, Inc., and its subsidiaries worldwide (“Avnet”).

## 3. Business Ethics

Avnet needs its supply chain to be responsible global citizens and adhere to laws and regulations not only within the US, but in all countries in which Avnet supplies. In addition, to our minimum expectations, our supply chain shall be encouraged to adhere to the Responsible Business Alliance Code of Conduct, for the fair treatment of workers, their health and safety in their work environment, for the protection of the environment, and for excellent business ethics e. g. complying with management systems for.

- Social Responsibility like ISO 19600
- Anti-Bribery / Anti-Corruption programs as of ISO 37001
- Compliance Management Systems following e. g. ISO 19600

### Compliance with labor rights

Suppliers must respect the freedom of association, the right to collective bargaining and the principles of equal opportunities. In their recruitment and employment policies, they must undertake not to discriminate against employees or subject them to reprisals on account of for example their gender, age, ethnic origin, nationality, color, disability, sexual orientation, religion, political convictions, or any other protected characteristics. All forms of physical or psychological violence against employees and sexual harassment must not be tolerated. Suppliers must ensure that they do not make use of or profit from any type of child or forced labor. All national legislation and international agreements that specify a minimum age for employees must be complied with. The remuneration and working hours of the Suppliers' employees must be fair and balanced and within the respective legal framework. Avnet does not and will not accept any items from our Suppliers that are the product of forced or slave labor.

As a signatory of the UN Global Compact, Avnet, and all subsidiaries under its control, are committed to integrity and the principles of the UN Global Compact in all aspects of their business conduct with customers,

suppliers, employees, and other stakeholders. This Code contains mandatory requirements for all cooperative activities with Avnet. Avnet reserves the right to amend this Code of Conduct in its discretion and coordination with Supplier and expects appropriate amendments to be implemented by its business partners.

The safety and health of employees in their workplaces must be ensured. A work environment must be provided that promotes accident prevention and minimizes health risks for employees. Suppliers must comply with the health and safety regulations of the country concerned and require employees to do so as well. Inasmuch as permitted by national law, Suppliers' employees must be allowed to form associations and stakeholder groups to represent their collective interests.

### **Fair competition and anti-trust enforcement**

Suppliers are expected to adhere to the principle of fairness in competition and comply with applicable antitrust regulations. Suppliers must not enter into any unlawful agreements with Avnet or competitors and must not unduly distort or affect competition. Unfair price or bid rigging, market-sharing agreements or the abuse of a dominant position are not permitted.

### **Combating corruption**

Avnet does not tolerate unlawful bribery or corruption. Corruption is prohibited virtually worldwide by national laws and international conventions.

Avnet expects its Suppliers to ensure that no benefits are promised or granted to employees of Avnet with the intention of obtaining a business advantage. For consultants and intermediaries, the service provided, and financial consideration received in return must always be balanced.

Conversely, the Supplier shall not, under any circumstances, demand, offer or grant bribes, kickbacks or other illegal payments, employment to related parties, incentives, gifts, entertainment, favors or other benefits of value to obtain business opportunities with Avnet. Avnet expects Suppliers not to tolerate any kind of unlawful contributions in dealing with government officials and authorities. In the case of tendering, the laws and regulations on fair competition must be complied with.

### **Money laundering**

Suppliers are obliged to comply with all statutory requirements aimed at preventing money laundering and must not participate in any form of money laundering activity.

### **Preventing conflicts of interest**

Suppliers must act transparently and with integrity in relation to their business activities. Any direct or indirect close relationship between Suppliers and Avnet employees that has an impact on business relations, or comparable cases, must be disclosed to Avnet. The conflict of interest shall be disclosed before the start of negotiations or as soon as the conflict comes to light.

### **Donations and sponsorships**

Donations and sponsorships are solely made on a voluntary basis and in accordance with applicable law. They are not to be used to obtain unlawful business advantage. Avnet provides sponsorship support to third parties in return for the opportunity to promote Avnet's name, image, product, or services in association with an event or activity. Sponsorships do not include charitable contributions (in cash or in kind), which are made without the expectation of a direct commercial return and are only made to government-recognized charities. Avnet does not give donations to individuals nor to political campaigns. Supplier, consultants, commercial agents, contractors, and other suppliers and intermediaries for goods and services, employees are to support Avnet with the operation of the above.

### **Data protection**

Suppliers must respect and comply with applicable data protection laws and regulations. In addition, confidential business data relating to Avnet must be kept securely and may not be used or disclosed to third parties without prior consent.

### **Confidential data and intellectual property**

Suppliers must ensure that confidential information and secrets obtained during business activities with Avnet are treated in strict confidentiality and not used or disclosed to third parties.

### **Cybersecurity**

Suppliers are obliged to safeguard their information technology assets through proactive cybersecurity measures to create and maintain a secure infrastructure and promote a culture of security awareness throughout their organization.

Suppliers are obliged to promptly notify Avnet if there is a suspected or confirmed cybersecurity incident related to Avnet systems or data.

### **Import and export regulations**

Suppliers are obliged to comply with all applicable import and export control regulations, sanctions, embargoes, laws, edicts, government decrees and directives relating to the shipment, import, export, transit, conveyance, transport or dispatch of goods and the transfer of technologies.

## **4. Environmental Responsibility**

Suppliers are obliged to comply with all applicable laws and international environmental standards and to keep environmental impacts to a minimum. Suppliers should implement appropriate management systems to avoid environmental risks and improve existing environmental standards.

Only products and services according to the technical specifications and agreed within the business contract between Parties, may be manufactured and delivered to Avnet. These products are not allowed to contain any program routines or technical devices designed to evade legal or regulatory requirements.

Suppliers should encourage the development and diffusion of environmentally friendly technologies. The Avnet Global Environmental Policy can be found on [www.avnet.com](http://www.avnet.com).

## **5. Implementation of Requirements**

### **Compliance with the Code**

Every Supplier is obliged to comply with the standards of this Code. The Code forms a fundamental part of any business relationship between Avnet and the Supplier. Violations of the standards set forth in this Code may result in termination of the business relationship or the assertion of other claims in accordance with the concluded Agreement. The Supplier shall endeavor to ensure that its contractual partners also comply with the provisions of the Code.

### **Compliance with laws, rules, and regulations**

Suppliers undertake to comply with all applicable laws, rules, and regulations of the countries in which they conduct their business. Suppliers should maintain appropriate control systems within their business operations that prevent infringements of the law and enable their investigation. Supplier is obliged to assist and provide data/information upon request to enable Avnet to comply with laws and regulations

## Declaration of the Supplier

**We declare herewith:**

We have received the Avnet Supplier Code of Conduct and we are committing us herewith, in addition to our responsibilities under the agreed contracts with Avnet, to meet the requirements of this Code of Conduct.

We shall endeavor to ensure that our contractual partners also comply with the provisions of this Code of Conduct.

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**Location, Date**

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**Name and function, Company Stamp**

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**Signature**

This document should be signed by an authorized representative of the company and must be returned within 20 working days after receipt.