## Avnet's Response and Remediation Guidelines for Violations of Avnet's Global Human Rights Policy and Statement against modern slavery and human trafficking

Avnet's commitment to Human Rights extends beyond its own operations to its entire value chain. Avnet has established a Global Human Rights Policy and Statement against modern slavery and human trafficking (the "Human Rights Policies") that aligns with Human Rights standards, covering aspects such as health and safety, forced labor, child labor, wages, and working conditions. This approach ensures that decent work is provided not only to Avnet's employees but also to those within its value chain.

Additionally, Avnet has implemented the following Response and Remediation Guideline for responding to allegations of violations of its Human Rights Policies, which includes steps such as notifying relevant internal personnel, seeking support from partners and organizations, protecting harmed workers, and preventing further risks to them. The process also involves investigating and verifying incidents, remediating harm to workers, mitigating and preventing future harm, and incident reporting and tracking.

This comprehensive approach demonstrates Avnet's dedication to upholding Human Rights standards throughout its operations and supply chain. Road Map/Outline:

| Protect People First                    | Take Responsibility  | Listen to Victims                                       |
|---|--|---|
| <u>STEP ONE</u><br>Investigate & Verify | STEP TWO<br>Corrective Action<br>& Remediation of<br>Harm to Workers | <u>STEP THREE</u><br>Mitigate & Prevent<br>Future Harms |

Upon receiving information or allegations of forced labor, slavery, or human trafficking, Avnet's Ethics and Compliance Office will carefully and immediately activate the following investigation and remediation protocol.

## Investigate & Verify

Upon receipt of a complaint, Avnet will seek to understand who the complainants are; what human rights may have been violated or may be at risk of being violated; whether a criminal offense has been committed; how Avnet is connected to the violation or offense and whether the violation or offense is salient.

Investigation steps may include, but are not limited to, one or more of the following:

- 1. Initiate investigation and verification.
- 2. Gather information.
- 3. If the complaint concerns a supplier or customer, review contractual terms and requirements to identify parties' obligations regarding modern slavery, forced labor, and human trafficking, potential breaches, and work with the supplier or customer to formulate a response.
- 4. Determine the relationship to harm. The investigation should determine if Avnet has caused, contributed to, or is directly linked to the harm, which will inform the response to remedy.

When required or appropriate, local governmental authorities will be notified of the investigation process or for assistance in the investigation process.

## **Corrective Action and Remediation of Harm to Workers**

If the investigation substantiates a violation of the Human Rights Policies, Avnet will take appropriate measures to sanction the party or parties involved. For Avnet employees and thirdparty service providers, violations of the Human Rights Policies will result in disciplinary action, up to and including termination of employment or the third-party contract. If the violation involves the supply chain, non-compliant customers, suppliers, or partners may be excluded from the supply chain.

If Avnet has contributed to or caused harm to a worker in violation of its Human Rights Policies, Avnet will take appropriate steps to remediate the harm to the worker, including, but not limited to extracting the worker from the job and cooperating with the proper governmental authorities and non-governmental organizations to ensure the worker's well-being and help provide remedy to those harmed.

## Mitigate & Prevent Future Harm

In the event of a violation of our Human Rights Policies, Avnet will take remedial and corrective measures to ensure that such violations do not occur in the future.

Steps to address the cause of the harm and mitigate and prevent future harm may include one or more of the following:

1. Analyze each concern identified in the investigation to determine the root cause of the violation and develop a corrective action plan with clear timelines and priority actions to

address the cause of the harm. Prioritize the most urgent actions, from the perspective of risks to people.

- 2. Monitor progress according to corrective action plan timelines.
- 3. Assess Avnet's practices, policies, and systems to determine if changes should be made.
- 4. Update contracts, codes of conduct, supplier and customer terms, and training tools to address any potential gaps and lessons learned.
- 5. Conduct follow-up assessments to ensure on-going compliance with corrective action plan, Human Rights Policies, and relevant laws and standards.
- 6. Human rights complaints and outcomes will be recorded and monitored in the Ethics Alertline system.

Avnet prohibits and does not tolerate retaliation of any kind against persons who in good faith report violations of the Human Rights Policies or who cooperate with any internal or governmental investigation of human rights violations, including human trafficking, modern slavery, or child labor.