



# DECLARATION OF PRINCIPLES HUMAN RIGHTS

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## 1. OUR COMMITMENT

As a leading international distribution company in the semiconductor sector, IP&E as well as a manufacturer of displays and other applications, we at Avnet are aware of our responsibility in a global world; especially in the context that the components we distribute or assemble are manufactured worldwide.

In our understanding, we can only be successful in business in the long term if our business activities are in harmony with people and the environment. That is why, we strive to do the right thing and be accountable to our key stakeholders by protecting our environment, embracing social responsibility and inclusiveness, and ensuring good corporate governance. We are committed to complying with the requirements of applicable Supply Chain Due Diligence (SCDD) rules and regulations. Therefore, Avnet is committed to respecting human rights and environmental concerns within our own business activities as well as in our global supply and value chains, to sensitize our employees, suppliers and contractors regarding human rights and to work towards preventing human rights and environmental risks and violations, and to give those affected the opportunity to demand redress.

## ORIENTATION TO STANDARDS AND AVNET GUIDELINES

Avnet aligns its strategies and business activities with the following internationally applicable standards on human rights, labor and, environment:

- Principles of the United Nations Global Compact
- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- UN Conventions on the Rights of the Child

Avnet also supports the Responsible Business Alliance Code of Conduct and is actively pursuing conformance to the Code and its standards.

In addition to these standards, Avnet has established its own guidelines and policies that direct our employees, officers and directors to conduct our business with the above-mentioned standards and in compliance with all legal and regulatory requirements:

- **Code of Conduct**
- **Global Human Rights Policy**
- **Human Trafficking and Modern Slavery Statement**
- **Global Environmental Policy**
- **Responsible Minerals Sourcing Policy Statement**

This declaration, as well as the aforementioned guidelines and policies, form the obligatory framework for action for our employees in all Avnet EMEA divisions.

## FOCUS OF AVNET

Within the affected people groups, there are individuals who are at higher risk of adverse human rights and environmental impacts. These potentially affected people have a distinct position because they have special needs, are socially excluded, or find it difficult to have their concerns heard.

In this respect, we focus particularly on the following groups of people, along our supply and value chain, such as

- children
- women
- elderly and/or disabled people
- ethnic/religious minorities
- people with little education or limited access to education

as well as on particularly sensitive human rights issues such as

- forced and child labor
- discrimination in any form
- adequate remuneration for work
- restriction of rights
- threats to health and safety in the workplace
- endangerment of health through environmental pollution.

To strengthen and support our approach on human rights, a Human Rights Delegate has been appointed.

## SUSTAINABILITY

Our sustainability strategy, targets and measures can be found in our annually published Sustainability Reports. These reports cover Avnet's global operations and are prepared in accordance with the Global Reporting Initiative (GRI) Standards.

## 2. RISK ANALYSIS, RISK ASSESSMENT AND RISK MANAGEMENT

Avnet has implemented a risk management system that incorporates the analysis of human rights and environmental risks and the assessment of these risks in order to identify, prevent and stop human rights and environmental risks and violations. It is designed to identify and assess all potential and actual human rights and environmental risks as early as possible, so that appropriate countermeasures can be taken.

Avnet continuously assesses where specific risks of human rights abuses could occur or exist in our own business activities and in our supply chain. An essential part of our due diligence is the knowledge of potential and actual adverse human rights risks or violations and impacts of our business activities on people within our supply chain or the entire value chain.

As a basis, the country risk, industrial risk and product groups are evaluated. A further risk assessment and analysis based on defined processes and with the help of external sources and available data is conducted and will identify and prioritize relevant human rights and environmental risk areas in our own business area as well as with our direct partners. Where required, appropriate remedial action will be taken. The risks that potentially may arise in our own business area and at our direct suppliers will be reviewed and monitored once a year and on an ad hoc basis.

Significant ad hoc changes in the identified risk areas must be reported immediately to [scdd@avnet.eu](mailto:scdd@avnet.eu).

The effectiveness of the defined processes and measures will be reviewed and monitored once a year and on an ad hoc basis.

Upon substantiated knowledge of possible human rights and environmental risks with or violations by our indirect suppliers, an ad hoc risk analysis will be conducted and appropriate remedial action will be taken.

### 3. MINIMIZING RISKS THROUGH PREVENTIVE MEASURES

Our aim is to prevent and mitigate any identified human rights and environmental risks and violations in our own business area as well as with our direct suppliers and service providers by implementing preventive measures and take appropriate measures. This is reflected in our risk management system and defined processes.

#### OUR OWN BUSINESS

Our Code of Conduct sets Avnet's standards in areas such as human rights, anti-corruption, data security and privacy, non-discrimination, diversity and equal opportunity, and workplace health and safety. Avnet's Global Human Rights Policy defines our approach to respecting human rights in our operations and value chain.

We create awareness by communicating proactively on Avnet's standards, this policy statement, and the requirements with regard to SCDD.

Adequate training is provided to all employees, officers and directors on Avnet's standards. This is done, for example, in the form of regular online training, meetings, etc.; the aim of this is to sensitize employees, officers and directors and ultimately to force the integration of human rights in management processes and business decisions.

#### SUPPLY CHAIN

We also expect our business partners, suppliers and service providers to share our commitment and Avnet standards.

Direct suppliers and service providers are contacted and checked by means of online self-disclosures.

Our Supplier Quality Handbook, provided to our suppliers as guidelines, is designed to inform our suppliers about our company, culture, supply chain direction and general expectations for suppliers.

We formulate concrete requirements for suppliers in the form of an acceptance of our "Supplier Code of Conduct" and will require our suppliers to handle the topic of human rights compliance appropriately internally as well as to address, demand and monitor the topic with their direct suppliers.

In case of uncertainties and ambiguities, further information is requested, information material is provided, training, education and presentations are offered - all with the aim of developing and improving awareness of human rights among our direct suppliers and service providers.

### 4. COMPLAINTS PROCEDURE

Employees and third parties outside the company have the option, and we encourage them, to report (imminent) risks and violations of our Codes of Conduct or suspected risks and violations via the **Avnet Alertline** ("whistleblowing hotline").

Other reporting resources available to our employees and contractors can be found in our Code of Conduct.

Where permitted, whistleblowers can report anonymously and, of course, confidentiality and whistleblower protection are our top priorities.

Avnet has substantial internal investigation guidelines in place, will follow up on reports appropriately and, if required, take corrective action accordingly.

In the event of violations by our direct suppliers and service providers, Avnet reserves the right, in cooperation and consultation with the direct suppliers and service providers, to demand measures, remedies and improvements regarding human rights and even, depending on the severity of the violation, to terminate the business relationship.

## 5. DOCUMENTATION AND REPORTING

Avnet refers here to (1) the annually published Sustainability Report and (2) when required to do so by law, the relevant SCDD reporting such as the report in accordance with § 10 of the German Supply Chain Due Diligence Act (LkSG), including any required reporting to the relevant authorities (e.g. in Germany the Federal Office of Economics and Export Control – BAFA).

## 6. RESPONSIBILITIES

At the highest management level, our general managers of the individual Avnet EMEA companies are responsible for respecting human rights. In addition, Avnet has established the position of a Human Rights Delegate, who oversees risk management in accordance with the Supply Chain Due Diligence Act and ensures operational implementation in the form of coordination and monitoring. An annual report by the Human Rights Delegate will be submitted to the respective managing directors.

To achieve operational implementation of the human rights' due diligence processes, a dedicated team and several specialist departments such as Environmental Affairs, ESG, Human Resources, Legal, Purchasing and Quality Management are involved. The respective managing directors will meet regularly and on an ad hoc basis and will decide jointly on individual cases and the further individual procedure in accordance with the specified processes. In addition, the dedicated team, with the support of the Human Rights Delegate and the respective managing directors will also be responsible for the continuous and systematic identification, assessment, and minimization of human rights country risks.

Avnet will audit the effectiveness of its processes at least once a year or in the event of an imminent or actual incident; this with the intention of identifying, preventing, eliminating or at least mitigating negative human rights impacts and will use these audits to achieve continuous development of its human rights' due diligence processes.

## 7. CONTACT FOR QUESTIONS

For questions regarding this declaration, please email [responsible.sourcing@avnet.eu](mailto:responsible.sourcing@avnet.eu).

In the event of any concerns, possible risks or violations with regard to human rights and environmental issues by Avnet or in its supply chain, you may submit a confidential report at any time via the **Avnet Alertline** ("whistleblowing hotline").

