

# Amphenol

## ANTI-HUMAN TRAFFICKING AND SLAVERY STATEMENT

### 1. Introduction

Amphenol is committed to treating everyone in our business and supply chains with dignity and respect. We take seriously our role in combatting human trafficking and slavery in our supply chain, and we work to ensure the well-being of the people who help make our products and provide materials to our supply chain. This statement sets out the steps Amphenol has taken to address the risks of human trafficking and slavery in our supply chain.

The California Transparency in Supply Chains Act of 2010, the U.K. Modern Slavery Act of 2015, and the Australian Modern Slavery Act of 2018 require certain commercial organizations to publish statements describing the steps the organization has taken during the prior financial year to ensure that human trafficking and slavery are not taking place in their operations or supply chains.

This Anti-Human Trafficking and Slavery Statement is made pursuant to the requirements of the above statutes and regulations. For fiscal year 2021, this statement addresses our ongoing efforts to combat and prevent human trafficking, slavery and forced, compulsory or involuntary labor in our supply chain.

### 2. Our Business and Supply Chain

Amphenol is one of the world's largest providers of high-technology interconnect, sensor and antenna solutions. Our products *Enable the Electronics Revolution* across virtually all end markets, including Automotive, Broadband Communications, Commercial Aerospace, Industrial, Information Technology and Data Communications, Military, Mobile Devices, and Mobile Networks. Amphenol has approximately 80,000 employees worldwide.

Our global supply chain consists of more than 15,000 Tier 1 Direct suppliers in almost 60 countries. Amphenol defines its Tier 1 Direct suppliers as those who provide raw materials and goods for production and with which we have direct transactional business.

### 3. Our Policies and Commitment to Prevention of Human Trafficking

Amphenol has several policies that reflect our commitment to eradicate human trafficking and slavery in our operations and supply chain.

Amphenol's [Global Human Rights Policy](#) reflects our global commitment to human rights and the integration of our commitment into our operations and supply chains. Our Global Human Rights Policy unites our core policies related to human rights and reflects our belief in the principles stated in the UN Guiding Principles on Business and Human Rights.

In our Code of Business Conduct and Ethics (“COBCE”) as well as our Responsible Labor Policy (“RLP”), Amphenol strictly prohibits human trafficking and slavery. To support Amphenol’s supplier-related compliance efforts, Amphenol has also adopted a Supplier Code of Conduct (“SCOC”) and Supplier Responsible Labor Policy (“SRLP”). Amphenol’s SCOC and SRLP are built upon and incorporate many key aspects of the Responsible Business Alliance (“RBA”) Code of Conduct, including those related to humane labor conditions, child labor, humane treatment, working and living conditions, freedom of association and wages and benefits. Our SCOC and SRLP require that our suppliers and their employees comply with the SCOC and SRLP in all aspects of their operations that relate to their business with Amphenol.

Our SRLP and SCOC expressly prohibit the use of forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

The SRLP and SCOC also require that there are no unreasonable restrictions on workers’ freedom of movement in the facilities in which they work, and no unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in a language that the worker understands. The agreement must describe the terms and conditions of employment, and no changes may be made to the employment agreement, except where necessary to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. We and our suppliers may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers’ or agents’ recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, the fees shall be repaid to the workers.

Our suppliers are encouraged to report any concerns related to issues covered by the SRLP and SCOC. In the event of a violation of our SCOC or SRLP, Amphenol reserves the right to either terminate its relationship with the supplier or to work with the supplier to implement corrective action to remedy the non-conformance, depending on its nature and severity.

Furthermore, in 2021, Amphenol adopted its Responsible Minerals Policy (“RMP”). The RMP demonstrates our commitment to responsible mineral sourcing and provides details about our responsible mineral sourcing program, which is based on RMI’s Responsible Minerals Assurance Process. Our program employs a risk-based approach to validate smelters and refiners based on their mineral procurement processes. We are mindful of the potential human rights abuses associated with mineral sourcing and remain diligent to ensure our sourcing of minerals does not perpetuate or contribute to such abuses. Amphenol regularly evaluates its responsible minerals program to reduce risks associated with mineral sourcing.

#### 4. Due Diligence / Verification

Amphenol communicates its SCOC and SRLP in five key languages to our supply chain and uses a

third-party data collection provider to assist with the identification and risk profiling of any human trafficking and slavery issues throughout our global supply chain. Amphenol's suppliers are required to affirm that they will conduct their businesses in accordance with our SCOC and SRLP, which includes our right to assess suppliers and inspect their facilities. We updated our SCOC and SRLP to align with the RBA Code of Conduct. We will continue to assess our SCOC and SRLP against any new updates to the RBA Code of Conduct.

## 5. Risk Assessment

In 2021, the scope of Amphenol's supplier risk assessment included all Tier 1 Direct suppliers. Amphenol also further refined the scope of its geographical-based risk assessment to focus on suppliers located in high-risk geographies as identified in the Global Slavery Index ("GSI") and U.S. Department of State Trafficking in Persons Report ("TIP"). We issued the Slavery & Trafficking Risk Template (STRT) v2.1 to high-risk suppliers for completion. We issued a shorter assessment, aligned with the STRT, to our suppliers located in low-medium risk locations. By including low-medium risk suppliers in our assessment strategy, while focusing greater diligence on our suppliers in high-risk areas, we are able to extract the most risk-sensitive data from our supply chain, while also detecting any unexpected deviations from low-medium risk suppliers.

Amphenol's supply chain mapping and surveying will continue to be conducted annually. Data from this exercise will provide metrics to allow us to understand the scope of any potential human trafficking or slavery issues in our supply chain and also to inform remediation decisions of any incidents of trafficked or forced labor in our supply chain.

## 6. Assessment of Effectiveness

For Amphenol, effectively managing human-trafficking and slavery risks means we must be able to facilitate positive change through our processes and activities. This starts with a strong foundational program in which continuous improvement is a core principle. Additionally, our programs are evolutionary and flexible to allow us to adapt to new regulations or localized or global events requiring our attention.

Our revised geographical-based risk assessment methodology has allowed for a more meaningful focus on those regions where the greatest risk for human-trafficking and slavery may be present. This approach, coupled with increased multi-lingual supplier communications, has helped us increase our overall supply chain assessment response rate year over year.

## 7. The Process of Consultation Among Amphenol Entities

Amphenol is truly a global company with approximately 200 manufacturing facilities in approximately 40 countries and with sales reaching virtually every corner of the globe. Amphenol maintains the same ESG policies, procedures, assessments, and training programs for each of its affiliated companies. Led by a team of ESG professionals, Amphenol provides operational support and oversight to each of its affiliates for purposes of Anti-Human Trafficking and Slavery risk assessment and accountability. We work with each of our entities on a continuous basis throughout the year.

## 8. Accountability

Amphenol maintains a robust compliance program intended to ensure a culture of ethics and compliance among Amphenol's workforce. This program includes periodic compliance training, regular communications to employees, annual certifications and multiple means of reporting concerns.

Internal accountability standards help ensure compliance with Amphenol's policies. Annually, management employees are required to complete training and certify compliance with the COBCE. Amphenol's RLP sets forth our respect and support for human rights, and our SCOC and SRLP apply the same concepts to our suppliers. Supplier accountability regarding risk of human trafficking and slavery is assessed through our above-mentioned risk assessment program.

Suspected violations can be anonymously reported by phone or email. These reporting mechanisms are available both to employees and external parties. Violations of any of these policies can result in corrective action, up to and including termination.

## 9. Training

Amphenol continues to train key employees, who have direct responsibility for supply chain management or for recruitment of new employees, on human trafficking and slavery. This training includes topics such as identification of human trafficking warning signs and prevention of human trafficking within our organization and in our supply chain as well as direction to reporting mechanisms. Additionally, we have finalized our plan and training materials for Environmental, Social and Governance and Anti-Human Trafficking & Slavery awareness training to our global workforce. We launched this company-wide training in 2021 and expect the training to be completed in early 2022. We will continue to train relevant new employees and will evaluate on-going training annually.

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Amphenol is committed to maintaining high standards of social responsibility and continuing to combat human trafficking and slavery in our supply chain.

This Anti-Human Trafficking and Slavery Statement has been approved by the Board of Directors of Amphenol Corporation.



R. Adam Norwitt  
Chief Executive Officer and Director  
Amphenol Corporation