

Amphenol

Responsible Minerals Policy

Amphenol is committed to respecting and promoting human rights worldwide. As one facet of our global approach to respecting human rights, Amphenol has implemented a responsible sourcing program for certain minerals used in the manufacture of our products. Our program seeks to ensure that our products do not contain materials derived from conflict minerals. As a member of the Responsible Minerals Initiative (“RMI”), Amphenol collaborates with customers, suppliers, peers and other stakeholders to promote responsible mineral sourcing.

Amphenol follows the Organisation for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“CAHRAs”) to develop appropriate assessment frameworks and management systems for establishing reasonable country of origin inquiry (“RCOI”) processes and due diligence. Furthermore, our responsible minerals sourcing program is tailored around the RMI’s Responsible Minerals Assurance Process (“RMAP”), which employs a risk-based approach to validate smelters, refiners, and processors with consideration to their mineral procurement processes.

Amphenol complies with the conflict minerals requirements set forth in Section 1502 of the Dodd-Frank Act. The term “conflict minerals” refers to columbite-tantalite, cassiterite, gold and wolframite, which may have originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country, for which there is concern that the exploitation and trade by armed groups is helping to finance conflict in the DRC region. Amphenol also adheres to the European Union Conflict Minerals Regulation, which addresses the same minerals as the Dodd-Frank Act, but expands the focus geographies to also include Conflict-Affected and High-Risk Areas, which the European Union Conflict Minerals Regulation defines as “areas in a state of armed conflict, fragile post-conflict areas, as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.”

Both regulations currently impose certain reporting and due diligence obligations on entities whose manufactured products contain tantalum, tin, tungsten, and gold (“3TGs”) which may have originated from conflict minerals. Amphenol has established a comprehensive management system to determine the origin of the conflict minerals and 3TGs used in our products. We report our findings, as required, on an annual basis.

Amphenol is committed to evaluating its responsible minerals program to include elements beyond 3TG. In addition to the requirements of the current regulations, Amphenol has broadened its scope of minerals to include cobalt, copper, graphite (natural), lithium, nickel, and mica, and will continue to assess additional minerals as relevant initiatives or drivers emerge. We intend to continue to annually engage our supply chain to verify conformance with our high standards as they evolve from time-to-time.

We take our role to protect human rights seriously and will continue to assess and mitigate risks within our minerals supply chain. We recognize that supply chain transparency and collaborative efforts within the industry are imperative for promoting responsible minerals sourcing with the goal of eradicating human rights violations associated with the extraction of certain minerals. The intent of this policy is to achieve responsible sourcing within our global supply chain and to ensure that certain minerals used in our products are sourced in an ethical manner that concurrently benefits the local communities from which they are extracted.



R. Adam Norwitt
President and CEO