

# Amphenol

## ANTI-HUMAN TRAFFICKING AND SLAVERY STATEMENT For Fiscal Year January 1, 2019 through December 31, 2019

### 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 supply materials to our supply chain.

The **California Transparency in Supply Chains Act of 2010** requires certain companies to disclose their efforts to eradicate human trafficking and slavery from their direct supply chains for tangible goods offered for sale. The **U.K. Modern Slavery Act of 2015** requires certain commercial organizations to prepare and publish a human trafficking and slavery statement for the financial year describing the steps, if any, the organization has taken during the financial year to ensure that human trafficking and slavery is not taking place in any of its supply chains and in any part of its own business.

This 2019 Anti-Human Trafficking and Slavery Statement reflects Amphenol's progress during 2019, covering Amphenol's January 1 – December 31 fiscal year, and ongoing efforts to combat and prevent human trafficking, slavery and forced, compulsory or involuntary labor in our supply chain. This Statement is intended to fulfill the requirements of both the California and UK acts specified above.

### 2. 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.

In our Code of Business Conduct and Ethics as well as our Responsible Labor Policy ("RLP"), Amphenol strictly prohibits human trafficking and slavery in all of our operations and in those of our subcontractors, suppliers and agents. To support Amphenol's supplier-related compliance efforts, in 2019, Amphenol implemented a [Supplier Code of Conduct](#) ("SCOC"). Amphenol's SCOC is built upon and incorporates 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. Amphenol's SCOC applies to companies that do business with Amphenol and requires that these suppliers and their employees comply with the SCOC in all aspects of their operations that relate to their business with Amphenol.

Our RLP 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 RLP 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 their native language that contains a description of terms and conditions of employment, and there shall be no substitution or change(s) allowed in the employment agreement unless these changes are made 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, such fees shall be repaid to the worker.

Our employees and suppliers are encouraged to report any concerns related to issues covered by the RLP and SCOC.

In the event of a violation of our SCOC, 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.

### **3. Due Diligence / Verification**

In late 2019, we commenced communication of our SCOC in five key languages to our supply chain and used a third-party data collection provider to assist with the identification and risk mitigation 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, which includes our right to audit suppliers and inspect their facilities. In 2020, we will assess our SCOC against the newly revised RBA Code of Conduct 7.0 and modify accordingly, if necessary, to ensure alignment. We will also continue to review and improve our efforts at minimizing the potential for human trafficking and slavery in our supply chain by evaluating supplier compliance with Amphenol's SCOC and conducting ongoing training and assessment regarding our SCOC.

### **4. Risk Assessment**

Utilizing supplier data from our SCOC outreach, Amphenol conducted a preliminary supply chain mapping exercise to identify at-risk geographies, based on the Global Slavery Index ("GSI") and U.S. Department of State Trafficking in Persons Report ("TIP"). Those Tier 1-Direct suppliers

located in medium or high risk geographies, as identified per the TIP, will be surveyed and assessed for risk of human trafficking and slavery using the Slavery & Trafficking Risk Template (“STRT”), version 2.0, which is an industry standard, open-source template available at [www.sraglobal.org](http://www.sraglobal.org).

Amphenol’s supply chain mapping and surveying, using the STRT, of Tier 1-Direct suppliers located in at-risk geographies will be conducted at least annually. Data from this exercise will provide metrics to allow us to understand the scope of any 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.

## **5. Accountability**

Amphenol maintains a robust internal 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.

Amphenol’s Code of Business Conduct and Ethics governs the legal and ethical aspects of employee behavior. Amphenol’s RLP sets forth our respect and support for human rights. The Code of Business Conduct and Ethics requires that employees abide by laws and regulations applicable to their work, including laws regarding workplace practices and safety. Through the Code of Business Conduct and Ethics, Amphenol seeks to promote honest and ethical conduct, deter wrongdoing, and support compliance with applicable laws and regulations. Annually, management employees are required to complete training regarding the Code of Business Conduct and Ethics and certify that they have read and abided by it.

Violations of the Code of Business Conduct and Ethics can result in disciplinary action, which may include termination. Suspected violations can be anonymously reported via a toll-free line, which is available 24 hours a day, as well as via email. Information about reporting is made available to all employees through the Code itself and via posters located at company sites around the world.

## **6. Training**

In 2019, Amphenol deployed training on human trafficking and slavery to all relevant employees and managers in each of our operations who have direct responsibility for supply chain management and for recruitment of new employees. We will continue to train 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.



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R. Adam Norwitt  
Chief Executive Officer and Director  
Amphenol Corporation