

# Responsible Sourcing Policy (Direct and Indirect)

This Policy applies to and binds all directors, managers and employees of the organization in any situation where they are involved in a sourcing process, whether as requesters or specifiers, purchasers or negotiators.

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## DOCUMENT CONTROL

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V1.0	12/02/22	M Foley/P Heine	Initial Document
V2.0	06/23/23	M Foley/P Heine	Updated with requirements of German Supply Chain Due Diligence Act

## Responsible Sourcing Policy

### Policy Statement

Avnet is committed to responsible business conduct in all procurement and sourcing activities in accordance with its core values. Avnet's suppliers and vendors are key business partners and essential to Avnet responsibly sourcing its products and services. Avnet selects its suppliers, manufacturers, and vendors, in part, based on their shared commitment to Avnet's core values and the principle and standards of responsible sourcing as outlined in this policy.

### Definitions

Supplier - a person or company that provides Avnet with a product or service.

Vendor - synonymous with Supplier.

Direct Procurement – the purchasing of good and services for a company's distribution or resale to external customers.

Indirect Procurement – the purchasing of goods and services for a company's internal consumption.

Manufacturer- a person or company that makes goods for sale.

Contractor – a third party person or company contracted by Avnet to perform services.

Subcontractor – a third party or company contracted by a Contractor to perform services on their behalf.

### Policy Details

Avnet expects its suppliers, manufacturers, vendors, contractors, subcontractors, and their respective agents to share Avnet's commitment to responsible sourcing, including the standards outlined in the Responsible Business Alliance (RBA) Code of Conduct and the following standards:

#### 1. General

- Compliance with all applicable and relevant laws and international standards, including data privacy, environmental, labor, occupational health and safety, anticorruption, import/export and other laws and international standards;

#### 2. Ethics

- Adhere to a company Business Ethics Policy or Code of Conduct;
- Non-participation in and non-toleration of bribery or other corruption (e.g. kickbacks, money laundering, fraud, etc.);
- Not giving or receiving gifts, gratuities, travel or expenses that are improper or illegal;
- Respect for the intellectual property rights of others;
- Refusal to engage in unfair business practices or other violations of antitrust laws;
- Reasonable efforts to avoid and mitigate counterfeiting;

### 3. Human Rights

- Non-use of forced labor or illegal child labor;
- Prohibition of slavery and human trafficking in operations and the supply chain;
- Maintenance of a safe and healthy work environment;
- Respectful treatment of individuals and nontolerance of unlawful discrimination based on race, color, sex (including pregnancy), marital status, political opinions, religion, age, disability, sexual orientation, social origin, national origin, or any other legally protected trait;
- Not engaging in, condoning, or tolerating harassment against or among employees;
- Adherence to legal requirements for working hours, wages, and overtime;
- Pay practices that meet or exceed local law requirements;
- Respect for the rights of employees to associate or not with any lawful labor group;
- Prohibition of the disregard of the right to form a lawful labor group;
- Prohibition of negative impacts on the environment (such as water pollution, soil change, air pollution, noise emission, excessive water consumption) being harmful to and affecting persons;
- Prohibition of unlawful eviction and land deprivation;
- Prohibition of hiring of security forces for the protection of a company's project where this leads to certain human rights violations due to a failure by the company to supervise or control the security forces;
- Reasonable efforts to identify the origin of conflict minerals used in products with the goal of avoidance of sourcing such minerals from mines in the Democratic Republic of Congo or adjoining countries;

### 4. Environmental

- Complies with all environmental laws, regulations and international standards where products are manufactured, imported/exported and/or sold, or where services are imported/exported and/or delivered such as but not limited to the prohibition on the production of mercury-added products, use of mercury and treatment of mercury waste, the

prohibition of production and use of chemicals under the Persistent Organic Pollutants Convention, applicable relevant laws and standards related to hazardous waste;

#### 5. Security

- Maintenance of a responsible supply chain security program as appropriate;

#### 6. Risk Management and Monitoring

- Maintenance of a responsible risk assessment and management program for its own operations and supply chain;
- Monitoring of the company's own compliance with these standards; and
- Engaging in a process of continual improvement of compliance programs related to these standards.

*Administration Roles and Responsibilities.* The Avnet Leadership Team is responsible for ensuring that the risks and opportunities for the business are considered and acted upon appropriately, and that Avnet's Supplier Management and Procurement Practices are suitable for our business.

*Governance.* Performance will be regularly reviewed and audited and reported to the competent (international) authorities if required. Performance progress will be routinely reported through our annual ESG sustainability report and based upon internationally accepted initiatives (GRI, SASB etc.).

*Review:* The Avnet Leadership Team demonstrates commitment to this policy assuring this policy is evaluated regularly by our Supplier Management and Procurement teams, reviewed for suitability, and approved by senior management for publication. It is available to all interested parties at Avnet.com.

For further information, please contact Senior VP of Supplier Management or VP of Procurement.