

Global Indirect Procurement Integrity Policy

1 Policy Statement

Avnet is committed to procure goods and services for internal consumption in an objective, fair, lawful, and ethical manner and based on Avnet's best interests.

2 Scope

This policy applies globally to Indirect Procurement and to all directors, officers, employees, contractors and agents of Avnet, Inc. and its subsidiaries and affiliates.

3 Policy Details

3.1 Avnet's is committed to lawfully and ethically procure goods and services based on objective criteria such as price, quality, timely delivery, and service. Avnet chooses suppliers that offer us the best price, value and contract terms while ensuring the fair treatment of those who bid for business from Avnet, Avnet's vendors, and Avnet's contractors.

3.2 Consistent with this Policy, the Global Indirect Procurement Team ("Indirect Procurement") is authorized to issue procedures and guidelines on the purchasing of goods and services for Avnet's internal consumption, i.e., indirect procurement / non-inventory purchases. All purchasing activities shall be conducted in accordance with any such procedures and guidelines issued by Indirect Procurement and approved by the Chief Financial Officer.

Such procedures and guidelines may address matters including, but not limited to,

- 3.2.1 the criteria and process for evaluating and selecting vendors,
- 3.2.2 bidding requirements,
- 3.2.3 requests for information, quotes, or pricing,
- 3.2.4 requirements for single or sole sourcing,
- 3.2.5 debarment or suspension of vendors, and
- 3.2.6 collaboration with the Legal Department, negotiating terms and conditions.

3.3 Any and all indirect purchasing activities utilizing or expecting to utilize the vendor's contract – instead of Avnet's terms and conditions or purchase order -- must go through the Indirect Procurement contract review, selection, negotiation, and approval process.

3.4 Generally, engagement of vendors requires a confidentiality agreement signed by such vendors. Avnet must also keep vendor proprietary and confidential information reasonably secure. Vendor information should not be used for any purpose other than that for which the vendor provided, or Avnet disclosed, and then only as needed to manage or fulfill contractual requirements. In no event should vendor information be used for personal interest or gain or be disclosed to any other third-party (without the fore knowledge & written consent of the vendor).

3.5 All indirect procurement activities must be conducted in accordance with Avnet policies including, but not limited to, Avnet's:

3.5.1 *Code of Conduct*, providing information about our standards of integrity and explaining some of our legal and ethical responsibilities.

3.5.2 *Global Anti-Corruption Policy*, providing standards and procedures that will help ensure that all employees, officers, directors, agents, and anyone acting on behalf of Avnet worldwide, comply with applicable laws against corruption and maintain Avnet's reputation for ethical business practices.

3.5.3 *Conflicts of Interest Policy*, requiring employees to act solely in the best interest of Avnet. There is a duty to avoid any actual or apparent conflicts of interest in strict accordance with the Conflicts of Interest Policy. Conflicts of Interest or the appearance of a conflict of interest must also be taken into account and avoided when considering whether to accept Gifts, Gratuities, Travel & Entertainment ("GGT&E") from a vendor. When in doubt, err on the side of caution.

3.5.4 *Antitrust Policy*, including its restrictions on reciprocal arrangements that are

prohibited. Avnet does not condition its purchase of an indirect procurement vendor's goods or services upon the vendor agreeing to purchase goods or services from Avnet in return. Doing so is unethical and may be unlawful.

3.5.5 *Export Compliance*, including its restrictions for compliance to Avnet's requirement to honor legally enforced embargoes and sanctions when exporting or re-exporting goods & services.

3.5.6 *Political Contributions and Activities policy*, detailing only who & where such contributions can be made.

3.5.7 *Responsibility and Authority Matrix* or *Delegation of Authority Matrix* regarding whom is authorized to approve specified spend limits.

3.5.8 *Global Information Security Policy*, for the protection of information, technology, and Avnet Assets.

3.5.9 *Cybersecurity Policy*, for the protection of Avnet and Vendors cybersecurity.

3.5.10 *Global Data Privacy Policy*, regarding Avnet's commitment to protecting the privacy & confidentiality of Personal Information/Data.

3.5.11 *Avnet's Indirect Procurement Policy*, regarding the correct procedure for purchasing, utilizing the P2P system(s) Ariba or Esker for the proper purchasing request & approval route.

3.5.12 *Avnet's RfP Process*, regarding the correct activities to follow when engaging in a vendor RfP process.

3.5.13 *Responsible Sourcing Policy*, regarding standards for the selection of Avnet's suppliers, vendors, manufacturers, and Avnet's expectation of commitment by these vendors, suppliers, manufacturers to these standards.

3.5.14 *Global Workplace Health & Safety Policy*, focusing on workplace health and safety and providing health and safety workplace practices that everyone working at Avnet should adhere to.

3.5.15 *Global Environmental Policy*, for minimizing the environmental impact of our activities, within our sphere of control, by embedding environmental considerations into our decision-making processes and operational activities.

3.6 These policies are all available on the Policy Hub of Avnet's intranet 'Compass'. If in doubt, please review in detail and then if further clarity is still required, please contact a member of the Ethics and Compliance team who will help resolve your queries.

- 3.7 Any activities that could be construed by another party as being in contravention of the above policies should be logged and immediately notified to the appropriate personnel, be that the immediate line manager, department head, a member of the Ethics and Compliance team, a Code of Conduct Advisor (CCA) via the intranet (Compass) or the [Ethics Alertline](#). Examples of contravening actions may include:
- 3.7.1 Unjustifiable disqualification, suspension, or disbarment of a vendor
 - 3.7.2 Cancellation or rescission of the procurement or contract
 - 3.7.3 Disclosure of confidential or proprietary information
 - 3.7.4 Disclosure of ranking position, competitor bids or proposals
 - 3.7.5 Disclosure of ranking panel members details
 - 3.7.6 Initiation of adverse personnel actions
 - 3.7.7 Solicitation of employment initiated by Avnet employees during or immediately upon award of a contract
 - 3.7.8 Accepting inappropriate compensation from a bidder, vendor, or contractor
- 3.8 Where an individual believes or knows there is a possible **third-party conflict of interest** during a procurement process, they should in the first instance raise & discuss their concerns with the immediate line manager, HR, a member of the Ethics and Compliance team or contact a CCA. Alternatively, the concern can also be raised anonymously utilizing Avnet’s on-line [Ethics Alertline](#) reporting system.
- 3.9 Where an individual believes or knows there is a possible **personal conflict of interests** during a procurement process, they should in the first instance raise & discuss their concerns with the immediate line manager, HR, a member of the Ethics and Compliance team or contact a CCA. Alternatively, the concern can also be raised anonymously utilizing Avnet’s on-line [Ethics Alertline](#) reporting system. If a conflict is identified, the individual should recuse themselves from the procurement process at the earliest opportunity.
- 3.10 *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 Indirect Procurement Practices are suitable for our business.
- 3.11 *Governance.* Performance will be regularly reviewed, audited, and reported to (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.).

- 3.12 *Review:* The Avnet Leadership Team demonstrates commitment to this policy, assuring this policy is evaluated regularly by our Indirect Procurement team, 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 the VP of Procurement.