

Amphenol IPC North America Code of Conduct

1. PURPOSE

Amphenol IPC is committed to ethical conduct, integrity and compliance throughout our operations worldwide.

Amphenol IPC upholds the principles of treating every worker with utmost respect and dignity, prioritizing the provision of secure working environments, and upholding ethical standards in all our operations with a strong emphasis on environmental responsibility. We hold our suppliers, as well as their suppliers, accountable for embracing the following social, environmental, and ethical responsibilities in our operations and supply chain.

The Code of Conduct (CoC) is rooted in the RBA Code of Conduct, accessible at <http://www.responsiblebusiness.org/standards/code-of-conduct/>. Moreover, it embodies further directives from both the Amphenol Corporation Code of Business Conduct and Ethics, as well as the Amphenol IPC requirements.

This CoC may have provisions superseded by local laws, regulations or legal obligations. Amphenol IPC wishes to establish and maintain relationships with Suppliers who demonstrate a firm commitment to the **Amphenol IPC Supplier Code of Conduct (SCoC)**, this SCoC and reserves the right to terminate any contract or agreement where a Supplier is determined by Amphenol IPC to have violated any portion of the SCoC.

2. SCOPE

Amphenol IPC ensure conformance to the CoC in all business dealings. Amphenol IPC sub-tier supplier, subcontractor or temporary labor agency shall ensure their conformity to the **Amphenol IPC Supplier Code of Conduct (SCoC)**.

3. DEFINITIONS

3.1. Bonded Labor

Practice in which workers are forced to provide labor to an employer, for a set period with little or no pay, often as a way of paying a debt. Also known as debt bondage.

3.2. Child Labor

Any person under the age for completing compulsory education, under the minimum age for employment in the country, or under the age of 15, whichever is higher.

3.3. Corporal Punishment

Discipline through use of physical punishment intended to cause harm or pain.

3.4. Disciplinary Wage Reduction

Wage deductions, fines, or account withdrawals used as a disciplinary measure. A deduction from wages equal to time not worked is not considered a disciplinary wage deduction.

3.5. Emergency or Unusual Situations

Unpredictable events or situations, which cannot be planned for or foreseen, that result in overtime exceeding legal or RBA specified limits.

3.6. Forced Labor

Work or service that a person has not offered to do voluntarily but is made to do under the threat of retaliation, punishment or debt repayment.

3.7. Indentured Labor

A worker under contract to work for a specified time-period for another person, often without wages, but instead, in exchange for accommodation, food, other essentials and/or free passage to a new country.

3.8. Prison Labor

Forcing prisoners to work for profit-making enterprises, either directly or through the contracting of prison labor.

3.9. Trafficking of Humans

The action or practice of illegally transporting people from one country or area to another, typically for the purposes of forced labor or sexual exploitation.

3.10. Whistleblower

Any person who informs on a person or organization engaged in improper conduct or an illicit activity.

3.11. Young Worker

Any person older than the minimum legal age for employment, but younger than 18 years of age. Also known as juvenile workers.

4. LABOR

Amphenol IPC firmly stands by its dedication to safeguarding the human rights of all workers and ensuring they are treated with utmost dignity and respect. This commitment extends to workers of every category, including temporary, migrant, student, contract, direct employee, and any other classification.

4.1. Freely Chosen Employment

Amphenol IPC shall not use 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. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to 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. Amphenol IPC do 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 Amphenol IPC 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.

4.2. Young Workers and Student Interns.

Amphenol IPC prohibited from employing child labor. They are encouraged to utilize legitimate workplace learning programs that adhere to all applicable laws and regulations. Young workers under the age of 18 shall not be assigned tasks that could endanger their health or safety, including night shifts and overtime. Suppliers are responsible for effectively managing student workers, which involves maintaining accurate student records, conducting thorough due diligence on educational partners, and safeguarding students' rights in accordance with relevant laws and regulations. Adequate support and training should be provided to all student workers. In the absence of local legislation, the wage rate for student workers, interns, and apprentices must be equal to or greater than the wage rate for other entry-level workers performing similar tasks.

4.3. Working Hours

Unless there are emergency or exceptional circumstances, Amphenol IPC workers who are paid hourly are required to work within the limits specified by local law. This includes adhering to the maximum working hours set by local regulations. Additionally, workers must be provided with minimum breaks and rest periods as mandated by the applicable local law. It is also mandatory to grant workers at least one day off every seven days.

4.4. Wages and Benefits

Amphenol IPC ensure that compensation paid to workers fully complies with all applicable wage laws, including those related to minimum wages, overtime hours, and legally mandated benefits. In accordance with local laws, workers should receive compensation for overtime at rates higher than their regular hourly rates. It is strictly prohibited to implement disciplinary wage reductions. Additionally, for each pay period, workers must receive a timely and comprehensible wage statement that contains adequate information to verify the accuracy of their compensation for the work performed. Furthermore, the utilization of temporary, dispatch, and outsourced labor must adhere to the limits set by local law.

4.5. Humane Treatment and Non-Discrimination and Inclusion

Amphenol IPC ensure that workers are not subjected to any form of inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse. They are also prohibited from threatening workers with such treatment. Clear and communicated disciplinary policies and procedures should be in place to support these requirements.

Regarding non-discrimination, Amphenol IPC maintain a workforce that is free from harassment and unlawful discrimination. Amphenol IPC prohibit engaging in discriminatory practices based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion,

political affiliation, union membership, covered veteran status, protected genetic information, art on the skin, or marital status in their hiring and employment practices, such as wages, promotions, rewards, and access to training.

Reasonable accommodations for religious practices should be provided to workers. Additionally, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory manner.

4.6. Freedom of Association and Collective Bargaining

In accordance with local law, Amphenol IPC fully respect and recognize the fundamental right of all workers to form and freely join trade unions of their own choosing. Furthermore, suppliers shall uphold the right of workers to engage in collective bargaining, which entails the ability to negotiate and discuss working conditions, wages, benefits, and other terms of employment through their chosen representatives.

Collective bargaining serves as a crucial mechanism for empowering workers and ensuring their voices are heard in matters that directly impact their well-being. It promotes a fair and equitable working environment by enabling workers to collectively address concerns and advocate for their rights. Suppliers must acknowledge and honor this right, providing a conducive atmosphere for constructive dialogue and negotiations between workers or their representatives and management.

Additionally, Amphenol IPC foster an environment where workers and their representatives feel safe and comfortable openly communicating their ideas, concerns, and grievances regarding working conditions and management practices. This includes guaranteeing that workers will not face any form of discrimination, reprisal, intimidation, or harassment as a result of exercising their right to participate in collective bargaining or engaging in open discussions with management.

By upholding the principles of collective bargaining and ensuring open communication channels, suppliers contribute to a harmonious and respectful workplace, where the rights and well-being of workers are protected and prioritized.

5. HEALTH and SAFETY

Amphenol IPC acknowledges that a safe and healthy work environment not only reduces work-related injuries and illnesses but also improves product and service quality, production consistency, and worker retention and morale. Additionally, Amphenol IPC recognizes the significance of ongoing worker input and education in identifying and addressing health and safety concerns within the workplace. Therefore, suppliers are required to comply with relevant health and safety regulations, consistently enhance their health and safety performance, and integrate the specified health and safety management requirements into their business processes to ensure a healthy and safe work environment for workers.

5.1. Occupational Safety

The potential for worker exposure to safety hazards, such as chemical, electrical, and other energy sources, fire, vehicles, and fall hazards, will be identified, assessed, and controlled through appropriate design, engineering, and administrative controls. This includes the implementation of preventative maintenance and safe work procedures, including lockout/tagout, as well as ongoing safety training. In cases where these measures are insufficient to adequately control hazards, workers will be equipped with suitable and well-

maintained personal protective equipment. Additionally, they will receive training on the risks associated with these hazards.

Furthermore, pregnant women and nursing mothers will be removed from high-hazard working conditions, and efforts will be made to eliminate or reduce any workplace health and safety risks associated with their specific work assignments. Reasonable accommodations will be provided to nursing mothers.

Amphenol IPC complies with all relevant safety and health laws and regulations. Amphenol IPC is responsible for identifying, evaluating, and controlling worker exposure to safety and health hazards, including chemical, biological, physical, and ergonomic stressors, through appropriate design, engineering controls, maintenance, safe work procedures, and ongoing health and safety guidance. When these measures are insufficient, Amphenol IPC ensures that workers are protected with suitable personal protective equipment (PPE) and are provided with information about the risks associated with these hazards.

In addition, Amphenol IPC has established procedures to prevent, manage, track, and report occupational injuries and illnesses. This includes promoting worker reporting, appropriately classifying and recording cases, providing necessary medical treatment, conducting thorough investigations, implementing corrective actions, and facilitating workers' return to work.

5.2. Emergency Preparedness

Amphenol IPC has identified and assessed potential emergency situations and incidents, with the goal of minimizing their impact by putting in place emergency plans and response protocols. These plans and procedures cover a range of areas, such as reporting emergencies, notifying employees, outlining evacuation protocols, providing worker training and conducting drills, ensuring the availability of appropriate fire detection and suppression equipment, maintaining unobstructed exit routes, ensuring adequate exit facilities, and devising recovery strategies. The central objective of these plans and procedures is to mitigate risks to human life, the environment, and property.

Furthermore, Amphenol IPC has also identified potential emergencies and made preparations accordingly. They have implemented their own emergency plans and have offered guidance to employees on how to respond during emergencies. This encompasses reporting procedures for emergencies, notifying workers, conducting evacuation drills, having the necessary fire detection and suppression equipment in place, ensuring proper exit facilities, and devising recovery plans

5.3. Occupational Injury and Illness

Amphenol IPC established procedures to prevent, manage, track, and report occupational injuries and illnesses. These procedures include provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, implement corrective actions to eliminate their causes, and facilitate the return of workers to work

5.4. Industrial Hygiene

Amphenol IPC identify, evaluate and control exposure to chemical, biological and physical agents according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and trained on the use of appropriate, well-maintained, personal protective equipment. Protective programs include training about the risks associated with these hazards.

5.5 Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

5.6. Machine Safeguarding

Production and other machinery are evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

5.7. Sanitation, Food and Housing

Amphenol IPC ensures that workers have immediate access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. In the event of Amphenol IPC offer residential facilities to workers, these facilities are clean, safe, and equipped with sufficient personal space. They have proper entry and exit privileges, emergency exits, heating, ventilation, and hot water for bathing and showering.

5.7. Health and Safety Communication

Amphenol IPC provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards those workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information are clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers are encouraged to raise safety concerns.

6. ENVIRONMENTAL

Amphenol IPC recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

6.1. Environmental Permits and Reporting

All required environmental permits, approvals, certifications and registrations are to be obtained, maintained and kept current at Amphenol IPC and reporting requirements are to be followed.

6.2. Pollution Prevention and Resource Reduction

The use of resources and generation of waste of all types, including air, water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, reuse or recycling

6.3. Hazardous Substances

Amphenol IPC identify and manage chemicals and other materials that pose a hazard to the environment, ensuring their safe handling, use, storage, and disposal. Amphenol IPC also identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from their operations. Additionally, Amphenol IPC restrict the use of specific substances, including providing appropriate labeling for recycling or disposal. It is essential to identify, label, and manage chemicals and other materials that pose a hazard to humans or the environment, guaranteeing their safe handling, movement, storage, use, recycling, reuse, or disposal.

6.4. Solid Waste

Amphenol IPC implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous and non-hazardous waste.

6.5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated in accordance with permit conditions as required prior to discharge. Amphenol IPC conduct routine monitoring of the performance of its air emission control systems.

6.6. Product Compliance and Material Restrictions

Amphenol IPC adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

6.7. Water Management

Amphenol IPC implement a systematic approach to responsibly manage water withdrawal and discharges in accordance with applicable regulations and permit conditions and promote water conservation.

6.8. Energy Management

Amphenol IPC implement a systematic approach to responsibly manage energy consumption and improve energy efficiency in effort to reduce greenhouse gas (GHG) emissions.

7. ETHICS and COMPLIANCE

Amphenol IPC is committed to and uphold the highest standards of ethical conduct to promote honesty and integrity in all their business dealings.

7.1. Business Integrity

Amphenol IPC uphold the highest standards of integrity in all aspects. Amphenol IPC avoid any conflicts of interest, real or perceived, and immediately disclose any known family or close personal relationships with our employees who have influence over their engagements with us. If suppliers choose to extend business courtesies to our employees, they should do so rarely and ensure that the value of such courtesies remains moderate. Suppliers should accurately document their business dealings in their books and records. Amphenol IPC employees are strictly prohibited from offering or accepting any form of bribery, corruption,

extortion, or embezzlement, both directly and indirectly. Amphenol IPC establish robust monitoring and enforcement procedures to ensure compliance with anti-corruption laws. Amphenol IPC maintain a zero-tolerance policy against all forms of bribery, corruption, extortion, and embezzlement in their operations.

7.2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage with Amphenol IPC are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures are implemented to ensure compliance with anti-corruption laws.

7.3. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Amphenol IPC business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

Falsification of records or misrepresentation of conditions or practices in Amphenol IPC operations are unacceptable.

7.4. Intellectual Property

Amphenol IPC respect intellectual property rights; transfer of technology and know-how is done in a manner that protects intellectual property rights; and, customer and supplier information is safeguarded.

7.5. Fair Business, Advertising & Competition

Amphenol IPC is upheld standards of fair business, advertising and competition.

7.6. Protection of Identity and Non-Retaliation

Amphenol IPC have programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers are to be maintained, unless prohibited by law. Amphenol IPC have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

7.7. Responsible Sourcing of Minerals

Amphenol IPC has a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Amphenol IPC exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request. Amphenol IPC provide the most current version of their Conflict Minerals Reporting Template (CMRT) within 30 days of request.

7.8. Privacy

Amphenol IPC is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Amphenol IPC comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

8. MANAGEMENT SYSTEMS

Amphenol IPC establish a management system whose scope is related to the content of this Code. The management system is designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Amphenol IPC operations and products; (b) conformance with this CoC; and (c) identification and mitigation of operational risks related to this CoC. It should also facilitate continual improvement.

8.1. Company Commitment

A corporate social and environmental responsibility policy statement affirming Amphenol IPC commitment to compliance and continual improvement, endorsed by executive management and posted at the facility in the local language.

8.2. Management Accountability & Responsibility

Amphenol IPC clearly identify the senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management review the status of the management system on a regular basis.

8.3. Legal and Customer Requirements

Amphenol IPC have a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this CoC.

8.4. Risk Assessment and Risk Management

Amphenol IPC have a process to identify the legal compliance, regarding environmental, health and safety (EHS), labor and ethics risks associated with Amphenol IPC operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

8.5. Improvement Objectives

Amphenol IPC have a written performance objectives, targets and implementation plans to improve the social and environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.

8.6. Training

Amphenol IPC have programs for training managers and workers to implement policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

8.7. Communication

Amphenol IPC have a process for communicating clear and accurate information about policies, practices, expectations and performance to workers, suppliers and customers.

8.8. Worker Feedback, Participation & Grievance

Amphenol IPC have processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this CoC and to foster continuous improvement.

8.9. Audits and Assessments

Amphenol IPC have periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the CoC and customer contractual requirements related to social and environmental responsibility.

8.10. Corrective Action Process

Amphenol IPC have a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

8.11. Documentation & Records

Amphenol IPC create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

8.12. Supplier Responsibility

Amphenol IPC have a process to communicate Amphenol IPC Supplier Code of Conduct (SCoC) requirements to suppliers and to monitor supplier compliance to the SCoC.

9.0 Anti-Trust

Amphenol IPC works hard to win business and provide outstanding service. However, we do not allow any action by any employee of the Company or any agreement or understanding that in any way illegally “restrains trade” i.e., which limits free competition. This includes any understanding or agreement with any of our competitors to fix or control prices, terms of sale, costs, profits, etc. There are potential fines and jail sentences for people who violate these laws. If you have any questions as to whether any action or proposed action violates or will violate any trade regulations or in any way restricts fair competition, please contact the Amphenol Legal Department.

10. REPORTING MECHANISM

If Amphenol IPC employee wishes to report questionable behavior or a possible violation of the Code of Conduct, you are encouraged to work with your primary Amphenol IPC contact in resolving your concern. If that is not possible or appropriate, please contact Amphenol IPC through any of the following methods:

Phone: +1(607)786-4221

Email: Nate.Toner@amphenol-IPC.com

Mail:

Nathan Toner

22 Valley Street
Endicott, NY, 13760 USA

Amphenol IPC will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this CoC.

Nathan Toner

Director of Quality and EH&S