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 provide materials to our supply chain. This statement sets out the steps Amphenol has taken to address the risks of human trafficking and slavery in 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 publish a human trafficking and slavery statement 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 Anti-Human Trafficking and Slavery Statement reflects Amphenol’s progress during 2020, 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 2020, Amphenol issued its Global Human Rights Policy, which reflects our global commitment to human rights and the integration of this commitment into our operations and supply chains. This policy unites our core policies related to human rights worldwide and reflects our belief in the principles stated in the UN Guiding Principles on Business and Human Rights.

In our Code of Business Conduct and Ethics (“COBCE”) as well as our Responsible Labor Policy (“RLP”), Amphenol strictly prohibits human trafficking and slavery. To support Amphenol’s supplier-related compliance efforts, Amphenol also has a Supplier Code of Conduct (“SCOC”) and in 2020, developed a Supplier Responsible Labor Policy (“SRLP”). Amphenol’s SCOC and SRLP are built upon and incorporate 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. Our SCOC and
SRLP require that our suppliers and their employees comply with the SCOC and SRLP in all aspects of their operations that relate to their business with Amphenol.

Our SRLP 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 SRLP 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 a language that the worker understands. The agreement must describe the terms and conditions of employment, and no changes may be made to the employment agreement, except where necessary 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, the fees shall be repaid to the workers.

Our suppliers are encouraged to report any concerns related to issues covered by the SRLP and SCOC. In the event of a violation of our SCOC or SRLP, 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

Amphenol communicates its SCOC and SRLP in five key languages to our supply chain and uses 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 and SRLP, which includes our right to assess suppliers and inspect their facilities. We will continue to assess our SCOC and SRLP against any updates to the RBA Code of Conduct and where practicable, modify to ensure alignment.

4. Risk Assessment

In 2020 Amphenol identified its suppliers located in 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 were surveyed and assessed for risk of human trafficking and slavery using the Slavery & Trafficking Risk Template (“STRT”) which is an industry standard, open-source template available at www.sraglobal.org. Tier 1
Direct suppliers located in low risk geographies were required to complete a detailed questionnaire issued through our supplier engagement portal.

Amphenol’s supply chain mapping and surveying will continue to be conducted annually. Data from this exercise will provide metrics to allow us to understand the scope of any potential 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 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.

Internal accountability standards help ensure compliance with Amphenol’s policies. Annually, management employees are required to complete training and certify compliance with the COBCE. Amphenol’s RLP sets forth our respect and support for human rights, and our SCOC and SRLP apply the same concepts to our suppliers. Supplier accountability regarding risk of human trafficking and slavery is assessed through our above-mentioned risk assessment program.

Suspected violations can be anonymously reported by phone or email. These reporting mechanisms are available both to employees and external parties. Violations of any of these policies can result in corrective action, up to and including termination.

6. Training

Amphenol continues to train key employees on human trafficking and slavery. All relevant employees and managers in each of our operations who have direct responsibility for supply chain management and for recruitment of new employees have received this training. We will continue to train new employees and will evaluate on-going training annually.

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.

R. Adam Norwitt
Chief Executive Officer and Director
Amphenol Corporation