

# Amphenol Corporation

## Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9

Amphenol Corporation (Amphenol) is committed to treating everyone in our business and supply chains with dignity and respect. We take seriously our role in combatting forced labor and child labor 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 report sets out the steps Amphenol has taken to address the risks of forced labor and child labor in our supply chain as required by the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9.

This report is made for fiscal year 2023, and addresses Amphenol and its identified legal entities<sup>1</sup> ongoing efforts to combat and prevent all forms of forced labor and child labor in our supply chain and in our operations.

### a) Structure, Activities, and Supply Chain

Amphenol is one of the world's largest providers of high-technology interconnect, sensor, and antenna solutions. Our products *Enable the Electronics Revolution* across virtually all end markets, including Automotive, Broadband Communications, Commercial Aerospace, Industrial, Information Technology and Data Communications, Military, Mobile Devices and Mobile Networks. Amphenol aligns its businesses into three business segments: Harsh Environment Solutions, Communications Solutions, and Interconnect and Sensor Systems. A list of those businesses represented by this report is attached hereto as Attachment 1.<sup>2</sup>

We are a global company, with approximately 280 manufacturing facilities in approximately 40 countries and sales worldwide. Amphenol designs, manufactures, and assembles its products at facilities in the Americas, Europe, Asia, Australia, and Africa and sells its products through its own global sales force, independent representatives, and a global network of electronics distributors. Our principal executive offices are located at 358 Hall Avenue, Wallingford, Connecticut, 06492. Amphenol has approximately 95,000 employees worldwide.

Our businesses with locations in Canada operate in the military and aerospace, interconnect systems, and high-power industrial technology industries. Activities that occur in Canada include production, manufacturing, and sale of goods, as well as the import of goods produced outside Canada in support of the manufacturing process.

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<sup>1, 2</sup> Legal entities are identified herein for the purpose of addressing the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9 (the "Act") as Amphenol understands them. Legal entities are not identified for the purpose of establishing obligations or responsibility under the regulations of the Canada Revenue Agency (CRA).

Our global supply chain consists of more than 17,000 Tier 1 Direct suppliers in almost 60 countries. Amphenol defines its Tier 1 Direct suppliers as those who provide raw materials and goods for production and with which we have direct transactional business. A list of our Tier 1 Direct supplier geographies is available in Appendix E of our annual [Sustainability Report](#).

## **b) Policies and Due Diligence Processes**

Amphenol maintains the same Environmental, Social, and Governance (“ESG”) policies, procedures, assessments, and training programs for each of its affiliated companies. Led by a team of ESG professionals, Amphenol provides operational support and oversight to each of its affiliates for the purposes of forced labor and child labor risk assessment and accountability. We work with each of our entities on a continuous basis throughout the year.

Amphenol has several policies that reflect our commitment to eradicate human trafficking and slavery in our operations and supply chain. Amphenol’s [Global Human Rights Policy](#) reflects our global commitment to human rights and the integration of our commitment into our operations and supply chains. Our Global Human Rights Policy unites our core policies related to human rights 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 has also adopted a [Supplier Code of Conduct](#) (“SCOC”) and [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. In 2023 we established a goal to enhance ESG elements in existing supplier auditing programs and conduct audits for suppliers identified as high risk based on our internal assessment.

Our SRLP and SCOC expressly prohibit the use of child, 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.

Amphenol communicates its SCOC and SRLP in eight key languages to our supply chain and uses a third-party data collection provider to assist with the identification and risk profiling of any forced labor and child labor 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. Amphenol continues to update our SCOC and SRLP to align with the RBA Code of Conduct and assess our SCOC and SRLP against any new updates to the RBA Code of Conduct and emerging regulations.

Additionally, Amphenol maintains a [Responsible Minerals Policy](#) ("RMP") based on RMI's Responsible Minerals Assurance Process, demonstrating our commitment to responsible mineral sourcing. Our program employs a risk-based approach to validate smelters and refiners based on their mineral procurement processes. We are mindful of the potential human rights abuses associated with mineral sourcing and remain diligent to ensure our sourcing of minerals does not perpetuate or contribute to such abuses. Amphenol regularly evaluates its responsible minerals program to reduce risks associated with mineral sourcing.

### **c) Forced Labor and Child Labor Risks**

In 2023, the scope of Amphenol's supplier risk assessment was expanded to include all Tier 1 Direct suppliers. Amphenol utilized The Bureau of International Labor Affairs (ILAB) [List of Goods Produced by Child Labor or Forced Labor](#), which comprises 159 goods from 78 countries and areas, to conduct a risk screening of its suppliers. We discovered that the types of goods we source from specific countries / areas may potentially pose forced and child labor risks. All Tier 1 Direct suppliers were issued a risk assessment questionnaire aligned with the [Slavery & Trafficking Risk Template \(STRT\) v3.1](#). Through these assessments, we were able to mitigate potential risks for forced labor and child labor within our supply chain by appointing local representatives to manage human rights risks within the supply chain, conducting training for suppliers on these topics, educating local representatives on how to engage effectively with suppliers on preventative measures, and bolstering grievance channels.

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 potential forced labor and child labor issues in our supply chain and inform remediation decisions of any incidents of trafficked or forced labor in our supply chain.

#### **d) Remediation Measures**

To date, Amphenol has not identified specific instances of the use of forced labor and child labor in our supply chain. However, Amphenol has taken remediation measures to address the potential use of forced labor and child labor in its supply chain including taking actions to prevent forced labor and child labor from occurring and establishing reporting mechanisms for suspected instances of forced labor and child labor.

Amphenol maintains a robust compliance program intended to ensure a culture of ethics and compliance among Amphenol's workforce. This program includes compliance training, regular communications to employees, and multiple means of reporting concerns. Violations of Amphenol's compliance program can result in disciplinary action, up to and including termination of employment. Amphenol also maintains strict standards for its supply chain which include express prohibition of the use of forced labor and child labor through the SLRP and SCOC. Our suppliers are encouraged to report any concerns related to issues covered by the SRLP and SCOC including the use of forced labor and child labor. 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.

Amphenol has multiple established mechanisms for reporting suspected instances of forced labor and child labor including phone and email reporting. In 2023 we bolstered our third-party whistleblower reporting mechanisms by establishing Amphenol Integrity Line, an anonymous web-based reporting tool where issues including those related to forced labor and child labor can be reported. These reporting mechanisms are available both to internal and external stakeholders. Reports received through these mechanisms are investigated and actioned in accordance with Amphenol policies and procedures.

#### **e) Remediation of Loss of Income**

To date, Amphenol has not identified circumstances which resulted in the loss of income to families that resulted from measures it has taken to eliminate the use of forced labor and child labor in its supply chain. Amphenol will continue to monitor its impact in this area.

#### **f) Training**

Amphenol continues to train key employees, who have direct responsibility for supply chain management or for recruitment of new employees, regarding forced labor and child labor. This training includes topics such as identification of human trafficking warning signs and prevention of human trafficking within our organization and in our supply chain as well as direction to reporting mechanisms. Amphenol also requires key employees to complete yearly Ethics and Code of Conduct training. All Amphenol employees are bound by Amphenol's COBCE. Additionally, Amphenol launched a company-wide training in 2023 for our procurement community focused on enhancing ESG elements in supplier auditing and

conducting risk assessments for suppliers beyond Tier 1. We will continue to train relevant new employees and will evaluate on-going training annually.

In 2023 we conducted training for our Tier 1 Direct suppliers on topics such as Social and Governance, Child Labor, and Human Trafficking and Slavery. This training delivered Amphenol's expectations to suppliers and will be updated annually for new and existing suppliers. We plan to continue these efforts into 2024 as new topics emerge from global regulations.

### **g) Assessment of Effectiveness**

For Amphenol, effectively managing forced labor and child labor risks means we must be able to facilitate positive change through our processes and activities. This starts with a strong foundational program in which continuous improvement is a core principle. Additionally, our programs are evolutionary and flexible to allow us to adapt to new regulations or localized or global events requiring our attention. We further believe in the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, Universal Declaration of Human Rights, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and consider these principles when assessing our programs' effectiveness.

Our geographical-based risk assessment methodology has allowed for a meaningful focus on those regions where the greatest risk for forced labor and child labor may be present. This approach, coupled with increased multi-lingual supplier communications, has helped us increase our overall supply chain assessment response rate year over year.

Amphenol tracks relevant performance indicators including employees for training, the rate of completion of employee training, supply chain assessment responses, and the number of cases reported and solved through grievance mechanism channels. Amphenol bolsters supplier audits to include new and enhanced ESG elements. Amphenol actively monitors regulatory changes and guidance related to combating forced labor and child labor. Amphenol will continue to consider these factors when assessing its forced labor and child labor program policies and procedures.

### **Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. I attest that I have the authority to bind Amphenol Corporation.

Full name: R. Adam Norwitt  
Title: Chief Executive Officer and Director  
Date: May 1, 2024  
Signature:

A handwritten signature in blue ink, consisting of stylized, cursive letters, is positioned above a solid black horizontal line. The signature appears to be 'R. Adam Norwitt'.

## Attachment A

Amphenol (Changzhou) Advanced Connector Co., Ltd.  
Amphenol (Changzhou) Connector Systems Co. Ltd.  
Amphenol (Changzhou) Electronics Co., Ltd.  
Amphenol (Ningde) Electronics Co. Ltd.  
Amphenol (Tianjin) Electronics Co., Ltd.  
Amphenol (Xiamen) High Speed Cable Co. LTD  
Amphenol Adronics, Inc.  
Amphenol Air LB GmbH  
Amphenol Air LB SAS  
Amphenol Airwave (HaiYan) Communication Electronics Co. Ltd  
Amphenol Alden Products Company  
Amphenol Aorora Technology (Huizhou) Co., Ltd.  
Amphenol Assemble Tech (Xiamen) Co., Ltd.  
Amphenol Automotive Connection Systems (Changzhou) Co. Ltd  
Amphenol Benelux B.V.  
Amphenol Borisch Technologies, Inc.  
Amphenol Canada Acquisiton Corp  
Amphenol Canada Corp.  
Amphenol Commercial & Industrial UK, Limited  
Amphenol Commercial Products (Chengdu) Co. Ltd.  
Amphenol Communication Electronics Vietnam Co.,LTD  
Amphenol Corporation  
Amphenol DC Electronics Inc.  
Amphenol East Asia Electronic Technology (Shenzhen) Co. Ltd.  
Amphenol East Asia Limited  
Amphenol France SAS  
Amphenol Germany GmbH  
Amphenol Goldstar Electronic Systems (Baicheng) Co. Ltd.  
Amphenol Interconnect India Private Limited  
Amphenol Interconnect Products Corporation  
Amphenol International Ltd.  
Amphenol Japan Ltd.  
Amphenol Jet (Haiyan) Interconnect Technology Co., Ltd  
Amphenol Limited  
Amphenol LTW Technology Co. Ltd.  
Amphenol Malaysia Sdn. Bhd.  
Amphenol MCP Korea Limited  
Amphenol Mobile Connector Solutions (Changzhou) Co., LTD  
Amphenol Netherlands Holdings 1 B.V.  
Amphenol Omniconnect India Private Limited  
Amphenol Optimize Manufacturing Co.  
Amphenol PCD (Shenzhen) Co., Ltd.  
Amphenol PCD, Inc.

Amphenol Phoenix Anji Telecom Parts Co., LTD  
Amphenol Printed Circuits, Inc.  
Amphenol RF Asia Limited  
Amphenol Sensing Korea Company Ltd  
Amphenol Sincere Industrial Product  
Amphenol Socapex S.A.S.  
Amphenol Sunpool (Liaoning) Automotive Electronics Co., Ltd.  
Amphenol TCS (Malaysia) Sdn. Bhd.  
Amphenol Technical Products International Co.  
Amphenol Technologies Holding GmbH  
Amphenol Technology (Shenzhen) Co. Ltd.  
Amphenol Technology (Zhuhai) Co., Ltd.  
Amphenol Tel-Ad Ltd.  
Amphenol TFC do Brasil Ltda.  
Amphenol TFC MDE Participacoes Ltda.  
Amphenol Thermometrics, Inc.  
Amphenol Times Microwave Electronics (Shanghai) Li  
Amphenol US Hold Co Inc.  
Amphenol Vietnam Technology  
Amphenol-Kai Jack (Shenzhen) Inc.  
Amphenol-TFC (Changzhou) Communications Equipment  
Amphenol-Tuchel-Electronics GmbH  
Amphenol-Tuchel-Industrial GmbH  
Anytek Electronic Techn. (Shen Zhen) Co., Ltd.  
APH Technology Macedonia  
APH Tecvox LLC  
ARCAS Automotive Group S.a.r.l.  
Auxel FTG  
Auxel S.A.  
Bernd Richter GmbH  
CASCO Automotive (Suzhou) Co. Ltd.  
CASCO Automotive Group, Inc.  
Casco Automotive Singapore Pte LTD  
CASCO Holding LTD, HK  
CASCO Products Corporation  
Cemm Thome SK, spol s.r.o.  
Charles Industries, LLC  
CMR GROUP  
CONEC Elektronische Bauelemente GmbH  
Connor Manufacturing (Su zhou) Co. Ltd  
Connor Manufacturing Services, Inc  
CTI Industries Inc  
Custom Cable  
El-Cab  
EXA Thermometrics India Private Limited



FCI Asia Pte Ltd  
FCI Conn. Malaysia Sdn Bhd  
FCI Connectors Dongguan Ltd  
FCI Deutschland GmbH  
FCI Hortogenbosch BV  
FCI Japan K.K.  
FCI Nantong Ltd  
FCI OEN Connectors Limited  
FCI PRC LTD  
FCI Taiwan Ltd  
FCI USA LLC  
FCI's Hertogenbosch BV  
FEP Fahrzeugelektrik Pirna GmbH & Co. KG  
Fiber Systems International, Inc.  
Filec SAS  
General Assembly Corporation  
Guangzhou Amphenol Electronics Co. Ltd.  
Guangzhou Amphenol Electronics Co., LTD. Tongzhou Branch  
Guangzhou Amphenol Sincere Flex Circuits Co., Ltd.  
Halo Technology Ltd.  
Hangzhou Amphenol Phoenix Telecom Parts Co., Ltd.  
Hangzhou APH JET Interconnect Technology Co., Ltd.  
i2s Intelligente Sensorsysteme Dresden GmbH  
ICA Northeast, Inc.  
ICA South, Inc.  
Integrated Cable Assembly Holdings, Inc.  
KE Elektronik GmbH  
KE Ostrov-Elektrik s.r.o.  
Konfektion E-SK s.r.o.  
Konnektech, LTD  
MTS Sensor Technologies GmbH and Co. KG  
New Product Integration Solutions, Inc  
PCB Piezotronics, Inc.  
PCTEL, Inc.  
Positronic Industries, Inc.  
Shanghai Amphenol Airwave Communication Co. Ltd.  
Sine Systems Corporation  
SSI Technologies s.r.o  
SSI Technologies, Inc  
SSI Technologies, LLC  
SV Microwave, Inc.  
Telect, Inc  
Temposonics, LLC  
Times Fiber Communications, Inc.  
Unlimited Services of Wisconsin, LLC

xGIGA Communication Technology Co., Ltd.