

Slavery and Human Trafficking Statement for the Fiscal Year Ended September 30, 2020

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and serves as the modern slavery and human trafficking statement for the fiscal year starting October 1, 2019 and ended September 30, 2020.

## **Organization's Structure, Business and Supply Chain:**

The undersigned is a wholly owned subsidiary of TE Connectivity Ltd. (TE) and has its head office in the United Kingdom.

TE is a global designer and manufacturer of connectivity and sensor solutions serving customers in approximately 150 countries. TE operates through the following reportable segments: Transportation Solutions, Industrial Solutions, and Communications Solutions. All TE entities adopt and apply TE's foundational policies, including the TE Connectivity Guide to Supplier Social Responsibility and TE's Guide to Ethical Conduct available at <a href="https://www.te.com/usa-en/about-te/corporate-responsibility/governance.html">https://www.te.com/usa-en/about-te/corporate-responsibility/governance.html</a>.

TE's supply chain includes suppliers of raw materials, commodities, components, and services required to support our operations. As with most companies our size, TE's global supply chain is always evolving. We have over 32,104 direct and indirect suppliers, and we continue to increase diversity and localization of supply and seek to partner with suppliers who ultimately enable us to connect things, places and people efficiently and responsibly.

TE employs approximately 82,000 people worldwide, of whom 29,000 are in the Americas region, 31,000 are in the EMEA region and 22,000 are in the Asia-Pacific region. TE emphasizes employee development and training and embraces diversity and inclusion.

## **TE's Commitment:**

TE is committed to conducting business in responsible ways and addresses modern slavery and human trafficking through our foundational policies.

- The TE Connectivity Guide to Supplier Social Responsibility addresses TE's labor and human rights expectations:
  - a. Freely Chosen Employment: All employment will be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to surrender government-issued identification, passports or work permits as a condition of employment.
  - Prohibitions on Child Labor: Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing



- compulsory education, or under the minimum age for employment in the country, whichever is greatest.
- c. Working Hours: A work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations, and workers shall be allowed at least one day off per seven-day week.
- d. Wages and Benefits: Compensation paid to workers shall comply with all appropriate wage laws, including those relating to minimum wages, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.
- e. Humane Treatment: There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.
- f. Non-Discrimination: Suppliers must be committed to a workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, gender identity, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way as a condition of employment.
- g. Freedom of Association: Our suppliers must respect the rights of workers to associate freely, to join or not join labor unions, to seek representation, and to join workers' councils in accordance with local laws. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.
- h. Conflict Minerals: Our suppliers are expected to meet the requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act for applicable disclosures relating to specified conflict minerals emanating from and around the Democratic Republic of the Congo.
- TE Connectivity's Guide to Ethical Conduct ("Guide") outlines TE's position on fair treatment and human rights for our employees and for all people.
  - a. Among other requirements, the Guide (i) provides that we are committed to human rights, for all people, everywhere in the world, (ii) prohibits all forms of forced, trafficked or child labor and any activity that violates individual dignity, and (iii) prohibits any form of physical punishment, abuse and harassment. Every TE employee is required to participate annually in a training session on the Guide, to commit to embrace and utilize the Guide's principles in their daily work activities, and to report any activity that may be deemed a violation of the Guide.



- b. The Guide also calls for communication with suppliers regarding TE's core values, as well as the United Nations Global Compact and the spirit of the Responsible Business Alliance (formerly the Electronics Industry Citizenship Coalition) and requires TE's suppliers to comply with the Guide to Supplier Social Responsibility.
- In 2020, TE released a new Human Trafficking and Modern Slavery Policy ("Policy"), which further
  addresses TE's expectations related to human trafficking and slavery including forced labor and
  unlawful child labor.
  - a. The objective of the Policy is to better detail how TE will conduct its business and meet applicable legal, regulatory, and operational obligations with respect to human trafficking and slavery, including without limitation the Federal Acquisition Regulation ("FAR") Combatting Trafficking in Persons regulation, the California Transparency in Supply Chains Act, and the UK Modern Slavery Act.
  - b. The Policy applies to all TE employees, directors, and officers, and to all other personnel employed by or engaged to provide services to TE, including temporary employees, and independent contractors authorized to act for or on behalf of TE.
  - c. The Policy prohibits all forms of human slavery or practices similar to slavery, such as the sale and trafficking of persons or body parts, debt bondage and involuntary servitude, forced or compulsory labor, and obtaining labor from a person by threats of serious harm to that person or another person.
  - d. The Policy includes a training component that will be developed and deployed on an annual basis to employees and third-party contractor personnel who have direct responsibility for the Company's operations and supply chain management concerning the requirements of this Policy.
  - e. The Policy also calls for communication regarding the principles and requirements set forth in this Policy with suppliers, subcontractors and agents, including TE's expectation that all suppliers will comply with the expectations and requirements in the Policy. The Policy also includes content on how TE will oversee and manage its supply chains to provide assurance of compliance including verification, certification and auditing.
  - f. Lastly, the Policy provides guidance for reporting any actual or suspected violations of the Policy.

## Actions with Respect to Due Diligence and Assessing Risks of Modern Slavery and Human Trafficking & Assessing Effectiveness:

TE has established practices to help monitor our suppliers, including Supplier Social Responsibility Audits, and we seek to build on these existing practices. Detail on these activities may be found in TE's Corporate Responsibility Report (<a href="https://www.te.com/usa-en/about-te/corporate-responsibility.html">https://www.te.com/usa-en/about-te/corporate-responsibility.html</a>).

TE also maintains an Office of the Ombudsman, an independent, impartial and confidential resource for our employees, suppliers, investors and customers to report and/or discuss possible violations of



laws, policies, rules, regulations or the Guide. In addition, TE maintains an independently managed 24-hour reporting hotline and website to provide a safe and anonymous means for our employees and external stakeholders to report any possible violations of laws, policies, rules, regulations or the Guide.

In addition to our annual Guide to Ethical Conduct training and certification, we seek a separate confirmation from our key HR leaders with global and/or regional responsibilities and members of the TE Law Department who have oversight over labor and employment-related matters that the individual is not aware of any labor and employment practice maintained by TE that would violate the Guide or evidence modern slavery or human trafficking.

## **Education:**

In 2020, TE again deployed its company-wide annual training on TE's Guide to Ethical Conduct. TE had a 100% completion rate for this training.

As part of the training component in TE's new Human Trafficking and Modern Slavery Policy referenced above, we have developed training for supply chain personnel that will be deployed in 2021. This training will provide detailed content on human trafficking and modern slavery risk, recognizing warning signs and what to do if TE personnel have concerns about a supplier.

Director,

/S/ HAROLD G. BARKSDALE

Harold G. Barksdale

For and on behalf of Tyco Electronics UK Ltd.

The Statement was approved by the directors of Tyco Electronics UK Ltd. at a duly noticed meeting and then executed. The Statement shall be placed on the Corporate Responsibility section of the TE Connectivity website.