

September 30, 2022.

Slavery and Human Trafficking Statement for the Fiscal Year Ended September 30, 2022

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, 2021 and ended

## 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 and selling products into approximately 140 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* (TEC-1015), *TE Connectivity Guide to Ethical Conduct*, and our *Global Human Rights Policy* (TEC-04-37) 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> as well as TE's *Human Trafficking and Modern Slavery Policy*.

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 27,277 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.

As of fiscal year end 2022, TE employed approximately 92,000 people worldwide including contract employees, of whom 28,000 were in the Americas region, 37,000 were in the EMEA region and 27,000 were 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.

- 1. The TE Connectivity Guide to Supplier Social Responsibility (TEC-1015) was revised in December 2022 to update TE's expectations for our suppliers with respect to business conduct, decision-making, and business interaction. It outlines key principles and behaviors, based on our Core Values, and emphasizes the principles and behaviors that we require of our suppliers. It addresses TE's labor and human rights expectations as follows:
  - a. <u>Freely Chosen Employment</u>: 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. This section was also updated to add that all forms



of forced labor and slavery by our suppliers are forbidden, including the use of bonded labor (including debt bondage), indentured labor, involuntary or exploitive prison labor, obtained under the threat of punishment, withholding identity papers, requiring workers to deposit a bond or any other constraint, by our suppliers, whether directly or indirectly, transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. Materials may not be sourced from regions prohibited by US or international law.

- b. <u>Prohibitions on Child Labor</u>: 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: Work weeks are not to exceed the maximum allowable hours permitted by local law. 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. <u>Humane Treatment</u>: 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. This section was updated to reflect that Suppliers shall not engage in discrimination based on various dimensions, including, but not limited to, gender, gender identity, age, race, color, ethnicity, sexual orientation, pregnancy, disability, nationality, social status, religion, political affiliation, union affiliation, marital status, veteran status, background, culture, and experience 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. <u>Freedom of Association</u>: Our suppliers must respect the rights of workers to associate freely and bargain collectively, 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 have appropriate Conflict Minerals due diligence mechanisms, related policies and processes in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as any additional applicable standards. To meet necessary global due diligence and traceability laws, regulations and customer requirements, TE suppliers are obligated to disclose any minerals or materials sourced from conflict affected areas (commonly referred to as "Conflict Minerals") used in the production of any product(s) supplied to TE. Conflict Minerals include any mineral, material or metal as defined under the following, without limitation: (i) Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act, (ii) the European Union (EU) Conflict Minerals Regulation, (iii) other applicable law (if and as applicable), or (iv) otherwise identified by a TE customer (even if such mineral, material or metal is not from a conflict affected area).

The **TE Connectivity Guide to Supplier Social Responsibility** was also updated to add the following new sections in compliance with the German Supply Chain Due Diligence Act:

- i. <u>Environmental Impact on Local People</u>: Our suppliers must ensure that local people are not impaired by its business activity, e.g., through harmful soil contamination, water pollution, air pollution, harmful noise emission or excessive water consumption which impact the natural resource basis for the preservation and production of food, access to safe drinking water and sanitary facilities.
- j. <u>Unlawful Eviction of Land</u>: Our suppliers must respect the rights of residents, people and communities affected by its business activities and will not unlawfully evict or deprive people of their homes, lands, and waters.
- k. <u>Prohibition of Violent Security Forces</u>: Hiring or using violent private or public security forces is prohibited. Suppliers must not use any security forces for the protection of their entrepreneurial activities if the security forces torture people or treat them in a cruel, inhumane, or degrading way, using excessive force leading to injuries of life or body or if they impair the freedom of assembly and association.
- 2. The **TE Connectivity 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.
- 3. As previously reported, TE released a dedicated *Human Trafficking and Modern Slavery Policy* (TEC-01-71) in 2020.
- 4. In 2021, we published TE's Global Human Rights Policy (TEC-04-37). The policy outlines our commitment to operating with respect for human rights and how this is core to our values-based culture. The purpose of this policy is to clearly state in one document our commitment to human rights and the steps we take to uphold that commitment. The policy was updated in March 2023 to include that TE respects the rights of residents, people and communities affected by its business activities and will not unlawfully evict or deprive people of their homes, lands and waters.
- 5. In 2022, we published the TE Connectivity Declaration of Principles on Human Rights of the German Operating Legal Entities of the TE Connectivity Group in Germany (Declaration) pursuant to the German Supply Chain Due Diligence Act / Lieferkettensorgfaltspflichtgesetz, which can be found at <a href="https://supplier.te.com/web/supplier-portal/home">https://supplier.te.com/web/supplier-portal/home</a>. This declaration outlines TE's commitment to human rights consistent with international standards, provides TE's guidelines and policies, and outlines our implementation process.

## 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>).

- 1. <u>Supplier STRT Campaign</u>: In December 2021, TE continued to build on our existing practices by launching a Human Trafficking and Slavery Survey (Survey) for certain suppliers using the Slavery and Trafficking Risk Template (STRT), an industry standard survey used to collect human trafficking and slavery data from supply chains.
  - a. The Survey and supplier information gathering is facilitated by a third-party compliance information gathering service (TPCS) provided by a leading software-as-a-service solution accessed by TE's suppliers. Since this was a new survey and not knowing how receptive TE's suppliers would be to voluntarily respond, TE surveyed approximately 1,000 high risk suppliers for the first year. This first campaign resulted in 137 responses or a 14% response rate.



- b. In December 2022, TE launched a second annual STRT campaign and sent surveys to over 3,700 suppliers. As of February 15, 2023, we received approximately 533 responses or a 14% response rate. The STRT campaign is being expanded in late-March 2023 to include the updated STRT version 3.2, which adds aluminum and PVC into the scope of the survey.
- c. TE continues to develop any corrective action plans (as needed), trainings, or any other actions necessary to ensure compliance with obligations.
- Sub-tier Due Diligence: We continue to look at data analytic tools and resources for sub-tier due
  diligence efforts for further risk analysis to further analyze and manage expectations with the
  Survey moving forward.
- 3. <u>Human Rights Officer</u>: As part of our *Declaration of Principles* implementation process referenced above, TE has appointed a Human Rights Officer, whose responsibilities include monitoring risk management, which includes (a) risk assessment, (b) prevention of violations, (c) grievance mechanisms, (d) remediation measures, and (e) review and improvement of our measures with respect to human rights issues.
- 4. Enterprise Human Rights Risk Assessment: In 2022, TE conducted a human rights risk assessment via a third-party service provider to understand potential risks and impacts across our value chain to strengthen our due diligence and remediation if issues arise. This assessment concluded in March 2023. TE will review the results of the assessment and will begin implementing recommendations, as needed.
- 5. <u>Supply Chain Mapping</u>: New supply chain mapping criteria was introduced in our updated TEC-1015 referenced above. Due to increasing business continuity, sustainability and compliance requirements, TE requires its suppliers to conduct and support necessary supply chain mapping initiatives, including but not limited to efforts sufficient to meet 'clear and convincing' documentation standards that demonstrate (i) the identity and location of supplier's subcontractors and suppliers and (ii) the origin of its products and any component and raw materials in its products (collectively "Supply Chain Mapping Evidence"). Supply Chain Mapping Evidence must meet the standards set by the United States Department of Homeland Security.

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 2022, TE again deployed its company-wide global annual training on TE's *Guide to Ethical Conduct,* which includes human rights topics. TE again had a 99%+ completion rate for this training (active employees on TE payroll at the time of the commitment campaign).

As part of the training component in TE's *Human Trafficking and Modern Slavery Policy* referenced above, we are finalizing training for supply chain personnel that will be deployed in 2023. 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

Januar Burne

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.