



Slavery and Human Trafficking Statement for the Fiscal Year Ended September 30, 2023

This annual statement is made pursuant to Section 54 of the U.K. Modern Slavery Act 2015 and serves as the modern slavery and human trafficking statement for the fiscal year starting October 1, 2022 and ended September 30, 2023 (**Statement**).

Organization's Structure, Business and Supply Chain

Tyco Electronics UK Ltd. is a wholly owned subsidiary of TE Connectivity Ltd. (**TE**) and has its head office in the United Kingdom. TE is a public company listed on the New York stock exchange. 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.

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 30,993 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 2023 (**FY23**), TE employed approximately 90,000 people worldwide including contract employees, of whom 27,000 were in the Americas region, 38,000 were in the EMEA region and 25,000 were in the Asia-Pacific region. TE emphasizes employee development, including training and embraces diversity and inclusion.

Corporate Governance

TE's Human Rights Program. Our human rights program at TE is governed in partnership with the legal and human resources departments, who set forth policies, training, and due diligence. Our Executive Vice President and General Counsel and Chief Human Resources Officer are briefed quarterly on our progress. TE's Board of Directors is also informed at least annually on the progress of our human rights program.

Establishment of TE Human Rights Committee. Based on the Enterprise Human Rights Risk Assessment referenced below, TE is in the process of establishing an enterprise-wide Human Rights Committee (Committee). The Committee will include representatives from Human Resources, Government Affairs, Procurement, Ombudsman and Legal. The Committee will help guide the organization to manage salient human rights issues across TE's value chain and be responsible for the following:

- implementation of our global human rights policy;
- screening and assessing areas of the business to identify gaps or risks to the business in relation to human rights obligations;
- preparing action plans to address any risks or gaps identified in relation to the above;
- implementing due diligence processes;
- support of training and awareness-building initiatives with TE employees and suppliers; and
- preparing TE for upcoming regulatory requirements and monitoring human rights risks in the value chain.



TE's Commitment and Framework

Since Tyco Electronics UK Ltd. is a wholly owned subsidiary of TE and is subject to TE Global Policies, explained in this Statement, Tyco Electronics UK Ltd. relies upon its parent company's application of the TE Global Policies and processes to provide a common enterprise-wide approach to managing human rights and related compliance.

As good corporate citizens, who value our place in the global community and respect all applicable civil rights, human rights and labor laws in the locations where we operate, TE is committed to conducting business in responsible ways and addresses modern slavery and human trafficking through our foundational policies. We require that our suppliers do the same. All TE employees are required to adhere to TE's policies, including the following (collectively **TE Global Policies**):

1. **TE Connectivity Guide to Ethical Conduct (Ethical Conduct Guide)** outlines TE's commitment to fair treatment and human rights and applies to both TE employees and suppliers.
 - a. Amongst other requirements, the *Ethical Conduct Guide* sets out TE's commitment with respect to Human Rights, Social Responsibility, and Global Corporate Citizenship. It prohibits all forms of forced, trafficked or child labor, and any activity that violates individual dignity, and prohibits any form of physical punishment, abuse and harassment.
 - b. As a signatory to the United Nations Global Compact, TE communicates with its employees and suppliers regarding a shared commitment to TE's Core Values as well as the guiding principles of the Organisation for Economic Co-operation and Development (**OECD**).
2. **TE Connectivity Human Trafficking and Modern Slavery Policy (TEC-01-71)** provides that TE is committed to a work environment and value chain that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. The policy further:
 - a. prohibits additional practices connected with human trafficking;
 - b. stipulates that TE will develop and deploy appropriate training, including annual training for third-party contractor personnel and TE employees who have direct responsibility for TE's operations and supply chain management;
 - c. provides that any personnel who violate the policy may be subject to appropriate disciplinary and/or corrective action up to and including termination of employment or contract;
 - d. stipulates that TE will communicate the principles and requirements set forth in the policy to suppliers, subcontractors and agents.
3. **TE Connectivity Global Human Rights Policy (TEC-04-37)** broadly defines how TE respects human rights in our operations, supply chain, and the communities in which we operate. TE has identified the following human rights issues as most salient for our operations:
 - a. Child labor;
 - b. Forced labor and human trafficking, including all forms of slavery;
 - c. Health and safety;
 - d. Harassment-free workplace, including equal treatment;



- e. Equal opportunity; and
- f. Respect and civility

4. **TE Connectivity Reporting and Investigating Misconduct Policy (TEC-01-57)** is intended to establish procedures and responsibilities for reporting alleged violations of applicable laws or regulations, the *Ethical Conduct Guide*, TE policies and procedures, and for the investigation and any corrective action related to those reports. The policy also includes a prohibition against retaliation and an enhanced whistleblower protection.

In addition to TE's Global Policies outlined above, TE also published the **TE Connectivity Declaration of Principles on Human Rights of the German Operating Legal Entities of the TE Connectivity Group in Germany (Declaration)** in 2022 pursuant to the German Supply Chain Due Diligence Act / Lieferkettensorgfaltspflichtgesetz, which can be found at <https://supplier.te.com/web/supplier-portal/home>. This Declaration outlines TE's commitment to human rights consistent with international standards, provides TE's guidelines and policies, and outlines our implementation process.

Due Diligence Processes and Assessing Risks of Modern Slavery and Human Trafficking with Suppliers

TE has established practices to help guide and monitor our suppliers, which include: (1) Policies and Standards, (2) Business Partner Risk Assessment / Screening, and (3) Supplier Due Diligence through our Supplier Social Responsibility (SSR) Audits and annual Human Trafficking and Slavery Survey. We continue to build on these existing practices through a continuous improvement approach.

1. **Policies and Standards.** TE seeks to engage primary suppliers whose values and supply chain practices align with TE's commitment to address modern slavery and human rights. TE has several policies and standards as part of our due diligence processes aimed to address supplier compliance, including the following:

- a. **TE Connectivity Guide to Supplier Social Responsibility (TEC-1015).** TE developed the Guide to Supplier Social Responsibility (**SSR Guide**) using best practices advocated by the OECD and the United Nations (UN) Global Compact. It is aligned with our SSR activities, which are guided by principles in the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the UN Convention Against Corruption.

The SSR Guide was updated in FY23 to incorporate TE's expectations for its suppliers with respect to business conduct, decision-making, and business interaction. It outlines key principles and behaviors, based on TE's Core Values (set out in the *Ethical Conduct Guide*), and emphasizes the principles and behaviors required of suppliers. It addresses TE's labour and human rights expectations as follows:

- i. freely chosen employment;
- ii. prohibitions on child labour;
- iii. working hours;
- iv. wages and benefits;
- v. humane treatment;
- vi. non-discrimination;
- vii. freedom of association;



- viii. metals materials / supplies from Conflict-Free Mines;
 - ix. environmental impact on local people;
 - x. unlawful eviction of land; and
 - xi. prohibits violent security forces.
 - b. **Supply Chain Mapping.** As part of the FY23 update to the SSR Guide, supply chain mapping criteria was introduced. 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 the highest documentation standards that demonstrate 'Supply Chain Mapping Evidence' which comprises:
 - 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
 - c. **Supplier Approval and Onboarding Processes.** TE maintains and follows an internal Supplier Onboarding Process to determine whether to engage a new supplier. The Supplier Onboarding Process requires TE suppliers to agree to comply with the SSR Guide as referenced above or document a similarly robust code of conduct and processes.
- 2. **Business Partner Risk Assessment / Screening.** TE has a process for assessing the risk posed by its suppliers in relation to human rights practices in its operations and supply chains. This process involves:
 - a. **Screening TE's Business Partners.** TE screens business partners, including suppliers, as part of the onboarding process to determine if they are listed on any sanction or restricted party lists. We take a proactive risk management approach with certain material suppliers by monitoring their business conditions and using technology to receive alerts of potential associations with high-risk suppliers in their supply chain.
 - b. **Business Partner Management (BPM).** We further utilize a Business Partner Management (BPM) program that provides a targeted due diligence and screening process based upon objective risk assessments to retain and manage certain in-scope business partners ensuring their adherence to TE's Core Values and preventing potential harm to TE's brand and reputation by limiting our exposure to potential bribery and corruption. This process helps ensure that our business partners operate ethically, in accordance with the law and reflects our Core Values. We utilize this BPM process through our supplier onboarding and through continuous monitoring of our existing business partners.
- 3. **Supplier Due Diligence.** TE also has established practices to help monitor, identify and assess potential adverse impacts on modern slavery and human trafficking as part of our due diligence measures aimed to address supplier compliance, including the following:
 - a. **TE Supplier Social Responsibility (SSR) Audits.** TE manages SSR Audits performed by a third-party auditing firm. TE's third party auditor is appropriately qualified with technical expertise in supplier social responsibility assessment and the technical audit process.

The SSR Audit validates supplier's values and principles outlined in TE's SSR Guide and identifies areas of concern related to forced labor/human trafficking, child/young labor,



discrimination, compensation, working hours, environment, health & safety, freedom of association, ethics and subcontracting. TE's third party auditor conducts detailed on-site audits and follow-up audits as needed to monitor corrective action plans.

- b. **Human Trafficking and Slavery Survey:** TE conducts an annual Human Trafficking and Slavery Survey (**HTS Survey**) of 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. The HTS 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.
 - i. In FY22, TE launched its first HTS Survey. In FY23, TE launched a second annual HTS campaign, tripling the number of surveys sent to suppliers and increasing our response rate.
 - ii. Since TE started the HTS Survey for data gathering, we are continuing to enhance our process in working to align any remediation plans, determined after the surveys are reviewed, with our SSR audit process, including any corrective action plans, audits, trainings, or any other actions necessary to ensure supplier compliance.

Due Diligence Processes and Assessing Risks of Modern Slavery and Human Trafficking within TE

1. **Enterprise Human Rights Risk Assessment.** During FY23, TE conducted a human rights risk assessment via a third-party service provider to understand potential risks and impacts across TE's value chain to strengthen due diligence and remediation processes.
2. **Employee Training.** As part of TE's company-wide global training on TE's *Ethical Conduct Guide*, every TE employee is required to participate and certify annually in a training session, which includes protecting human rights including: (1) child labor, forced labor and human trafficking; (2) employee health and safety; (3) harassment-free workplace; (4) equal employment opportunity; and (5) respect and civility topics. In 2023, TE again had a 99%+ completion rate for this training, which included active employees on TE payroll at the time of the commitment campaign.
3. **Human Resources (HR) Internal Human Rights Survey.** In addition to our annual Ethical Conduct Guide training and certification, TE conducts an internal annual Human Rights Survey for 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 *Ethical Conduct Guide* or evidence modern slavery or human trafficking.

Grievance Mechanism

Office of the Ombudsman Program. The Office of the Ombudsman acts as an independent, impartial and confidential resource with whom employees, suppliers, investors, customers and other third parties can ask questions or raise concerns about potential violations of applicable laws, regulations, the *Ethical Conduct Guide*, TE policies and procedures, and TE's Core Values. The Ombudsman reports directly to the Audit Committee of the TE Board of Directors and ensures that all reported issues are investigated, communicated to all affected stakeholders and resolved in an appropriate manner. Often, the post-investigation corrective actions enable TE to make process improvements or otherwise rectify an



inefficiency for the benefit of TE or its employees. Information about the program is publicly available on the TE website at [Office of the Ombudsman | TE Connectivity](#).

Based on TE's Corporate Responsibility Report (see link below), the total number of matters reported to the Office of Ombudsman related to Human Rights has been zero for the past three years from FY2020 through FY2022.

Continuous Improvement

TE applies a continuous improvement approach to improve processes, practices, and guidance. Areas of focus going forward include:

1. We intend to provide more in-depth training to employees with the most exposure to potential human rights issues.
2. TE Human Rights Committee intends to design and implement a framework to evaluate processes for investigating, assessing, and handling human rights risks in its business and supply chains.
3. We intend to expand our SSR Audits to other high-risk countries / regions.
4. Continuing to enforce and promote awareness of the *Ethical Conduct Guide* and *Global Human Rights Policy*.

Conclusion

TE and Tyco Electronics UK Ltd. are demonstrably committed to ensuring that it complies with its human rights obligations. As described above, TE is taking active steps to improve its modern slavery and human rights processes on an ongoing basis.

Additional detail on the TE human rights program may be found in TE's Corporate Responsibility Report available at [Disclosures | Corporate Responsibility | TE Connectivity](#).

Director,

A handwritten signature in blue ink, appearing to read 'Harold G. Barksdale'.

/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.