



Knight Electronics, Inc. and Supplier Code of Conduct

Knight Electronics, Inc.™

Environmental Compliance Department

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Knight Electronics, Inc. has operated with high ethical business standards and integrity in the communities where we work and live since 1979. To preserve the trust placed in us, we count on our network of Suppliers and business partners across the globe to commit to and uphold our high standards of integrity, values, and operating principles.

Our Knight Electronics and Supplier Code of Conduct, updated in January 2022 as may be amended from time to time (the “Code of Conduct”), outlines Knight Electronics’ expectations and guidelines with respect to responsible sourcing including our commitments to human rights, the environment, health and safety, business ethics, and the development of a diverse and sustainable supply chain. The Knight Electronics and Supplier Code of Conduct is aligned with the International Bill of Human Rights, The ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UNGPs), and the Ten Principles of the UN Global Compact.

We require all Suppliers and business partners to comply with this Code of Conduct. “Suppliers” refers to any third party that provides goods or services to Knight Electronics for compensation including, but not limited to, our direct and indirect suppliers, logistics providers and distributors. Sub-contractors of suppliers are also expected to adhere to the Code of Conduct.

We expect our Suppliers and business partners to communicate these expectations throughout their supply chain by adopting efficient management systems, policies, procedures, and training to uphold the standards and expectations set forth in this Code of Conduct within their own business operations, just as Knight Electronics upholds these same standards on ourselves pursuant to our Code of Conduct.

We require our Suppliers and our own business entities to abide by all applicable national, state, and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Code of Conduct, we expect our Suppliers to comply with the more stringent standards and principles.



In the spirit of continuous improvement, Knight Electronics is committed to working with and supporting our Suppliers to meet, and when possible, exceed, the requirements in this Code of Conduct.

By its acceptance of any purchase order from Knight Electronics, the Supplier acknowledges its acceptance of the Code of Conduct and intention to comply with its requirements.

CHILD LABOR

Knight Electronics does not tolerate any form of child labor in our supply chain or in our own business operations. We are committed to the elimination of the “worst forms of child labor,” as defined by ILO Convention 138 & 182. Knight Electronics expects our Suppliers to prevent child labor in their operations and encourages our Suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

- No individuals are hired under 15 years of age, or 14 years of age where local law allows, and such exception is consistent with ILO Convention No. 138 & 182, or under the legal minimum age for employment in the country, whichever is greatest.
- Any employment of workers under the age of 18 does not interfere with schooling or vocational education or expose children to risks that can harm physical, mental, or emotional development.

FORCED LABOR AND HUMAN TRAFFICKING

Knight Electronics does not tolerate any form of abusive or illegal labor in our supply chain or in our own business operation, such as forced labor or human trafficking. Knight Electronics requires that all labor in its organization be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including but not limited to any form of prison, slave, bonded, or forced indentured labor.

- The recruitment, transportation, transfer, harboring, or receipt of people, by means of threat or use of force, coercion, or other means, for the purpose of exploiting them is prohibited.
- In advance of employment, workers are provided accurate and understandable information about the basic terms of their employment clearly stating their rights and responsibilities as well as information on wages, hours, and holidays.
- Workers are free to leave work and terminate their employment upon reasonable notice without penalty and employers must not retain any personal identification, travel documents, or wages as conditions of employment.

- Job seekers and current employees are not charged or required to pay fees or deposits to gain or maintain their employment.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

Knight Electronics respects the rights of employees to freedom of association and collective bargaining across its operations and supply chain.

- Workers have the right to form, join, or not join trade unions or other organizations of their choosing and collectively bargain without fear of discrimination, retaliation, harassment, or intimidation.
- In cases where freedom of association is restricted by local law, alternative means of freedom of association will not be obstructed.

NON-DISCRIMINATION

Knight Electronics does not tolerate any form of discrimination in the workplace. We are committed to diversity and inclusion in the work environment.

- Discrimination in the workplace that is based on the grounds of an individual's race; color; gender; age; national origin; religion; citizenship status; political opinion; marital status; sexual orientation; engaging in, or refraining from engaging in, protected union activity; gender identity; transgender status; physical or mental disability; protected veteran status; genetic information; pregnancy (including childbirth and related medical conditions, including medical conditions related to lactation); or other categories protected by applicable federal, state, or local law goes against Knight Electronics values and is strictly prohibited.
- Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination are based solely on the worker's skill, ability, experience, and performance.

HARASSMENT

Knight Electronics does not tolerate any form of disparate treatment in the workplace.

- All workers will be treated with dignity and respect and will not be subject to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment.
- Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to all workers.

WORKING HOURS, WAGES, AND BENEFITS

Knight Electronics is committed to upholding applicable laws and collective bargaining agreements regarding working hours, wages, and benefits for individuals employed throughout the organization. We also encourage our Suppliers to work toward paying a wage that is sufficient for workers to meet their basic needs.

- Wages and benefits are paid on time and at least equal to the applicable legal minimum wage and any associated statutory benefits.
- Working hours reflect applicable legal norms and overtime hours are paid at the legally mandated premium or in line with the guidance provided by ILO Convention 1 (the rate of pay for overtime shall not be less than one-and-one-quarter times the regular rate) if there is no mandated premium.
- Suppliers shall ensure that work schedules and rest periods are consistent with applicable local legal requirements. Work hours and schedules should not be excessive and negatively impact on employees' health or safety.
- Temporary labor arrangements, including the excessive use of fixed-term contracts, labor-only contracting, sub-contracting, or home-working, are not to be used to avoid obligations to workers under labor or social security laws and regulations.

WORKER HEALTH & SAFETY

Knight Electronics, Inc. requires that all workers be provided with a safe and healthy working environment.

- Workers have the right to refuse and report unsafe or unhealthy working conditions regardless of role, title, or responsibility.
- Workers are trained in the appropriate occupational health and safety policies and procedures, including emergency evacuation procedures, prior to employment and then on a regular basis. Workers are provided with appropriate protective equipment and instructed on appropriate use.
- Potable drinking water is provided to all workers as well as adequate and clean sanitation facilities for male and female workers. Unreasonable limitations on workers' access to toilets, rest, or lactation breaks are prohibited.

MATERIAL SAFETY & QUALITY

Knight Electronics is dedicated to providing safe, high-quality products and we expect our Suppliers to help us meet this commitment.

- Products and services delivered must meet or exceed material safety and quality standards required by applicable law and Knight Electronics' stringent quality standards.
- Any concerns about product safety or quality must be reported to Knight Electronics.

ENVIRONMENT

Knight Electronics is committed to reducing our environmental impact across our supply chain and to supporting sustainable operational and production practices. We work with our Suppliers who are critical partners in our efforts to responsibly and sustainably source our components, raw materials, packaging materials, and other goods and services in a way that will help reduce our impact on air, land, and water.

- Operations fully comply with all federal and local environmental laws and regulations including those related to waste disposal, hazardous waste, greenhouse gas emissions, wastewater, and toxic substances.
- Air emissions, wastewater, and solid waste generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.
- Operations and work across supply chains do not contribute to deforestation or loss of biodiversity. Suppliers are encouraged to implement their own No Deforestation Policy and commitments to protecting High Conservation Value and High Carbon Stock areas.
- All required environmental permits (e.g. discharge and effluent monitoring records) are obtained, maintained, and kept current and any operational, registration, and reporting requirements shall be followed.
- Suppliers are encouraged to actively measure, manage, and disclose environmental impacts in areas such as Greenhouse Gas (GHG) emissions, water, and waste as well as setting targets and implement action plans for reducing environmental impacts. Public reporting on annual environmental performance is encouraged.

BUSINESS ETHICS

Knight Electronics is committed to conducting business ethically and lawfully in countries where we operate across our supply chain. We only do business with Suppliers and business partners who demonstrate a strong commitment to ethical behavior.

- Suppliers conduct their business in accordance with the highest ethical standards and have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, embezzlement, and even the appearance of conflicts of interest.
- Suppliers' business dealings should be fair, legal, and honest.
- Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

- If Suppliers and business partners extend any business courtesies to our employees, they will do so infrequently, and the courtesies must be of no more than moderate value. Suppliers and business partners will also accurately reflect their business dealings in their books and records.
- Suppliers and business partners with access to Knight Electronics confidential information should not disclose such information to any other person without our advance written consent.
- To the extent that Suppliers and business partners transports goods for Knight Electronics into the United States, Suppliers shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S.
- Customs website at www.cbp.gov (or other website established for such purpose by the U.S. government).

GRIEVANCE MECHANISMS

Knight Electronics expects Suppliers to provide grievance mechanisms, as we provide in our own organization, that are transparent, responsive, anonymous, unbiased, and confidential to workers and other parties across the organization.

- Workers know of and have access to grievance mechanisms which allow for anonymous reporting. Reported concerns and violations are addressed in a timely manner and follow a clearly outlined process.
- Workers who speak up in good faith are protected from retribution, retaliation, and reprisal.
- Knight Electronics is notified if any concerns or violations are reported through the grievance mechanism that are in direct violation of this Code of Conduct. Violations and concerns may also be reported directly to Knight Electronics.

MANAGEMENT SYSTEMS, COMPLIANCE, AND AUDITING

Knight Electronics verifies compliance with this Code of Conduct within our organization through internal and external assessment, yearly on-site internal or independent third-party audits. Such audits may inspect our own facilities, operations, books and records. If non-compliances are observed, Knight Electronics will be required to take corrective actions.

Suppliers ensure that adequate and effective management systems, policies, procedures, financial documentation and training are in place to ensure ongoing compliance with the Code of Conduct. We reserve the right to request from our Suppliers information about the management of relevant issues outlined in the Code of Conduct.



Knight Electronics reserves the right to verify our Supplier's compliance with this Code of Conduct through internal and external assessment mechanisms, such as self-assessment questionnaires, announced and unannounced on-site independent third-party audits, and worker well-being surveys. Such audits may inspect Suppliers' facilities, operations, books and records, and Supplier-provided housing, and may include confidential worker interviews. If non-compliances are observed, the Supplier will be required to take corrective actions.

If Suppliers fail to implement the recommended corrective action plans and do not remedy any act of non-compliance in a timely manner, Knight Electronics may, in its sole discretion and without any further obligation to Suppliers, suspend purchases, refuse to take delivery under any purchase order and return any goods or services from the Supplier until the corrective actions have been implemented, or may terminate its business relationship with the Supplier in addition to any other rights or remedies available to Knight Electronics.

We also reserve the right to request that Suppliers disclose information that may pertain to geographical location of facilities that produce any item supplied to Knight Electronics and origin of raw materials produced within their facilities.

Management of our Knight Electronics and Conduct of Conduct is the responsibility of our Compliance Department. Ultimate oversight for Global Responsible Sourcing resides with our Executive Management (inclusive of the President and the President's direct reports) which are briefed on an annual basis.

A handwritten signature in black ink, appearing to read "John Knight", is written over a light blue horizontal line.

John Knight
President of Knight Electronics, Inc.