



## **ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made pursuant to comply with both the California Transparency in Supply Chains Act of 2010 (effective January 1, 2012, the "California Act") and the Modern Slavery Act 2015 (effective October 29, 2015, the "U.K. Act") and sets out the steps that KYOCERA AVX Components Corporation (together with their consolidated subsidiaries, "KYOCERA AVX or the "Company") has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain and provides an update on our activities and commitments to prevent modern slavery in our operations and supply chains.

### **Our Commitment**

KYOCERA AVX is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor, and all other trafficking-related activities (together, "modern slavery and human trafficking"). We are committed to fully complying with all applicable international human rights standards, labor and employment laws, rules, and regulations, and to working to mitigate the risks of modern slavery and human trafficking in our business operations and supply chains. This commitment is set forth in [The Kyocera Group Human Rights Policy](#) which supports the "Universal Declaration of Human Rights," the "ILO Declaration on Fundamental Principles and Rights at Work," the UN "Guiding Principles on Business and Human Rights," and "the ten principles of the UN Global Compact" and further outlined for Employees in the [KYOCERA AVX Code of Business Conduct & Ethics](#) and our Suppliers in the [KYOCERA AVX Supplier Code of Conduct and Sustainability Policy](#).

KYOCERA AVX has a zero-tolerance approach to any form of modern slavery. KYOCERA AVX is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Business**

KYOCERA AVX is a leading worldwide manufacturer, supplier, and reseller of a broad line of electronic components; interconnect, sensing and control devices; and related products. Electronic components and connector, sensing and control products manufactured or resold by KYOCERA AVX are used in virtually all types of electronic products, including those in telecommunications, automotive, transportation, energy harvesting, consumer electronics, military/aerospace, medical, computer, and industrial markets.

KYOCERA AVX's electronic component products include ceramic and tantalum capacitors, film capacitors, varistors, filters, passive and active antennas, and other components manufactured

in our facilities throughout the world and components manufactured by other suppliers to KYOCERA AVX. KYOCERA AVX also manufacture and sell electronic connectors and inter-connect systems and distributes and sells certain electronic connectors manufactured by others.

KYOCERA AVX customers are multi-national original equipment manufacturers, independent electronic component distributors, and electronic manufacturing service providers. The Company markets its products through its own direct sales force and independent manufacturers' representatives, based upon market characteristics and demands.

KYOCERA AVX sells products to customers in a broad array of industries, such as telecommunications, information technology hardware, automotive electronics, medical devices and instrumentation, industrial instrumentation, transportation, energy harvesting, defense and aerospace electronic systems, and consumer electronics.

KYOCERA AVX has manufacturing facilities in North and Central America, Europe, and Asia.

## **General**

KYOCERA AVX requires that all its facilities in the United States or abroad are committed to the principles of freedom to work and basic human rights. It is strictly prohibited for any KYOCERA AVX operation to take or hold worker passports, visas, or other work documents. All workers are free to leave KYOCERA AVX employment at any time without hindrance or financial or other penalty.

To ensure compliance, KYOCERA AVX corporate personnel audit each facility at least annually. Further, KYOCERA AVX has implemented a variety of reporting or "whistleblowing" mechanisms to permit any KYOCERA AVX employee or Stakeholder (through our Report Misconduct webpage) to report any issue to the Corporate Compliance Officer which immediately triggers an investigation. All such reports are protected and retaliation for making such a report is strictly prohibited.

Among the practices that KYOCERA AVX strictly regulates at its facilities and by any organization that provides labor on a temporary or contract basis are:

- Workers may not be charged illegal or excessive recruitment fees.
- Workers must be clearly informed about terms of employment.
- When employment contracts are used, workers must be provided with understandable, legally compliant written contracts.
- No worker may be charged fees for travel, health checks, or work documentation.
- No worker may be subject to excessive or illegal wage deductions.
- No worker may be required to stay in company or broker-controlled housing.
- Workers must be able to enter or leave the premises freely.
- Workers will not be required to work excessive overtime.
- Worker identity documents may never be confiscated or withheld.
- Wage deductions may not be used as a disciplinary measure.
- Physically abusive or humiliating discipline and termination practices are prohibited.
- Worker's visa and work permit may not be tied to a single employer (except when required by local law (e.g., Malaysia);
- Monetary penalties or withholding of wages may not be imposed for early contract termination.

- If workers are not from the region of the facility, they will not be forced to pay for return travel to their home; and
- Workers may never be forced to pay financial deposits or "security" fees as "runaway insurance."

## **Risk Areas**

We consider the risks of modern slavery and human trafficking to be relatively low in our direct business operations as our direct workforce is largely comprised of professionally qualified or skilled personnel. However, we are aware that inherent and potential risks of modern slavery and human trafficking could be present in two high risk areas. First, on occasion, KYOCERA AVX uses employment agencies for temporary or contract workers. Second, KYOCERA AVX suppliers are located across the globe and can be difficult to monitor. As to the former, KYOCERA AVX is highly selective on the employment agencies with which it works and ensures that there are specific contractual clauses that address modern slavery issues. Further, KYOCERA AVX's internal compliance reporting system is available to all such employees to report any violations. As to the latter, KYOCERA AVX's procurement department determines which suppliers to physically audit as part of the overall compliance effort. All suppliers are reminded of the need to comply with [The KYOCERA AVX Supplier Code of Conduct and Sustainability Policy](#) and the RBA Code of Conduct as a condition of doing business with KYOCERA AVX.

## **KYOCERA AVX Policies**

The Management Rationale of the Kyocera Group is: "To provide opportunities for the material and intellectual growth of all our employees, and through our joint efforts, contribute to the advancement of society and humankind." We aim to realize this rationale by committing ourselves to the implementation of fair business activities in our supply chains. KYOCERA AVX, in harmony with The Kyocera Group, believe that the mutual prosperity of the entire supply chain can be ensured if all companies in the chain work together to meet the demands of society. To this end, we work together with suppliers to promote practices to fulfill our social responsibilities such as respect for human rights, fair labor practices, and environmental protection.

KYOCERA AVX promulgates and enforces several internal policies to ensure that it is conducting business in an ethical and transparent manner. These include:

- [Social Accountability Policy](#) requiring compliance with all aspects of that policy to support and respect human rights within the sphere of our influence and to ensure we are not complicit in human rights abuses. This policy also explains how employees can report any violations.
- HR policies governing recruitment, worker requirements, and anti-trafficking provisions.
- Whistleblowing mechanism and anti-retaliation policies which permit all employees and stakeholders to know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals and can, if they choose, do so anonymously through the [KYOCERA AVX Reporting](#)

[Misconduct](#) mechanism accessible internally and through the KYOCERA AVX public webpage.

- [KYOCERA AVX Code of Business Conduct and Ethics](#). This code explains the way we behave as an organization and how we expect our employees and suppliers to act.
- The [Kyocera Group Human Rights Policy](#) which is the overarching policy that clearly outlines our commitment, that through our management Rationale, efforts and actions we actualize a fundamental respect for human rights throughout the entire value chain and respect the human rights of all of our stakeholders as an absolute essential.
- Through our membership we support and align our standards to the spirit and intent of the [RBA Code of Conduct](#). Through this alignment we ensure our business operations are environmentally responsible and conducted ethically. Further, we expect our suppliers to align their business practices to the RBA Code of Conduct.

## **Suppliers**

KYOCERA AVX maintains policies applicable to all suppliers and maintains a preferred supplier list. KYOCERA AVX conducts due diligence on all suppliers before allowing them to become a supplier which includes screening to ensure that particular organization has never been convicted of offenses relating to modern slavery and either pre-approval or ongoing on-site audits of higher risk suppliers which include a review of working conditions. Compliance with our [KYOCERA AVX Supplier Code of Conduct & Sustainability](#) is mandatory for all suppliers. Failure to comply will allow KYOCERA AVX to terminate any relationship for breach and barring such supplier from doing business with KYOCERA AVX.

KYOCERA AVX maintains an open dialog with all suppliers to ensure their understanding and compliance with these requirements as well as engaging in a risk-based analysis to determine if audits or inspections are necessary.

## **Performance Indicators**

KYOCERA AVX determines the effectiveness of its program in several ways.

- The results of on-site monitoring of its own facilities and those of suppliers.
- The results and completeness of Supplier Assessment questionnaires and related scores using RBA Online assessment tools as a model.
- Intelligence gained about a supplier through contracting process and renewal.
- ISO Certifications or lack thereof.
- Monitoring of news reports and other information publicly available about its suppliers.
- Evaluation of any reports through the compliance reporting system; and
- Participation in industry or business groups such as the Responsible Business Alliance and implementation of best practices as recommended by such groups.

## **Future Efforts**

Eradicating slavery and human trafficking require strong action and collaboration from business, governments, international organizations, and society. KYOCERA AVX is committed to reviewing its approach to human rights on a regular basis to ensure compliance with all laws and regulations, including the California Transparency in Supply Chains Act of 2010 (effective January 1, 2012, the “California Act”) and the Modern Slavery Act 2015 (effective October 29, 2015, the “U.K. Act”), and with the fundamental human rights that these laws and regulations protect.

## **Approval for This Statement**

This statement pertains to all of KYOCERA AVX for our fiscal year starting April 1, 2022, and beyond. It has been specifically reviewed and approved by the Board of Directors of KYOCERA AVX Component Corporation, in accordance with the requirements of the U.K. Act.

Date October 1, 2022.

## **Karen Smith**

Senior Vice President, Global Human Resources and EHS,  
Chief Compliance Officer of KYOCERA AVX