

**Company Name** Amphenol  
**Industry** ICT (Own operations and Supply Chain)  
**UNGP Core Score (\*)** 4.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>4.5</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: The Company states in its Global Human Rights Policy that it is 'committed to respecting and promoting human rights in our relationships with our employees, suppliers and members of the communities within which we operate'. [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not met: UNGC principles 1 &amp; 2</li> <li>• Not met: UDHR</li> <li>• Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: In addition, it states that it 'further believe[s] in the principles stated in the UN Guiding Principles on Business and Human Rights.' However, 'to believe in' the Principles is not considered a formal statement of commitment according to CHRB wording criteria. [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a> &amp; Code of Business Conduct and Ethics, 29/01/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a>]</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: ILO Core: Although the Company commits to the RBA code on its website, it has its own code of business conduct and its own Human Rights Policy. Although the Company commits to 'not permit the use of child labor, forced or compulsory labor', no evidence found of statement of commitment to respect the rights of freedom of association, collective bargaining and no discrimination. [Code of Business Conduct and Ethics, 29/01/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a> &amp; Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: Explicitly list ALL four ILO for ICT suppliers: In its Supplier Responsible Policy, the Company 'sets forth standards to ensure that supplier working conditions are safe and that workers are treated with dignity and respect. These are the standards by which we expect our suppliers to conduct their businesses'. These standards include the following: No Forced Labor; 'The hiring of individuals under the age of fifteen (15) or the local legal minimum working age or under the age for completing compulsory education, whichever is higher, is prohibited'; No discrimination; 'respects the right of suppliers' workers to form and join labor unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, the Company indicates in its supplier Code of Conduct that suppliers shall not use forced or bonded labour, child labour, shall not discriminate, and 'In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' However, it is not clear whether the Company is respecting those rights in all contexts, as it indicates 'in conformance with local law'. [Supplier Code of Conduct, 10/2019: <a href="http://amphenol.com">amphenol.com</a> &amp; Supplier Responsible Labor Policy, 2020: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: The Company's Global Human Rights Policy reads: 'We [...] Do not permit the use of child labor, forced or compulsory labor in our operations or any of our suppliers'. In addition, in its COBC it indicates that 'It is the Company's intention to comply with all local Fair Labor Standards [...] including, but not limited to child labor, work hours, minimum wage, overtime, statutory benefits, and collective bargaining'. However it states 'intention</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to comply', which is not considered a formal commitment. Similar statement can be found in the sustainable business report. No evidence found of a formal commitment to respect the rights of freedom of association, collective bargaining and no discrimination. [Code of Business Conduct and Ethics, 29/01/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a> &amp; Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Respect H&amp;S of workers: The code of business conduct and ethics states that 'We also want to ensure a safe and healthy work environment for all of our employees. Amphenol employees must follow applicable safety and health laws and regulations of the countries and communities where we operate and related rules, regulations and procedures issued by the Company'. [Code of Business Conduct and Ethics, 29/01/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a>]</li> <li>• Met: H&amp;S applies to ICT suppliers: Amphenol states that it 'recognizes that a safe and healthy work environment enhances the quality of products and services' and that 'suppliers shall comply with applicable health and safety regulations and continually improve health and safety performance'. [Supplier Code of Conduct, 10/2019: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not met: working hours for workers: The Company states that 'It is the Company's intention to comply with all local Fair Labor Standards, Protective Labor requirements, Safety and Health Standards, including but not limited to child labor, work hours, minimum wage, overtime, statutory benefits, and collective bargaining.' However, no formal commitment was found. [Code of Business Conduct and Ethics, 29/01/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a>]</li> <li>• Not met: Working hours for ICT suppliers: The Company indicates that 'working hours are not to exceed the maximum set by local law', however, no formal commitment about respecting the ILO conventions on working hours was found. [Supplier Code of Conduct, 10/2019: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states: 'we integrate our commitment to respecting human rights worldwide into our operations and supply chains. As such, we: [...] Engage openly with stakeholders on issues that impact human rights'. [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with ICT suppliers to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: See indicator A.1.2. Companies are awarded this if they are committed either to the ILO Declaration (or each ILO Core area) or the UN Global Compact.</li> <li>• Met: Senior responsibility for HR: The Company states that it operates the Corporate Sustainability Group, which is 'led by our Director of Corporate Environmental, Health, Safety &amp; Sustainability (EHSS) and includes a team of subject matter experts from relevant functions such as, legal, purchasing, quality assurance, corporate sustainability programs, manufacturing and environmental health and safety. The Director of Corporate EHSS acts as the conflict minerals program manager. Senior management is briefed about the process and results on a regular basis.' In addition, in its Sustainability Report, there is a reference to the "Sustainable Steering Committee", a 'cross-functional sustainability steering committee is in place to drive Amphenol's sustainability efforts. The committee is comprised of representatives from legal, human resources, procurement, engineering and EH&amp;S'. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a> &amp; Sustainability Report 2019, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The sustainability working group is a team comprised primarily of corporate and business unit EH&amp;S and sustainability professionals focused on implementation of the Company's sustainability goals and initiatives and our operating units. As indicated above Corporate Sustainability group 'includes a team of subject matter experts from relevant functions such as, legal, purchasing, quality assurance, corporate sustainability programs, manufacturing and environmental health and safety. [Sustainability report 2016, 25/05/2017: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not met: Day-to-day responsibility for ICT in supply chain: The management system within its Corporate Sustainability Group communicates with suppliers and conducts relevant training and surveys. However, this evidence seems focused in conflict minerals context and suppliers. Not clear how suppliers general compliance for human rights is managed within the company. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: According to its Global Human Rights Policy, the Company 'Regularly assess human rights risks and impacts, tracking responses and communicating the results to senior executives and local operational managers'. However, no evidence found describing the process to identify potential human rights risks and impacts. [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not met: Identifying risks in ICT suppliers: Although the Company refers to the process to identify suppliers that fall in the category of conflict minerals, no further evidence suppliers of the Company describing a process to identify human rights risks in its supply chain. Conflict minerals issues are assessed in their own specific indicators. In addition, the Company indicates in its Sustainability Report: 'We took action in 2019 to improve our supply chain transparency and identify potential risks through a comprehensive supply-chain mapping exercise'. Although, the Company also reports that it 'routinely evaluate our suppliers on the quality and sustainability', no evidence found describing the process to identify risks in its supply chain as part of a due diligence process. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks: Although the Company discloses possible risks related to 3TG minerals in products could benefit armed groups in the Conflict Region, this is assessed in conflict minerals specific indicators.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in ICT supply chain</li> <li>• Not met: Example of Actions decided: Although the Company reports in the context of conflict minerals, this is assessed under its own specific indicators. No evidence found of examples of actions decided to human rights salient issues. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1</li> <li>• Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2</li> <li>• Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4</li> <li>• Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: Amphenol states that 'Employees are encouraged to talk to supervisors, managers or other appropriate Company personnel, including the Amphenol Legal Department, about observed or suspected illegal or unethical behavior and, when in doubt, about the best course of action in a particular situation. Employees, officers and directors who are concerned that violations of this Code or that other illegal or unethical conduct by employees, officers or directors of the Company has occurred or may occur, should contact either their supervisors or manager. If an employee does not believe it appropriate or are not comfortable approaching his or her supervisors or manager about his or her concerns or complaints, then he or she may contact the Amphenol Legal Department, the Audit Committee of the Board or call the hotline phone number posted on employee bulletin boards throughout the Company'. [Code of Business Conduct and Ethics, 29/01/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Met: Expect ICT supplier to have equivalent grievance systems: The Company states that 'Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation'. 'Suppliers utilizing sub-tier supplier, subcontractor or temporary labor agency shall ensure conformity to the COC [supplier code of conduct] as well'. [Supplier Code of Conduct, 10/2019: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community: The Company states in its Global Human Rights Policy that it provides 'access to grievance mechanisms allowing employees and suppliers to raise concerns or identify human rights issues or concerns.' However, it is not clear whether external stakeholders, such as local communities have access to these grievance mechanisms. [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects ICT supplier to have community grievance systems: The Company requires in its Supplier Code of Conduct: 'Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this SCOC and to foster continuous improvement.' However, no reference found to external stakeholders. [Supplier Code of Conduct, 10/2019: <a href="http://amphenol.com">amphenol.com</a> &amp; Supplier Responsible Labor Policy, 2020: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not met: ICT supplier communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

**Performance: Responses to Serious Allegations (Not included in the overall score)**

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Headline: Amphenol faces class action over alleged chemical contamination in Indiana</li> <li>• Area: Environmental damage &amp; human health impacts</li> <li>• Story: In December 2019, press outlets reported that a federal class action lawsuit had been filed in the US District Court of Indiana, seeking damages from Amphenol and other companies for alleged chemical contamination, which has been linked to rare child cancers in the area. The lawsuit alleges that the Company knew of contamination around the sites since the 1980s and that contamination around domestic properties has led to an increased risk of future illnesses. Residents reportedly want to be compensated for their loss of property value due to the pollution.</li> </ul> <p>The main contaminants are reported to be trichloroethylene, or TCE, and tetrachloroethylene, or PCE, both of which the Centers for Disease Control and Prevention lists as known carcinogens. EnviroForensics, hired by the city of Franklin, released a report in November 2018 which claims that sewer vapours of TCE and PCE were at levels hundreds of times the safe limits set by Indiana's environmental agency. A citizen organisation alleges that this chemical pollution is responsible for multiple cancer cases in Johnson County: nearly 60 children have been diagnosed with rare forms of blood and brain cancer in the last 10 years, and almost half are in Franklin.</p> <p>The US Environmental Protection Agency (EPA) determined that Bendix Corporation, which was purchased by Amphenol and operated in the location now known as the Amphenol site, directly dumped its chemical discharge into Franklin's sewers from the 1960s to '80s. The EPA and the Indiana Department of Environmental Management (IDEM) are overseeing the clean-up, but both deny a correlation between the levels of PCE and TCE found and local cancer cases. Amphenol is completing remediation works, for example installing systems at homes where chemical vapour concentrations exceed the safety levels.</p> <ul style="list-style-type: none"> <li>• Sources: [Daily Journal - 05/12/2019: <a href="http://dailyjournal.net">dailyjournal.net</a>][Indianapolis Star - 05/3/2019: <a href="http://eu.indystar.com">eu.indystar.com</a>][Indianapolis Star - 03/12/2019: <a href="http://jurangsumber.blogspot.com">jurangsumber.blogspot.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Public response available</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(1).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company's Business Code of Conduct and Ethics includes policy about the environment. [Code of Business Conduct and Ethics, 29/01/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The Supplier Code of Conduct also includes policy about the environment. [Supplier Code of Conduct, 10/2019: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question</li> </ul>
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>



## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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