

**Company Name** Amphenol  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score** 8.6 out of 100

Theme Score	Out of	For Theme
2.0	10	A. Governance and Policies
0.9	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
2.0	25	D. Performance: Company Human Rights Practices
1.7	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <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="https://www.amphenol.com">amphenol.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commitment to the UNGPs: In addition, it states in its Code of Conduct and Ethics that it is 'committed to the Universal Declaration of Human Rights, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work'. [Code of Business Conduct and Ethics, 02/02/2022: <a href="https://www.amphenol.com">amphenol.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: The Company states in its Code of Conduct and Ethics that it is 'committed to [...] the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work'. [Code of Business Conduct and Ethics, 02/02/2022: <a href="https://www.amphenol.com">amphenol.com</a>] &amp; [Global Human Rights Policy, N/A: <a href="https://www.amphenol.com">amphenol.com</a>]</li> <li>Not Met: Company has a 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 Diversity, Equity and Inclusion Policy, it states that: 'We believe everyone has the right to a safe and inclusive work environment, and as such, bias and discrimination against these characteristics and others is not tolerated at</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Amphenol'. Also, 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 'intention to comply' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found of a formal commitment to respect the rights of freedom of association. [Code of Business Conduct and Ethics, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>] &amp; [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: The Supplier Responsible Policy 'sets forth standards to ensure that supplier working conditions are safe and that workers are treated with dignity and respect'. These standards include the following: No Forced Labor; 'Child labor is not to be used in any stage of manufacturing.'; No discrimination; and with respect Freedom of Association and Collective bargaining, the document indicates: 'In conformance with local law, suppliers, their agents and/or sub-agents 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'. In these cases (reference to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supplier Responsible Labor Policy, 01/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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>• Met: Commitment to 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, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: 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, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: According to its Supplier responsible labor policy: 'Employees must be provided with a safe and healthy work environment which complies with applicable sanitation, safety and health laws, regulations, and company-specific requirements'. [Supplier Responsible Labor Policy, 01/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect Working hours the Company indicates in its Supplier Code: 'Working hours are not to exceed the maximum set by local law. All overtime must be voluntary. Further, workers shall be allowed minimum breaks and rest periods set by local law.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	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>• Met: Responsible mineral sourcing: The Code states that 'Amphenol is committed to ensure certain metals [...] are sourced responsibly. We work diligently to ensure that our products do not contain tantalum, tin, tungsten, or gold (3TGs), which may have been derived from ores extracted in conflict regions as defined by Section 1502 of the Dodd-Frank Act or extracted from Conflict Affected and High-Risk Areas (CAHRAs) as defined by the European Union Conflict Minerals Regulation'. In addition, in its Responsible Minerals Policy it indicates: 'As one facet of our global approach to respecting human rights, Amphenol has implemented a responsible sourcing program for certain minerals used in the manufacture of our products. Our program seeks to ensure that our products do not contain metals derived from</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conflict minerals'. [Responsible Minerals Policy, 06/2021: <a href="http://amphenol.com">amphenol.com</a>] &amp; [Code of Business Conduct and Ethics, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Based on OECD Guidance: Amphenol follows the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to develop appropriate assessment frameworks and management systems for establishing reasonable country of origin inquiry (RCOI) processes and due diligence'. [Responsible Minerals Policy, 06/2021: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Requires suppliers to commit to responsible mineral sourcing: In its Supplier Code of Conduct, the Company indicates: 'Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, cobalt, and mica in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Amphenol upon request.' However, the requirement does not directly address a commitment to responsible mineral sourcing, but a requirement to adopt a policy and exercise due diligence 'consistent with' the OECD Guidance, what is not considered a formal statement of commitment according to CHRB wording criteria. [Supplier Code of Conduct, 02/02/2022: <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 follow OECD Guidance for all minerals: In its Responsible Minerals Policy, the Company indicates: 'Amphenol is committed to evaluating its responsible minerals program to include metals beyond 3TG. In addition to the requirements of the current regulations, Amphenol has broadened its scope of minerals to include cobalt and will continue to assess additional minerals as relevant initiatives or drivers emerge'. The commitment to implement responsible sourcing for all minerals is still in process. [Responsible Minerals Policy, 06/2021: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Suppliers expected to make similar requirements of their suppliers</li> </ul>
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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: Women's rights</li> <li>• Not Met: Children's rights</li> <li>• Not Met: Migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect at least one of these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	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: The Company commits to remedy</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs)</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Board level responsibility for HRs: The Company states on its website: 'Amphenol's shared values to be ethical at all times, create a diverse workforce, empower our people, create a sustainable business and continue to innovate for customers is fully endorsed by our Board of Directors and Executive Management. Our corporate sustainability initiatives are supported and reviewed by Amphenol's Board of Directors.' Its Global Human Rights Policy is included in its Sustainability section: 'Environmental, Social and Governance. [Governance - website, N/A: <a href="https://sustainability.amphenol.com">sustainability.amphenol.com</a>] &amp; [Sustainability, N/A: <a href="https://amphenol.com">amphenol.com</a>]</li> <li>Not Met: Describe HR expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Board/Committee review HRs strategy</li> <li>Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Incentives for at least one board member</li> <li>Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Performance criteria made public</li> <li>Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Board process to review business model and strategy</li> <li>Not Met: Describe frequency and triggers for reviewing</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Example of actions decided</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>Met: Senior responsibility for HR implementation and decision making: 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="https://amphenol.com">amphenol.com</a>] &amp; [Sustainability Report 2019, 2019: <a href="https://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: How it assigns Day-to-day responsibility: The company states, on its Sustainability Report 2020, that: "The coordination of onsite safety programs, resources, reporting and training is conducted locally by our EHS&amp;S and human resources staff to ensure these programs are properly communicated and understood. In addition, a number of our operations employ safety committees and management systems, including ISO 45001, in order to promote a safe working environment. Our corporate EHS&amp;S team works closely with our local teams to ensure our facilities are operating safely. We also track employee training hours at a corporate level through our internal reporting system. We believe that this model of tracking at the corporate level, but administering at the local level, has allowed us to provide training and supervision that better fits the needs of our workforce." [Sustainability Report 2020, 2021: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: In its Annual Report 2019, the Company includes the following risk among its identified 'Risk Factors': 'The Company is currently engaged in, or subject to, various customer claims, litigation and other regulatory and legal matters and may be subject to additional claims, litigation and other regulatory or legal proceedings in the future. Such matters expose the Company to risks that could be material, including but not limited to, risks related to employment disputes, tax controversies, government investigations, intellectual property infringement, compliance with environmental laws, unfair sales practices, product safety and liability, [...]'. However, no evidence found whether human rights issues are included in the enterprise risk management. [Annual Report 2019, 04/2020: <a href="http://staphsustainability.blob.core.windows.net">staphsustainability.blob.core.windows.net</a>]</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder: The company states, on its Supplier Code of Conduct: "The SCOC establishes minimum standards to which Amphenol expects each of its Suppliers to adhere. The SCOC is based on the RBA Code of Conduct, but also reflects additional Amphenol requirements. Amphenol expects its Suppliers (and their respective employees, subcontractors, and suppliers) to ensure the requirements of the SCOC are met within their supply chains." However, no further information on how the communication of the policy to communities and other stakeholders is done. [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain</li> <li>• Not Met: Requires suppliers to communicate policy requirements: The Company indicates in its Sustainability Report: 'To ensure that our suppliers are acting in a manner consistent with our values and standards, we have been expanding our outreach and engagement on our Supplier Code of Conduct. As part of these actions, we have published a new Supplier Responsible Labor Policy which sets forth the standards we expect our supply chain to uphold to ensure that supplier working conditions are safe and that workers are treated with dignity and respect.' In addition, it states in its Supplier Responsible Labour Policy: 'This Supplier Responsible Labor Policy sets forth standards to ensure that supplier working conditions are safe and that workers are treated with dignity and respect. These</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>are the standards by which we expect our suppliers to conduct their businesses. [...] we expect our suppliers to uphold the requirements set forth in this Supplier Responsible Labor Policy and to ensure these standards are met within their supply chains'. However, no details found on how the Company has communicated this new Policy to its suppliers. [Supplier Responsible Labor Policy, 01/2022: <a href="http://amphenol.com">amphenol.com</a>] &amp; [Sustainability Report 2019, 2019: <a href="http://amphenol.com">amphenol.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2.a</li> <li>• Not Met: How workers are trained on HR policy commitments: The Company states in its Global Human Rights Policy: '[...] we: [...] Conduct on-going training and assessments of Amphenol's operations globally to avoid human rights violations.' However, no further information found regarding the training on how employees received or are receiving this training. [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Met: Trains relevant managers including procurement: The Company reports in its MSA Statement: 'In 2019, Amphenol deployed training on human trafficking and slavery to all relevant employees and managers in each of our operations who have direct responsibility for supply chain management and for recruitment of new employees'. [Anti-Human Trafficking and Slavery Statement FY 2019, 2019: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment: In the company's Supplier Code of Conduct, the company requires its suppliers to train their employees, but no information found on how the Company helps its suppliers to meet the company's HR commitments. [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain</li> <li>• Not Met: Proportion of supply chain monitored</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective action process</li> <li>• Not Met: Disclose findings and number of corrective action</li> </ul>
B.1.7	Engaging and terminating business relationships	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: HR affects selection of suppliers</li> <li>• Not Met: HR affects on-going supplier relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	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: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates: 'As part of our ongoing efforts in this area, we plan to map out our stakeholders in 2020 and engage with them or, where that is not possible, with proxy stakeholders to help further prioritize our material sustainability areas of focus. Through our engagement processes, we aim to pay extra attention to potentially vulnerable populations within our broader stakeholder groups, such as migrant workers, women, youth, the disabled and indigenous peoples.' However, the process is still to be carried out. No evidence of work in progress found. [Sustainability Report 2019, 2019: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Met: Provides two examples of engagement with stakeholders: The company states: "We want to ensure that our sustainability strategy is focused on the most important ESG issues facing our business. In order to meet this objective, over the past five years, we've engaged with our stakeholders through periodic materiality</li> </ul>

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			<p>assessments to identify the ESG issues they perceive as being the most important to Amphenol's business. The outcome of these discussions and assessments has provided valuable perspectives to inform our sustainability strategy and reporting. In 2020, we began a new and more comprehensive materiality assessment which is currently underway. This formal assessment is being conducted by a third-party sustainability consultant and will help us identify where we can provide the most value to our stakeholders as well as provide direction on integrating ESG strategies into our business. Using GRI and SASB as the two primary frameworks, coupled with insights from leading industry associations and initiatives such as the Responsible Business Alliance (RBA), we compiled a set of industry-relevant, company specific ESG topics to assess. Our process follows GRI's stakeholder inclusiveness principle." [Sustainability Report 2020, 2021: <a href="http://amphenol.com">amphenol.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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 through relevant business relationships: 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: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing 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: Describe process for assessment of HR risks and discloses salient HR issues</li> <li>• Not Met: How process applies to supply chain</li> <li>• Not Met: Public disclosure of the results of HR assessment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describe challenges to effective comms and how it is working to address them

### C. Remedies and Grievance Mechanisms (20% of Total)

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	The individual elements of the assessment are met or not as follows: Score 1 • 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, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a> ] Score 2 • Not Met: Channel is available in all appropriate languages and workers aware: On Amphenol's "Contact Us" website, the language is exclusively in American English, that is, to be able to understand what is asked on the website, a person who does not speak this language would have to translate it on their own. [Contact Us   Amphenol, N/A: <a href="http://amphenol.com">amphenol.com</a> ] • Met: Describe how workers in the supply chain have access to grievance mechanism: 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, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a> ] • Met: Expect Suppliers to convey expectation to their own suppliers: 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, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a> ]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 • 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> ] Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers: 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, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a> ] & [Supplier Responsible Labor Policy, 01/2022: <a href="http://amphenol.com">amphenol.com</a> ]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Response timescales and how complainants will be informed: Although the company makes evident that there is a complaints channel available to its employees, the issue of response time, support, etc. is not specified in any document found. [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>Not Met: Describe support (technical, financial, etc) available for equal access by complainants</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>Not Met: Escalation to senior/independent level</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public statement prohibiting retaliation: The Company states 'Amphenol will not permit retaliation of any kind against good faith reports or complaints of violations of this Code or other illegal or unethical conduct.' [Code of Business Conduct and Ethics, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>Not Met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company states that 'Programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.' The Code also states 'Suppliers shall ensure conformance to the SCOC in all their business dealings. Suppliers utilizing a sub-tier supplier, subcontractor or temporary labor agency shall ensure their conformity to the SCOC as well.' However, it is not clear if this commitment is extensive to suppliers' external stakeholders generally. [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Complainants not asked to waive rights</li> <li>Not Met: Company does not require confidentiality provisions [Code of Business Conduct and Ethics, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Will work with state based non judicial mechanisms</li> <li>Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Describes how remedy has been provided</li> <li>Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Number grievances filed, addressed or resolved and outcome achieved</li> <li>Not Met: How lessons from mechanism improve management system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Pays living wage or sets target date: 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 evidence found of living wage target and a timeframe to achieve it. [Code of Business Conduct and Ethics, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how living wage determined</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Paying living wage</li> <li>• Not Met: Definition of living wage reviewed with unions</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Discloses living wage requirements in supplier code or contracts: The company states: "Worker compensation shall comply with local wage laws, including but not limited to minimum and overtime wages, overtime hours and legally mandated benefits." However, local wage laws do not always provide for a living wage. [Supplier Responsible Labor Policy, 01/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Improving living wage practices of suppliers</li> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The company states: "Amphenol defines its Tier 1 Direct suppliers as those who provide raw materials and goods for production and with which we have direct transactional business." However, it does not provide information for indirect suppliers. [Sustainability Report 2021, 2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why: The company makes the Direct Supplier Geographies available. However, it does not provide information on indirect suppliers. Furthermore, it does not disclose names and specific location of the direct or indirect suppliers. [Sustainability Report 2021, 2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company states that it does 'not permit the use of child labor, forced or compulsory labor in our operations or any of our suppliers.' [Global Human Rights Policy, N/A: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Age verification of workers recruited</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Remediation if children identified</li> </ul>
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: Its Supplier Code of Conduct indicates: 'Suppliers shall not use child labor'. This Code is part of the contractual agreement with the Company's suppliers. In addition, the it says 'Suppliers shall not use child labor. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Participants shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.' [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessement of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Job seekers and workers do not pay recruitment fee</li> <li>• Not Met: Commits to fully reimbursing if they have paid</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The company indicates in its supplier Code of Conduct that 'Suppliers shall not use forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons...Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.' [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Pays workers in full and on time</li> <li>• Not Met: Payslips show any legitimate deductions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The company states: "Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Disciplinary wage reductions shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law." [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Does not retain documents or restrict movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company indicates that suppliers are expected to adhere to the requirements in its Supplier Code of Conduct which states 'All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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 not to interfere with union rights / Steps to avoid intimidation or retaliation</li> <li>• Not Met: Discloses % total direct operations covered by collective CB agreements</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA &amp; CB rules in codes or contracts: The Company indicates in its Supplier Code of Conduct: '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. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment'. However, it is not clear whether the Company is requiring to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases, companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supplier Code of Conduct, 02/02/2022: <a href="https://www.amphenol.com">amphenol.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	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>• Met: Describes process to identify H&amp;S risks and impacts: The company states: "Health, Safety and Well-being - The safety and well-being of our employees is critical to our successful operation. Our health and safety activities are overseen by our corporate environmental, health, safety and sustainability leadership team but are managed by our local teams, who coordinate on-site safety programs, resources, reporting and training in our facilities. We believe that this model of coaching and tracking at the corporate level, but administering at the facility level, has allowed us to provide training and supervision that better fits the local needs of each of our workforces. During the COVID-19 pandemic, we have taken additional actions to protect the physical and mental health and well-being of our employees throughout the world, including in particular those employees who work in our factories. We have also encouraged employees to work from home when possible and appropriate and have taken an integrated approach to helping our employees optimally manage their work and personal responsibilities." [Annual Report 2020: <a href="https://s21.q4cdn.com">s21.q4cdn.com</a>]</li> <li>• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The company reports its lost-time Accident in its Sustainability Report for the last three years. It reported a '0.37 lost time injury rate for 2021 in comparison to 0.47 in 2019.' [Sustainability Report 2020, 2021: <a href="https://www.amphenol.com">amphenol.com</a>]</li> <li>• Met: Discloses Fatalities for last reporting period: The Company reports no fatalities for the past three years. [Sustainability Report 2020, 2021: <a href="https://www.amphenol.com">amphenol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Occupational disease rate for last reporting period</li> <li>• Not Met: Set targets for H&amp;S performance</li> <li>• Not Met: Met targets or explain why not or what is doing to improve management systems</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	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>• Met: Sets out clear Health and Safety requirements: The Company indicates that suppliers are expected to adhere to the requirements in its Supplier Code of Conduct which sets out Health and Safety expectations on subjects including: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food and Housing; Health and Safety Communication. [Supplier Code of Conduct, 02/02/2022: <a href="https://www.amphenol.com">amphenol.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period</li> <li>• Not Met: Fatalities disclosures for lasting reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Process to stop harassment and violence against women</li> <li>• Not Met: Working conditions take account of gender</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Respects max hours, min breaks and rest periods in its own operations</li> <li>• Not Met: Assesses ability to comply with its commitments when allocating work/targets</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How it implements and checks this in its operations</li> </ul>
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Working hours in codes or contracts: The Company indicates in its Supplier Code of Conduct: 'Working hours are not to exceed the maximum set by local law. Further, workers shall be allowed minimum breaks and rest periods set by local law.' However, no reference found to international standards or regular work week hours and minimum breaks. [Supplier Code of Conduct, 02/02/2022: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on working hours</li> <li>• Not Met: Assessment of number affected by excessive working hours</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company states that its commitment includes encouraging suppliers to establish policies, due diligence frameworks, and management systems consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas. However no evidence found of the Company incorporating this requirement into commercial contract / written agreement with suppliers. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Works with smelters/refiners and suppliers to build capacity: The Company states that it strives 'to enhance supplier communication, engage with certain suppliers to build supplier capability for conflict minerals supply chain traceability, and communicate training and escalation processes to improve due diligence data accuracy and completion.' However, no further details found, including capacity building of smelters/refiners. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Contractual requirement to disclosure smelter/refiner information: The Company states that it sent requests for information about the source of 3TG contained in the components supplied. However it does not incorporate into commercial contract / written agreement with suppliers. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Contractual requirement covers all minerals</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	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: Risk identification and disclosure in line with OECD Guidance: The Company states that 'will continue to seek to identify cost effective methodologies and to monitor practices used by other companies and industry associations to enhance visibility to subsequent tiers of the supply chain'. It states that 'because of our size, the breadth and complexity of the raw materials and components used in our products, and the constant evolution of our supply chain, identifying actors upstream from our direct suppliers is a challenge'. See below description of how it identifies smelters or refiners that pose risk. No further information found, including disclosure of risks. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Met: Identification of smelter/refiners and OECD Guidance: The Company indicates the following: 'Each individual operating unit in the Company evaluated its product lines to determine whether it manufactured or contracted to manufacture products for which 3TG are necessary to functionality or production. Then, with respect to the related procurement of materials or components containing 3TG, each individual operating unit conducted its own reasonable country of origin inquiry ("RCOI"). Thus, each operating unit identified its suppliers, narrowed the group of relevant suppliers to those providing materials or supplies that could potentially contain 3TG, and then, utilizing the Gensuite platform and service, interfaced with those suppliers to conduct a RCOI. To assist with completion of this task, management and key product stewardship personnel of each of these groups were given RCOI materials prepared with reference to the OECD Guidance and we held internal training sessions delivered by the internal team regarding our RCOI process. The operating units conducted outreach, training, and an extensive surveying project of our supply chain utilizing the Conflict Minerals Reporting Template (CMRT). Each operating unit reported the results of its surveying project to group management. Group management then provided certificates to Amphenol headquarters with the results of their inquiries.' [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>• Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company lists the validated smelters or refiners in its Conflict Minerals report. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Risk identification and disclosure covers all minerals</li> </ul>
D.4.10.c	Reporting on responsible sourcing of minerals	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>• Met: Describes mineral risk management plan for supply chain: The Company states that to mitigate possible risk, it 'has continued to increase the resources committed to supply chain due diligence efforts. We strive to enhance supplier communication, engage with certain suppliers to build supplier capability for conflict minerals supply chain traceability, and communicate training and escalation processes to improve due diligence data accuracy and completion. To the extent we were to discover that any of our suppliers are sourcing from smelters or refiners that support conflict, Amphenol will work toward using alternate sources within a reasonable time frame'. The Director of Corporate Environmental, Health, Safety &amp; Sustainability leads the Sustainability Group which manages the compliance program. This management system includes a team of subject matter experts from relevant functions, such as legal, purchasing, quality, assurance, manufacturing and environmental health and safety. [Conflict Mineral Report 2019, 06/2020: <a href="http://amphenol.com">amphenol.com</a>]</li> <li>• Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> <li>• Not Met: Disclose better risk prevention/mitigation over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not Met: Risk management and response processes cover all minerals</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Environmental damage with human health impacts</li> <li>• Headline: Amphenol faces class action over alleged chemical contamination in Indiana</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. [Daily Journal, 05/12/2019, "UPDATED: Agencies attempt to ease public concern as lawsuit is filed": <a href="http://dailyjournal.net">dailyjournal.net</a>] [Indianapolis Star, 02/12/2019, "Second source of toxic chemicals in Franklin known for decades, but borders still unclear": <a href="http://jurangsumber.blogspot.com">jurangsumber.blogspot.com</a>] [Indianapolis Star, 05/3/2019, "New technology reveals how dangerous vapors may be entering Franklin homes": <a href="http://eu.indystar.com">eu.indystar.com</a>]</p>
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</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response</li> </ul>
E(1).2	The company has investigated and 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: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: According to the IDEM Amphenol conducted clean-up measures in the area. The company has also installed "sub-slab depressurization systems at homes where chemical vapor concentrations exceed the safety levels". [IDEM website, N/A, "Franklin Site Investigation": <a href="http://in.gov">in.gov</a>] [Indianapolis Star, 05/3/2019: <a href="http://eu.indystar.com">eu.indystar.com</a>]</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: Local residents have filed a class action lawsuit. This indicates that they are not considering the measures to be satisfactory remedy. [Daily Journal, 05/12/2019: <a href="http://dailyjournal.net">dailyjournal.net</a>]</li> <li>• Met: Remedy delivered: The clean up is being conducted.</li> <li>• Not Met: Independent remedy process used</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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