



STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

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Revision	Prepared By:	Reviewed by:	Approved by:	Date
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STATEMENT

KN Circet is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. As part of this commitment, we have adopted the Electronic Industry Citizenship Coalition's (EICC) Code of Conduct (the "EICC Code") as the KN Circet Supplier Code of Conduct to which we hold ourselves and our supply chain accountable. The KN Circet Supplier Code of Conduct prohibits the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. KN Circet considers each supplier's conduct vis-à-vis the KN Circet Supplier Code of Conduct when awarding and/or renewing business with the supplier.

KN Circet has also published our Human Rights and Global Labor Principles, which are based on international labor and human rights standards. These principles reinforce and strengthen our commitment to the rights of our employees, workers in our supply chain, and workers in the global community.

KN Circet has taken a variety of actions to verify the absence of forced labor, slavery, and human trafficking in our supply chain, including the following:

1. VERIFICATION AND RISK ASSESSMENT:

Internal assessment of supply chain risk based on international indices, supplier performance (e.g., audit and spot check results), and other indicators of supplier-specific risks. This risk assessment is conducted annually and incorporates data on human trafficking incidence from the U.S. State Department's annual "Trafficking in Persons Report," as well as other risk factors including human rights risk and country governance and accountability. Supplier-specific risk incorporates data regarding labor management systems, the demographics of the workforce, and the use of labor agents. More information on EMC's methodology is available under "Evaluating Supplier Site Risk" in KN Circet's Sustainability Report.

2. AUDITS:

On-site verification of EICC Code conformance through independent, third-party audits that are announced, as well as through spot checks conducted by KN Circet employees in-region. The third-party audits follow the EICC Validated Audit Process (VAP), which includes an assessment of the suppliers' policies and practices with regards to human trafficking risks and controls as well as their management and oversight of their own suppliers, with particular emphasis on any labor brokers. Spot checks assess a set of key social and environmental indicators, including indicators related to forced labor. We select supplier sites to audit and to spot check based on the verification and risk assessment described above. Additional detail and statistics on both audits and spot checks, as well as a discussion of findings and associated corrective actions, are available in "Monitoring and

Assessment” in the Supply Chain Social and Environmental Responsibility section of KN Circet’s Sustainability Report.

3. SUPPLIER CERTIFICATION:

- Certification from suppliers of compliance with all applicable laws, including those related to freely chosen employment, through the EICC Self-Assessment Questionnaire (SAQ). Supplier sites showing high risk on the SAQ are audited, and supplier sites demonstrating known risk factors for human trafficking are investigated with regard to those issues specifically and, depending on the outcome, may be audited as well.
- Acknowledgements of the KN Circet Supplier Code of Conduct from 100% of KN Circet’s Tier 1 and strategic Tier 2 direct suppliers. This industry-standard Code includes a substantive section on human trafficking. Compliance with the Code is also part of our standard contract language for all KN Circet vendors, and evaluated through the SAQs and audits referenced above.

4. INTERNAL ACCOUNTABILITY:

Internal accountability standards and procedures to help confirm that employees and suppliers meet KN Circet standards. This program is intended to ensure that KN Circet employees and suppliers are aware of and adhere to established standards and processes. Supplier accountability occurs through mechanisms ranging from audit corrective actions (see “AUDITS,” above) to supplier scorecards and quarterly business reviews. For more detail on how accountability is built into our work with suppliers, see “Business Integration” in the Supply Chain Social and Environmental Responsibility section of KN Circet’s Sustainability Report.

KN Circet also maintains corporate-wide accountability and grievance mechanisms (e.g., the KN Circet Ethics Hotline), which are available to both employees and external parties. For additional information, see the Governance section of KN Circet’s Sustainability Report.

5. TRAINING:

Training all KN Circet supply chain management professionals on the KN Circet Supplier Code of Conduct. This includes employees at all levels of the commercial and engineering supply chain organizations, and is conducted regularly through a variety of training approaches, from in-person, all-day workshops to online modules. Human trafficking is consistently covered as part of the training provided.



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KN Circet's Global Supply Chain Management organization has responsibility for implementing and monitoring compliance to all of the supply chain activities described above. Our focus on slavery and human trafficking is part of a larger effort to encourage supply chain transparency and accountability. We will not tolerate forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons by any KN Circet supplier or for any other purpose. For additional information describing the structure of KN Circet's direct materials supply chain and our supply chain responsibility program, see the Supply Chain section of KN Circet's Sustainability Report and the Sustainability section of KN Circet's website.