AVNET, INC. – FY24 REPORT ON MEASURES TO PREVENT FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS (CANADA)

Introduction

Avnet's executive management, in collaboration with Avnet's supplier management and procurement teams, is responsible for ensuring that our supplier management and procurement practices incorporate key sustainability factors, including the protection of human rights. Avnet is committed to responsible business conduct in all procurement and sourcing activities in accordance with its core values. Avnet selects its suppliers, manufacturers and vendors, in part, based on their shared commitment to Avnet's core values and the principle and standards of responsible sourcing specifically related to human rights. Avnet complies with international ethical and legal standards. We expect our suppliers, customers and vendors to operate in accordance with these standards.

Entity Information

This section outlines the legal and organizational details of the reporting entities, including their structure, registration, and reporting scope under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Parent Company: Avnet, Inc.

Canadian Subsidiaries:

- Avnet International (Canada) Ltd. (Ontario Corporation No. 1834270)
- Premier Farnell Canada Limited (Ontario Corporation No. 554426)

Fiscal Year: July 2, 2023 – June 29, 2024

Report Date: May 31, 2025

Joint Report: Yes

Entity Structure, Activities, and Supply Chains

Avnet, Inc. is a global distributor of electronic components and technology solutions. Its Canadian subsidiaries, including Avnet International (Canada) Ltd. and Premier Farnell Canada Limited, primarily import and distribute semiconductors, interconnects, passives, electromechanical components, and embedded systems.

Avnet's supply chain spans over 140 countries, with major sourcing regions including Asia, Americas, and Europe. The company works with a broad spectrum of suppliers and ships more than 218 billion units annually. Avnet's Canadian operations do not manufacture goods but rely on Avnet's global procurement, warehousing, and logistics infrastructure networks to fulfill customer needs.

Policies and Due Diligence Procedures

Avnet's policies are informed by global standards including the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the Responsible Business Alliance Code of Conduct. [Global Human Rights Policy, 2022]

Avnet has implemented a comprehensive set of policies for all subsidiaries to prevent and reduce the risk of forced labour and child labour in our own operations and supply chain including:

- Global Human Rights Policy, 2022

- Statement against modern slavery and human trafficking, 2022

- Supplier Code of Conduct (Avnet Supplier Code of Conduct, 2023

- Responsible Sourcing Policy (Direct & Indirect), 2024

- Conflict Minerals Policy (Responsible Minerals Sourcing Policy, 2023)

- Avnet Code of Conduct, 2023

Avnet's due diligence framework includes annual risk mapping, supplier onboarding procedures, supplier self-assessment, contractual clauses requiring compliance, and corrective action plans.

Remediation Measures

Avnet has a formal Response and Remediation Guideline for addressing violations of its human rights policies: [Avnet's Response and Remediation Guidelines for Violations of Avnet's Global Human Rights Policy, 2023]

Step 1: Investigate & Verify – Determine the nature of the violation and Avnet's connection to it.
Step 2: Corrective Action – Sanction involved parties and remediate harm to affected workers.
Step 3: Mitigate & Prevent Future Harm – Remedial and corrective measure to prevent future harm

Training

Avnet delivers annual compliance training to all employees (with limited exceptions), alternating between two core modules:

- Code of Conduct and Privacy/Security
- Anti-Corruption and Export Compliance

In 2023, the training cycle included the Code of Conduct and privacy/security, achieving a global completion rate of 99.2%

The Code of Conduct training includes content on:

- Recognizing signs of forced labour and child labour
- Understanding legal obligations and company policies
- Using internal and external reporting mechanisms (e.g., the Ethics Alertline)

Effectiveness Review

Avnet evaluates the effectiveness of its efforts to prevent and reduce the risk of forced labour and child labour in its Canadian operations through a structured, risk-based approach aligned with its global Code of Conduct and Canadian legal obligations.

Key Measures:

Training and Awareness: Avnet's biennial Code of Conduct training includes Human Rights, understanding legal obligations, and using internal and external reporting mechanisms. This training also incorporates awareness materials on ethical workplace practices.

Policy Implementation: Avnet has developed and implemented anti-forced labour and child labour standards, including a global Code of Conduct, Supplier Code of Conduct, and Global Human Rights Policy. These are applied across its operations, including Canada, and are reinforced through employee awareness and internal training.

Grievance Mechanisms: Avnet maintains a global Ethics Alertline, available 24/7 in multiple languages, allowing employees and third parties including those in Canada to report concerns anonymously. This mechanism is supported by a network of trained Code of Conduct Advisors and is a key component of Avnet's global grievance system.

Child Protection: Avnet's policies explicitly prohibit child labour and include expectations for suppliers and employees to uphold child protection standards. These are embedded in both internal policies and supplier expectations.

Monitoring and Oversight: The Ethics and Compliance Office (ECO) reviews all reported concerns and oversees investigations. Significant matters are escalated to the Technology and Risk Committee. Effectiveness is further supported by internal audits, policy reviews, and quarterly reporting to the Board.

Continuous Improvement: Avnet applies a five-step continuous improvement framework includes goal setting, KPI measurement, evaluation, corrective action planning, and implementation to assess and enhance its human rights and compliance programs, including those relevant to Canadian operations.

Other Jurisdictional Reporting

Avnet is subject to similar reporting requirements in other jurisdictions:

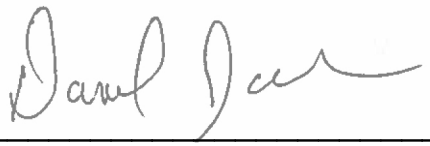
- United Kingdom and Australia: Modern Slavery Act

- Germany: Supply Chain Due Diligence Act (LkSG)

- Norway: Transparency Act (Åpenhetsloven)

Attestation

This report has been reviewed and approved by a Director of Avnet, Inc. and is hereby attested to be true, accurate, and complete in accordance with Section 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Signed: 

Darrel Jackson / VP, Corporate Secretary, Avnet, Inc. Date: September 10, 2025

Accessibility

The report will be:

- Published in a prominent location on Avnet's website www.avnet.com

- Submitted to the Minister of Public Safety and Emergency Preparedness via the designated portal

10. References

Global Human Rights Policy

Statement Against Modern Slavery and Human Trafficking

Supplier Code of Conduct

Conflict Minerals Policy (Responsible Minerals Sourcing Policy)

Declaration of Principles of Human Rights

Avnet Corporate Social Responsibility page

Avnet Global Environmental Policy

Avnet Global Human Rights Policy

Avnet Global Responsible Value Chain page

Avnet Policies on Environmental, Ethics and Compliance, Human Rights, Responsible Sourcing, Workforce and others

Avnet Statement against modern slavery and human trafficking

Avnet Report on the LkSG (Official BAFA Report, German)

Avnet Report on the Transparency Act (Official report, Norwegian | published version is identical to the signed version, which can be sent on request)