

Political Contributions and Activities Policy

1 Policy Statement

Avnet supports the right of its employees to participate in the political process, but only in their individual capacity, on their own time and at their own expense, and not as employees or representatives of Avnet.

Avnet does not contribute to political or political campaigns or parties, except as permitted by applicable laws and authorized by the Chief Legal Officer of the company.

The laws that apply to political contributions and activities are complex. Serious financial penalties, negative publicity and criminal prosecution can result from violation of those laws.

2 Scope

This is a global policy and applies to all employees and agents of Avnet, Inc. and its subsidiaries and affiliates.

3 Policy Details

- 3.1 No employee may (directly or indirectly) make a political contribution of any kind on behalf of Avnet.
- 3.2 Avnet does not (directly or indirectly) make political contributions to government officials, political parties or candidates in any nation other than the United States
- 3.3 Avnet will not (directly or indirectly) make political contributions within the United States, unless permitted by applicable law, authorized by the Chief Legal Officer and not done to influence a governmental act or decision to assist Avnet in keeping existing business, obtaining new business or obtaining preferential treatment for which Avnet is not otherwise entitled.
- 3.4 Avnet does not (directly or indirectly) make political contributions to government officials, political parties, or candidates in any nation other than the United States.
- 3.5 Avnet will not reimburse employees for any political contributions the employees made or intend to make.
- 3.6 Neither Avnet nor anyone acting on Avnet's behalf may make political contributions in the name of another individual, company, or any other third party.
- 3.7 Neither employees nor agents may (a) solicit political contributions from co-workers during business hours or at Avnet facilities or events or (b) use Avnet's assets or resources in connection with political activities. Nothing in this policy prohibits employees from engaging in political activity protected by local law.