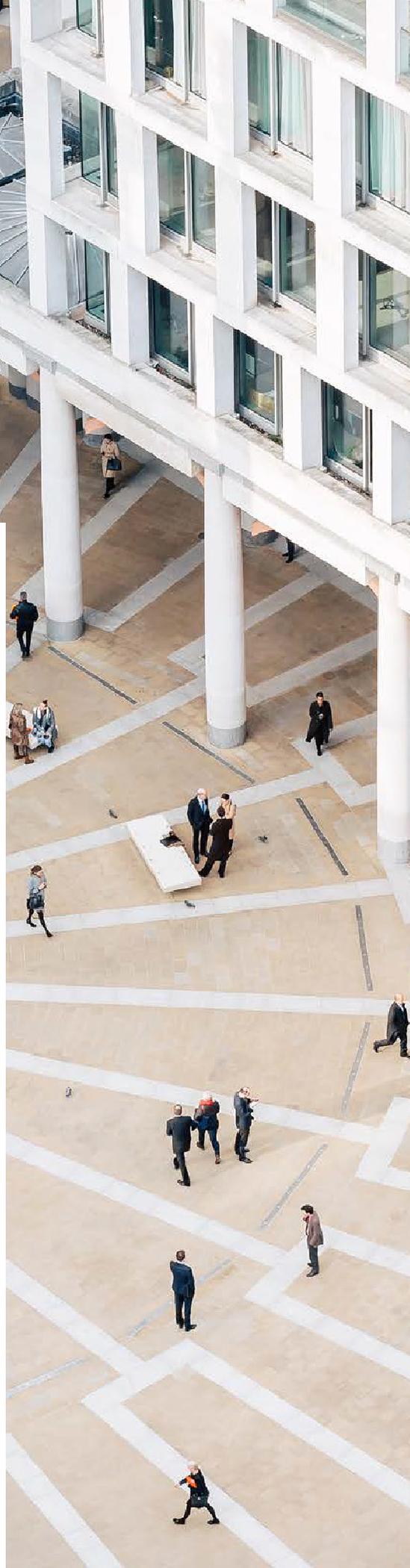




# Worldwide Code of Business Conduct and Ethics





Today's innovators to a better tomorrow is a big responsibility, and it's one we count on doing the right way.

# Worldwide Code of Business Conduct and Ethics

Though technologies and the industries we serve have changed over the years, how we do our work will always be built on Arrow's core values, which include business ethics, honesty, courage in dealing with others, personal accountability, and a relentless passion for the highest standard of service.

Arrow's Worldwide Code of Business Conduct and Ethics (the "Code") is our guide for living these values at Arrow, while also following the laws that govern our global operations. It outlines what we believe in and what we expect from all who represent the Company.

Thank you for your continued commitment to our shared team values. Helping innovators create a better tomorrow is a big responsibility, and they are counting on us to do it the right way.

Sean J. Kerins  
President and Chief Executive Officer



*Sean J. Kerins, President and Chief Executive Officer*

# Table of Contents

|  |    |
|--|----|
| Using Arrow's Code of Conduct.....                                       | 6  |
| Speaking Up.....   | 7  |
| Speaking Up is the Right Way.....  | 7  |
| Arrow's AlertLine .....  | 7  |
| Open Door Policy and Other Reporting Channels.....                       | 8  |
| Investigations .....   | 8  |
| Treating People with Respect.....  | 8  |
| Welcoming All Perspectives.....  | 8  |
| Discrimination and Harassment .....                                      | 8  |
| Safe Work Environment .....  | 9  |
| Upholding Social and Environmental Responsibilities.....                 | 10 |
| Environmental.....   | 10 |
| Human Rights.....  | 10 |
| General Labor Principles .....   | 10 |
| Forced and Child Labor.....  | 10 |
| Demonstrating Business Integrity.....                                    | 11 |
| Anti-Bribery and Anti-Corruption Laws .....                              | 11 |
| Use of Third Parties .....   | 11 |
| Global Trade Laws.....   | 11 |
| Antitrust and Fair Competition .....                                     | 12 |
| Insider Trading.....   | 12 |
| Conflicts of Interest .....  | 13 |
| Gifts and Entertainment .....  | 13 |
| Engaging in Political Activities .....                                   | 14 |
| Political Contributions and Campaigning.....                             | 14 |
| Lobbying.....  | 14 |
| Protecting Assets Entrusted to Us.....                                   | 14 |
| Integrity of Business Records .....                                      | 14 |
| Physical Assets and Intellectual Property.....                           | 15 |
| Confidential Information .....   | 15 |
| Safeguarding Personal Data .....   | 15 |
| Cybersecurity.....   | 16 |
| Artificial Intelligence .....  | 16 |
| Communicating Responsibly.....   | 16 |
| Social Media .....   | 16 |
| Communications with the Public, Investors, and Government Officials..... | 16 |
| Questions, Problems, and Reporting Violations .....                      | 17 |
| Confidential Reporting on Arrow's AlertLine.....                         | 18 |
| Confidential Reporting on Arrow's AlertLine.....                         | 18 |
| Are You Five Years Out? .....  | 19 |



# Using Arrow's Code of Conduct

The provisions of this Code are derived from and respect internationally recognized standards including:

- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Fundamental Conventions
- UN Universal Declaration of Human Rights
- UN Convention Against Corruption

Arrow's Worldwide Code of Business Conduct and Ethics (the "Code") applies to all employees of Arrow and all of its subsidiaries, including our officers and directors. We expect that anyone acting for, or on behalf of Arrow or any of its subsidiaries ("Company"), conduct all Arrow business with integrity and according to the letter, spirit and intent of all applicable laws and this Code.

Each year, we ask Arrow's Board of Directors and all Arrow employees to certify that they have read and understood the Code, and that they will follow the rules outlined within.

Employees business decisions and behavior should be guided by the Code, as well as the ethical values the Code exemplifies. While the Code provides guidance on a wide scope of topics, it cannot address every ethical question or situation that may come up on a day to day basis. When faced with an ethical decision, employees should ask:

- Is my decision consistent with all applicable laws and regulations?
- Is my decision fair, honest, and consistent with the spirit and principles set forth in the Code and other Arrow policies?
- If called upon, would I be comfortable explaining my decision to my co-workers, managers and the general public?
- Will my decision advance the Company's goals and objectives or would it have a negative impact on Arrow?

**Q.**

As a manager do I have any additional responsibilities under the Code?

**A.**

Yes! As a manager, you have added responsibilities to:

- Promote compliance with the Code among your direct reports, both by example and by direction;
- Foster and reward a culture of accountability and integrity;
- Enforce the Code consistently;
- Make sure appropriate compliance controls are implemented in your department or organization;
- Encourage employees to report issues in good faith;
- Ensure that the Company's zero-tolerance stance on retaliation against whistleblowers who report in good faith is observed and strictly enforced; and
- Escalate reported, suspected, or known violations of this Code, Company policies, law, or other applicable regulations promptly and appropriately.

There are no exceptions to acting with integrity. If you are in doubt of your decision or have questions about the application of the Code to specific situations, seek clarification or guidance from your manager or through other resources outlined in this document.

If an employee has knowledge of a Code violation, they are expected to report it. See [Speaking Up](#) for more information on reporting. If you have questions relating to any of the policies described in the Code, please contact Global Legal and Compliance.

Violations of the Code may result in discipline, up to and including termination. If violations of the Code also violate any applicable laws, civil or criminal prosecution may apply.

For executive officers, a waiver of the Code must be approved by the Audit Committee of the Board of Directors and must be disclosed to the extent required by law or regulation.

## Speaking Up

### Speaking Up is the Right Way

Having integrity means speaking up when a situation, behavior, or conduct doesn't seem right or seems inconsistent with the Code, Company policy or guideline, or applicable law. Anyone can speak up, ask questions, and report concerns through any of Arrow's reporting resources. Discouraging or interfering with access to Arrow's escalation channels is strictly prohibited.

Regardless of the type of report or the way in which it was reported, your identity (if you choose to provide it) will be treated confidentially and shared only with those who have a need to know. Any personal information that you have provided will be held and used to investigate the report, but only for such period as is reasonably necessary for this purpose. Thereafter, such information will be handled in accordance with Arrow policy and data privacy laws.

### Arrow's AlertLine

Reporting concerns allows Arrow to address any misconduct, ensure employee awareness of our policies and principles, and ultimately fosters a more positive work environment. Contact the AlertLine to seek advice or raise a concern about ethics, safety, compliance with laws, or Company policy. You may report anonymously, however, providing your name may help ensure that we have fully addressed your concerns.

Arrow's AlertLine is administered by an independent third-party and is available globally 24 hours a day, 7 days a week, in multiple languages. All questions and concerns are directed to appropriate resources for review and are handled in a professional and confidential manner.

Some countries' laws restrict the type and manner in which information may be reported through the AlertLine. If these laws apply to your location, an AlertLine representative will assist you with reporting in a manner that complies with your local laws. Country-specific guidance also is available through the Global Legal and Compliance site on Arrow's intranet.

**Q.**

I am aware of a potential Code violation, but it was committed by a manager. I can't afford to lose my job and would prefer to stay out of it. Is that okay?

**A.**

We all have a responsibility to report any potential violations of the law or of the Code. If someone is behaving inappropriately, regardless of their level within the organization, Arrow needs to know about it so that we can investigate and act accordingly. All reports are treated confidentially. Arrow does not tolerate retaliation, and you should contact Global Legal and Compliance if you feel like you are being retaliated against for making a report.

### AlertLine:

1-877-Code-ARW

<http://arrowalertline.arrow.com>

for dialing instructions or to submit via the web.



## Open Door Policy and Other Reporting Channels

Under Arrow's Open Door Policy, you may also raise concerns with your direct supervisor, a more senior leader in your reporting line, or anyone else in a management role. Human Resources also serves as a resource for receiving employee reports. Additional contacts for raising concerns, including Legal and Compliance, are listed in the [Questions, Problems and Reporting Violations](#) section of this Code.

## Investigations

We investigate reports of suspected misconduct promptly and properly. All employees are expected to fully cooperate in investigations. In order to protect employees' ability to cooperate, we maintain confidentiality to the fullest extent permitted by applicable law and take a strict stance against retaliation. Based on the findings of an investigation, remedial action may be appropriate to correct behavior, address process deficiencies, and prevent recurrence of violations.

**Retaliation against a person who speaks up about their concerns or participates in an investigation is a violation of this Policy.**

# Treating People with Respect

## Welcoming All Perspectives

We are committed to fostering a workplace that values and respects all employees. Employees are our greatest asset, and we recognize their contributions to our success. In keeping with the global nature of our Company and business, we seek to work in a way that is consistent with local cultures and business customs, so long as they do not conflict with this Code and applicable legal requirements.

## Discrimination and Harassment

Arrow is committed to equal opportunity for all qualified employees and job applicants. All employment decisions (such as hiring, discipline, terminations, promotions, and job assignments) are to be based on Arrow's needs and the employee's performance and potential. These decisions must be made without regard to a person's gender, race, color, national origin, age, religion, sexual orientation, physical or mental disability or any other characteristic protected by applicable law. Discrimination of any kind based on these personal characteristics, or others that may be prohibited by law, will not be tolerated.

All employees throughout Arrow are entitled to work and to attend work and work-related events in a professional atmosphere, free from violence and all forms of harassment, including sexual harassment.

Harassment is unwelcome conduct toward an individual based on any protected characteristic that has the purpose or effect of creating an intimidating, offensive work environment. It can take many forms, including physical actions, spoken and written remarks, circulation of sexually explicit or abusive pictures or other materials, sexual or derogatory jokes, and verbal abuse. Regardless of the form it takes, harassment negatively affects individual work performance and our workplace as a whole and is not allowed.

**DO:** Be respectful of different cultures. Treat others with respect, dignity and courtesy. Actions that may be considered harassment include:

- Offensive or inappropriate comments or jokes;
- Unwelcome physical contact or gestures;
- Verbal or physical threats of any kind;
- Inappropriate, explicit or derogatory pictures or texts;
- Sexual advances or requests for sexual favors; or
- Racial or ethnic slurs.

The principles in the Code apply equally to all employees regardless of where they are working around the world.

No one, at any level of the organization, may in any way threaten or imply that submission to, or rejection of, sexual advances will in any way influence decisions about employment, compensation, promotion, assignments, or any other condition of employment at Arrow.

**If you believe that you or another employee are being discriminated against or harassed, report it immediately.**

### **Safe Work Environment**

Safety is everyone's responsibility at Arrow. Maintaining that commitment demands that all of us understand and comply with all Arrow environmental, safety, and health policies and laws applicable to our jobs.

Acts or threats of violence interfere with our commitment to providing and maintaining a safe workplace. Any threatening behavior, even if made in a seemingly joking manner, must be taken seriously and reported immediately. If you or someone is in immediate danger, call local law enforcement authorities.

Use of illegal drugs, alcohol abuse, and the misuse of legal drugs create serious health and safety risks in the workplace. You may not possess, distribute, or be impaired by drugs while on Arrow premises or when conducting Company business.

Refer to Arrow's [Drug and Alcohol-Free Workplace Policy](#) for additional guidance.

**Q.**

What if one of Arrow's suppliers harasses an Arrow employee, would I need to report it?

**A.**

Yes. If you suspect that a co-worker is being harassed, you should report it to your manager or to the resources listed in this policy.



# Upholding Social and Environmental Responsibilities

We strive to improve the quality of life in the communities where we live and work, and we encourage employees to support their communities through volunteerism and through charitable giving. We are committed to conducting business in an environmentally responsible manner. We promote responsible decision-making throughout our businesses and broader value chain.

## Environmental

We use energy efficiently, seek to employ technology to minimize any risk of environmental impact, and commit to reducing our greenhouse gas emissions in the fight against climate change. We all have a responsibility to make sure that Arrow business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

Refer to our [Environmental, Social, and Governance \(ESG\) report](#) for additional detailed information on our efforts.

## Human Rights

Arrow conducts business in a manner that respects the rights of all people, including those of employees, contractors, workers in our supply chain, and others outside our organization who are impacted by our operations.

## General Labor Principles

We believe that direct communication between management and employees is the most efficient and effective way to identify and resolve workplace issues. Arrow respects employees' rights to engage in protected activities, including lawful free association, organization and collective bargaining, as well as the right to refrain from such activities. Arrow complies with applicable laws on labor relations and does not engage in unfair labor practices, such as obstructing employees' legal rights to representation or collective action. No provision in this Code of Conduct is intended to limit or obstruct the exercise of legal rights to employee representation or collective bargaining.

We provide wages and working hours for our employees in accordance with applicable law, and we expect the same of the parties with whom we do business.

## Forced and Child Labor

Arrow does not tolerate trafficking in human beings, or forced, bonded, indentured, involuntary, or any other form of exploitative labor in our operations or in our supply chain. Arrow prohibits the use of child labor and complies with the minimum age requirements in the jurisdictions in which we operate.



# Demonstrating Business Integrity

## Anti-Bribery and Anti-Corruption Laws

As an international company, we follow the anti-corruption laws of every country where we do business, including the Foreign Corrupt Practices Act and the UK Bribery Act. These laws prohibit offering, providing or authorizing the payment of bribes of any kind for any reason.

Arrow has zero tolerance for any form of bribery or corruption. It is not acceptable to offer or give anything of value directly or indirectly to any party with whom we are doing business or seeking to do business with, whether governmental or private, in order to obtain or maintain business, or to gain an advantage. This includes excessive gifts, travel, meals, entertainment, contributions to a political party, and charitable contributions and sponsorships.

These rules apply to both direct and indirect activities of Arrow, our employees, and our agents. For example, you cannot make any payment to a third party if all or any part of the payment will be given to a person for a prohibited purpose.

Refer to Arrow's [Global Anti-Corruption and Anti-Bribery Policy and Guidelines](#) for detailed information on the types and amounts of gifts and entertainment that may be inappropriate.

## Use of Third Parties

We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. We expect them to conduct business pursuant to Arrow's Business Partner Code of Conduct. Due Diligence must be completed for those businesses that act as agents for Arrow, irrespective of the financial value of the contract or business relationship value.

Refer to Arrow's [Global Third-Party Risk Management Policy](#) for detailed information regarding proper due diligence and how to engage third parties.

## Global Trade Laws

Arrow delivers products, services and technology to customers and suppliers all over the world and must comply with import and export restrictions that apply to international trade.

Whether a product or technology may be exported from one country to another depends on many factors, such as the nature of the item, its countries of origin and destination, and its end use and end user. These laws apply to many aspects of Arrow's operations — not just shipping products. Exchanges of technical information across national boundaries, including e-mail and web access, are subject to trade controls. Some countries also control the release of technical information to foreign nationals within their borders.

Just as we are unable to trade with ineligible persons, entities, or countries, you may not ask a third party to take part in these activities on our behalf.

Refer to Arrow's [Trade Compliance Risk Management Policy](#) and additional trade compliance resources on Arrow's [Global Compliance intranet site](#) for additional guidance and information.

**Q.**

I am trying to obtain necessary permits for a new warehouse that we are opening. The process normally takes six weeks, but the government official I am working with told me that for \$20, she could expedite the approval process and give me the permits tomorrow. May I pay her the \$20 fee?

**A.**

No, unless the fee is a government-authorized, government-collected, and transparent fee to legitimately expedite the permitting process. Otherwise, this is an example of a prohibited facilitation payment.

**DON'T:** Offer or accept bribes, kickbacks or any other kind of improper payment.

**Q.**

Is it okay that I don't know if my customer is an OEM, contract manufacturer or broker/trader, or the intended end use or destination of the products they buy from Arrow?

**A.**

No. You have an obligation to know your customer. This means understanding your customer's line of business, how they intend to use the products they purchase from Arrow and if the product will be exported to another country.

## Antitrust and Fair Competition

Arrow is committed to competing fairly and honestly and complying with competition laws. Antitrust and competition laws are designed to protect markets from anticompetitive behavior by prohibiting anticompetitive agreements such as price fixing and efforts to unfairly eliminate competitors.

In order to compete fairly and comply with these laws, we should never discuss with our competitors, even casually, issues affecting competition, such as:

- Dividing customers, markets or territories;
- What price to pay or charge, or other commercial terms;
- Advertising or promotions to offer;
- Restriction of output or supply of goods or services;
- Details about suppliers and customers;
- Bids; or
- Information regarding employee hiring practices.

Be particularly careful at industry association meetings or events to avoid even the appearance of unfair business practices. Customers, suppliers, and competitors must be dealt with fairly. Our commitment to fair dealing means that we provide only honest and truthful information to our business partners, suppliers, and competitors. We will not engage in any sort of illegal or unethical conduct when competing, including the abuse of market dominance.

Refer to Arrow's [Global Antitrust Policy](#) for additional guidance and information.

## Insider Trading

In the course of your job, you may learn material information about Arrow or other companies before it is made public. Information is "material" if a reasonable investor would consider the information important when deciding to buy, sell or hold a company's securities. In other words, if information is likely to affect a company's stock price, then it is material. For example, material non-public information may include:

- Advance notice of changes in senior management;
- Unannounced mergers or acquisitions;
- Nonpublic financial results; or
- Development of a significant new product.

All material non-public information regarding Arrow must be kept confidential. Arrow employees are prohibited from using "non-public" information for personal financial benefit or to "tip" others so they can make better investment decisions. If you have access to such information about Arrow, its customers, competitors, or suppliers, do not use or share that information for trading in stocks or for any other purpose except to conduct Arrow business. It is a serious violation of securities laws for an employee to provide non-public information to someone else – including family or friends. Arrow Board members, executive officers, and certain other employees have additional restrictions on trading in Arrow securities and should seek advice from Global Legal and Compliance before engaging in any trading activity.

Refer to Arrow's [Insider Trading Policy](#) for additional guidance and information.

**Q.**

My spouse manages a training consulting firm. Can the firm submit a proposal to become an Arrow vendor?

**A.**

Sending business to a family member can create a conflict of interest. Even though you know the work is high quality and provided at market rates, you should not be involved in a decision to select a family member for a business assignment.

This relationship would need to be disclosed to your manager prior to the proposal, and the proposal must be submitted and reviewed in accordance with the proper Request for Proposal process. You must refrain from participating in Arrow's discussions or relationship on this matter.

If you are or considering becoming a member of a board of directors or an advisory committee of an external organization, refer to Arrow's **Outside Board, Advisor, Service, or Role Policy** for additional information and guidance.

## Conflicts of Interest

Employees are responsible for acting in Arrow's best interest and avoiding situations where their own private interests either conflict or appear to conflict with Arrow's interests. Employees must disclose if they have a potential conflict of interest. While it is impossible to list all possible types of conflicts of interest, some examples include:

- Competing with Arrow, directly or indirectly;
- Profiting from a personal business transaction that involves Arrow, including self-dealing;
- Doing work for, or getting paid by, a supplier, customer or competitor of Arrow;
- Having a financial or other type of interest in a supplier, customer or competitor of Arrow (a shareholding of less than 3% in a publicly traded company is permitted);
- Conducting Arrow business with a family member or taking a business action which is intended to benefit a family member;
- Serving on the board of directors for an outside company, especially those that supply goods or services to Arrow or purchase our goods or services; or
- Dating or having a close personal relationship with a fellow employee if you are in a position to influence the terms or conditions of that person's employment or if that employee can influence the terms or conditions of your employment.

Employees have a duty to advance Arrow's interests and may not take for themselves, or others, business opportunities belonging to Arrow that have been discovered because of their position with Arrow.

If you find it difficult to make a fair and impartial business decision on behalf of the Company because of competing personal interests, you should immediately consult with your manager or Global Legal and Compliance. Some minor or potential conflicts may be acceptable if they are fully disclosed and approved by Global Legal and Compliance and Human Resources.

## Gifts and Entertainment

Business gifts and entertainment of reasonable value often build corporate goodwill and strengthen existing working relationships. Gifts and entertainment can create a conflict of interest and impair Arrow's ability to compete openly and fairly. You may not give or accept a business gift or entertainment if doing so would make it difficult, or appear difficult, for the recipient to make a fair and unbiased decision, or if its value exceeds commonly accepted business practices.

If you receive a gift that is not allowed by Arrow policy, return the gift to the giver. If it is not possible to do so, the gift should be turned over to Global Legal and Compliance for appropriate disposition.

In the case of government officials or employees of a state-owned enterprise (from any level of government), no entertainment or gifts may be offered, or travel expenses paid, without the written pre-approval of Global Legal and Compliance and your region's Chief Financial Officer, even if it is customary or a common practice in the country.

**Q.**

What should you do if you are offered a gift that you know is inappropriate?

**A.**

Politely refuse it and explain that Arrow policy prohibits you from accepting it. If you receive a gift without an opportunity to refuse it, consult with your manager or Global Legal and Compliance for guidance.

Some Arrow businesses may have more restrictive standards on gifts and entertainment. For more detailed information on the types and amount of gifts and entertainment that are appropriate, please refer to Arrow's **Global Travel and Expense Policy** and your local region or business gift policy.

## Engaging in Political Activities

Arrow does not support any specific political party but supports employees' personal rights to lawfully engage in the political process.

### Political Contributions and Campaigning

Involvement in a political campaign or making a contribution to a candidate is a personal decision. No Company funds, assets, services, time, equipment, or facilities may be contributed, whether directly or indirectly, to any politician, candidate for political office, political party, political action committee or political cause without the prior written approval of Arrow's Chief Legal Officer and Chief Executive Officer. This also applies to resources that may appear to be an endorsement or contribution.

If you hold, campaign for, or seek political office, you cannot give the appearance of acting or speaking on Arrow's behalf. If you wish to accept a political position while employed by Arrow, you will need to get Arrow's Chief Legal Officer's approval.

### Lobbying

Arrow strives to maintain a healthy and transparent relationship with governments around the world, by communicating its views and concerns to elected officials and policymakers where relevant to our business. It is Arrow's policy to adhere strictly to lobbying laws and regulations wherever it does business. The laws that regulate and define lobbying activities are various and complex. Generally, any contact with government personnel for the purpose of influencing legislation, regulations or decision-making may constitute lobbying. Retaining lobbyists or conducting lobbying activities for, or on behalf of, Arrow may only be conducted by authorized Arrow representatives, and with the prior approval of the Chief Legal Officer.

## Protecting Assets Entrusted to Us

### Integrity of Business Records

Our business records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to our operations. These records include any documentation created or used in the ordinary course of our business activities, whether in hard copy or digital. Our records are the property of Arrow and must be retained, stored, and disposed of in accordance with our [Global Retention Schedule](#).

Each of us has a role in ensuring that Arrow's books and records are accurate and that our system of internal controls is not circumvented. This includes ensuring the accuracy of any information we report, data we enter or document we generate. Intentionally entering any false, misleading or inaccurate data in any form anywhere in the Arrow system or requesting that a third party (including a vendor, supplier, or consultant) submit a record that does not accurately reflect the substance of the transaction is prohibited.

It is never acceptable to take any part, no matter how small your role, in any activity that involves theft, fraud, embezzlement, extortion, or misappropriation of property. We may never help conceal, alter, falsify, or omit information in our records either for our benefit or at the direction of any others.

**Q.**

I've been asked by a trusted colleague to approve an invoice for services that I'm not sure were performed. What should I do?

**A.**

Do not approve the invoice until you confirm that the services were performed. If you approve an invoice for services that were not performed, you are participating in fraud and false reporting. If a payment is made based on your approval, you are part of an event that may be considered theft. When in doubt, speak to your manager or Global Legal and Compliance.

**Q.**

During my commute to the office on the train, I sometimes make work-related calls. Is this a problem?

**A.**

You must be careful not to discuss non-public Company information in public places, such as in taxis, trains, elevators or at conferences and trade shows. When it is necessary to conduct a telephone call in a public place, be mindful of your surroundings.

Additionally, employees who are responsible for internal accounting controls or financial reporting systems must comply with the [Finance Code of Ethics](#), which requires vigilance in recording entries accurately, honestly, and in a manner that satisfies all applicable legal requirements.

### **Physical Assets and Intellectual Property**

We all share the responsibility for safeguarding Arrow's assets and making sure that they are used responsibly and appropriately. This includes protecting Arrow property against theft, loss, damage, abuse and unauthorized use. Similarly, personal devices and accounts (e.g., email, messaging, etc.) should not be used to conduct Company business. It is not permitted to use Arrow's information technology and systems for activities that are harmful, unlawful, unethical, or otherwise contrary to the Code.

Among the most valuable assets is Arrow's "intellectual property," including our trade secrets, brands, logos, trademarks, and copyrights; business and marketing plans; engineering and manufacturing ideas, designs, databases, records, salary information; and any unpublished financial data and reports. If a third-party requests use of Arrow's trademark or other intellectual property, ensure proper authorization prior to distributing.

### **Confidential Information**

Arrow generates and receives from customers and suppliers a great deal of confidential information. In general, confidential information includes non-public technical, legal and business information related to Arrow, its employees, customers and suppliers. This also includes information concerning contracts, products, services, proprietary systems and equipment, sales and marketing strategies, pricing, margins, business developments and plans, actual and potential customers and suppliers (including their identity, contacts, and selling and purchasing tendencies), actual and projected financial results, and Company earnings.

Arrow employees have the responsibility to safeguard that information and not disclose it, except as authorized by Arrow or only to those who need to know in connection with conducting Arrow business. Unauthorized recording, use or disclosure of confidential information, including communications, is prohibited.

All documents, records, files, or compilations containing, or derived from confidential information must be turned in when an employee leaves Arrow. Employees must maintain the confidentiality of information even after employment ends. Confidential information you were entrusted with at a previous employer should not be used for Arrow's benefit. Confidential information remains Arrow property no matter where or how it is created or stored.

Refer to Arrow's [Information Governance Policy](#) for more information on how to manage confidential information.

### **Safeguarding Personal Data**

Arrow is committed to upholding globally recognized data privacy principles, including the protection of personal data from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Personal data is defined as information, either alone or in combination, that identifies specific individuals, whether Arrow employees, their families or the employees of third parties.



Examples of personal data include name, email address, postal address, telephone number, bank information and credit or debit card account number.

All personal data shall be treated as confidential and in accordance with all applicable privacy laws. Arrow employees share the responsibility to safeguard personal data by:

- Only accessing, collecting, and using personal data for a legitimate business purpose;
- Disclosing personal data only to authorized persons who have a legitimate business purpose to receive the information
- Observing applicable restrictions regarding the transfer of personal data across national borders; and
- Deleting personal data when it is no longer required in accordance with Arrow's [Information Governance Policy](#) and [Global Retention Schedule](#).

## Cybersecurity

Cybersecurity attacks are becoming increasingly sophisticated. The impacts of cybersecurity incidents and threats are growing in severity and disruption. In many jurisdictions Arrow may be obligated to report cybersecurity incidents. Arrow employees must comply with Company information technology ("IT") and security policies, and timely report any suspected cybersecurity incidents.

Refer to Arrow's [Information Security Policy](#) for detailed information on securing our IT environment and how to report suspected incidents.

## Artificial Intelligence

Artificial Intelligence (AI) presents unprecedented opportunities for innovation. We are committed to harnessing this technology in a safe, ethical, and responsible manner that emphasizes robust AI governance. Employees involved in developing or using our AI capabilities are responsible for ensuring that this is done in an equitable and transparent manner, and that systems and outputs are monitored for accuracy and reliability.

Refer to Arrow's [Intelligence Automation Policy](#) for further detail on our expectations for the responsible use of these emerging technologies.

# Communicating Responsibly

## Social Media

Arrow has fully embraced the power of social media and its enormous role in the marketplace. Employees must use social media sites and tools responsibly and with good judgment and in compliance with Arrow policies.

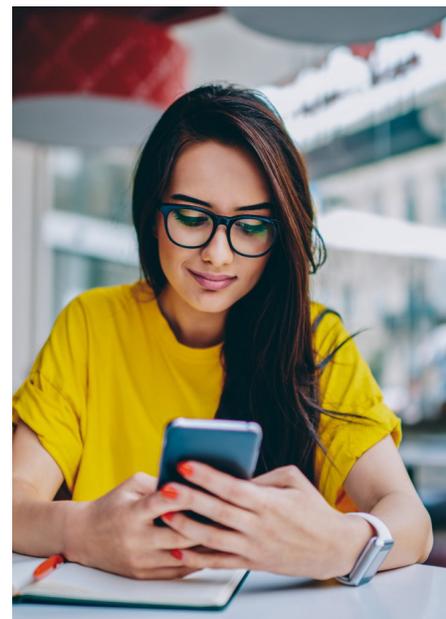
Refer to Arrow's [Global Social Media Policy](#) for guidelines related to posting on social media.

## Communications with the Public, Investors, and Government Officials

It is important for us to speak about the Company with one consistent voice. Employees are prohibited from making any statements on the Company's behalf, even if the request for information is informal. Instead, you should:

- Refer requests from a securities analyst to Investor Relations;
- Refer media requests to Corporate Communications; and
- Direct requests from any other individuals, including government officials, to Global Legal and Compliance.

Refer to Arrow's [Regulation FD Policy](#) and [Corporate Disclosure Policy](#) for further guidance.



**DO:** Be vigilant against cyber-attacks and scams such as phishing and report immediately any incidents.

# Questions, Problems, and Reporting Violations

Questions concerning this Code or any other Arrow policy may be directed to your management team or the contacts in [Global Legal and Compliance](#), listed below. Requests for Code or policy waivers and reports of any violation of the Code or of any law or applicable regulation should also be directed to any of the following:

## GLOBAL LEGAL AND COMPLIANCE

[compliance@arrow.com](mailto:compliance@arrow.com)

### Carine Jean-Claude

Senior Vice President and Chief Legal Officer

[cjeanclaude@arrow.com](mailto:cjeanclaude@arrow.com)

Telephone: +1 303 824 3780 (U.S.)

### Deborah Tighe

Vice President Legal Affairs and Chief Compliance Officer

[dtighe@arrow.com](mailto:dtighe@arrow.com)

Telephone: +1 303 824 3773 (U.S.)

### Rebecca Bower

Legal Counsel Director

[rebecca.bower@arrow.com](mailto:rebecca.bower@arrow.com)

Telephone: +1 303 824 3719 (U.S.)



## ARROW ASIA

### Brenda Chong

Vice President Legal Affairs

In Cantonese, Mandarin, or English

[brenda.chong@arrow.com](mailto:brenda.chong@arrow.com)

Telephone: +852 2253 3356 (Hong Kong)

### Cindy Wei

Director Legal Affairs and Compliance

In Cantonese, Mandarin, or English

[cindy.wei@arrow.com](mailto:cindy.wei@arrow.com)

Telephone: +852 2484 2895 (Hong Kong)

## ARROW EUROPE

### Horst Schwanke

Vice President Legal Affairs

In English, Dutch, or German

[horst.schwanke@arrow.com](mailto:horst.schwanke@arrow.com)

Telephone: +49 6102 5030 8947 (Germany)

### Sarwat Ayub

Director Legal Affairs and Compliance

In English or German

[sarwat.ayub@arrow.com](mailto:sarwat.ayub@arrow.com)

Telephone: +49 6102 5030 8628 (Germany)

## ARROW LATIN AMERICA

### Fernanda Ferreira Suarez

In English or Portuguese

Director Legal Affairs and Compliance

[fernanda.suarez@arrow.com](mailto:fernanda.suarez@arrow.com)

Telephone: +55 11 3613-9300 (Brazil)

Arrow seeks to help protect personal data. All personal data will be treated as confidential



# Confidential Reporting on Arrow's AlertLine

Arrow maintains a 24-hour a day, seven days a week "AlertLine," which provides a method for reporting to the Chief Compliance Officer and, where appropriate, Arrow's Board of Directors with complete anonymity (subject to restrictions which may be imposed by laws of your home country). Reports may be made in any language.

Go to <http://arrowalertline.arrow.com> to submit a concern online or to obtain dialing instructions if you prefer to call.



# Are You Five Years Out?

Most people live in the present. The world of now. But a handful of us work in a unique world that doesn't quite exist yet — the world of Five Years Out.

Five Years Out is the tangible future. And the people who live and work there know that new technologies, new materials, new ideas and new electronics will make life not only different, but better. Not just cheaper, but smarter. Not just easier, but more inspired.

Five Years Out is an exciting place to be. So exciting that, once you've been there, it's hard to get excited about the present. Because we know what's coming is going to be so much better. Five Years Out is a community of builders, designers, engineers, and imaginers who navigate the path between possibility and practicality. Creating the future of everything from cars to coffeemakers.

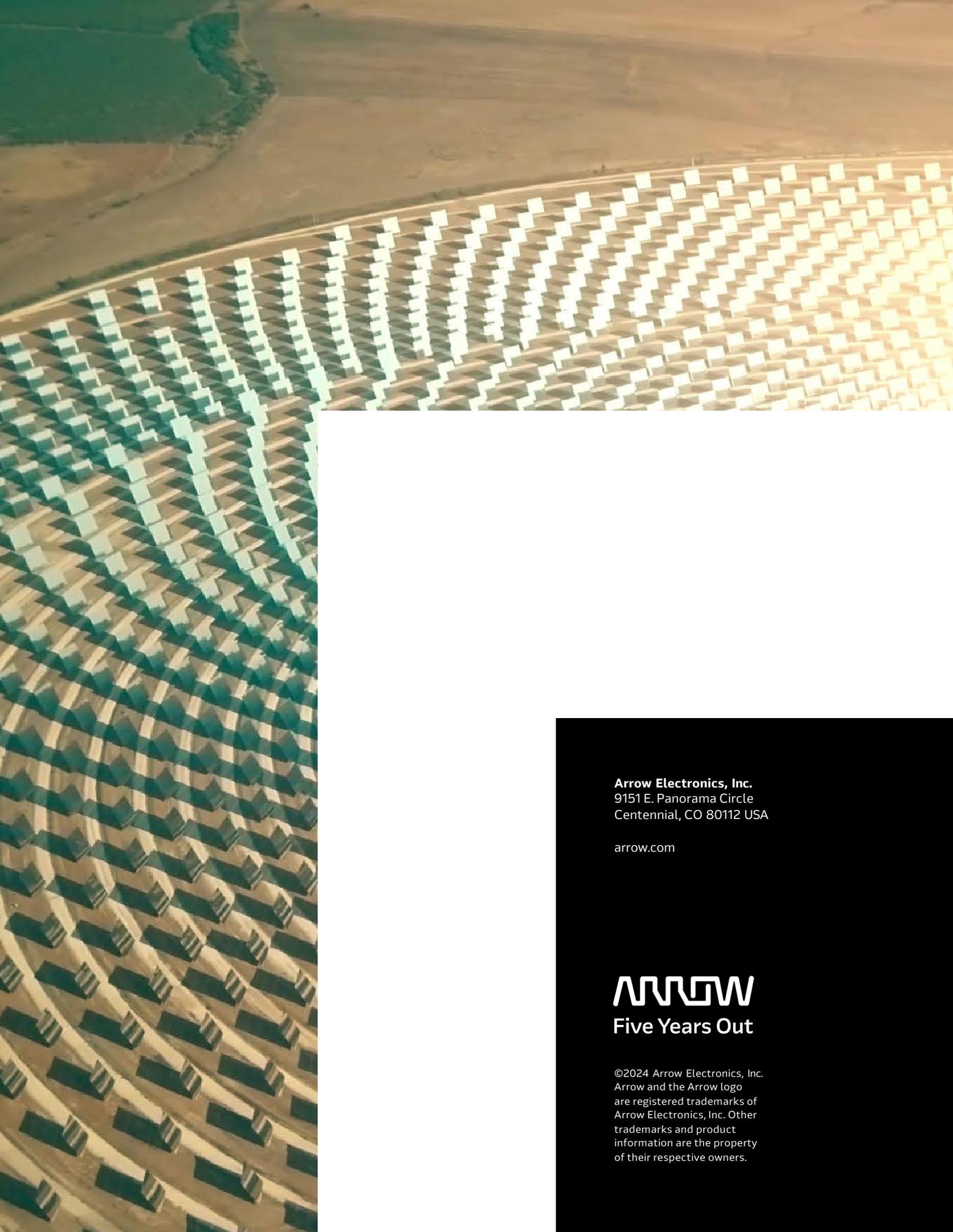
Are you one of them? Then you're probably working with us.

[arrow.com](http://arrow.com)

[FiveYearsOut.com](http://FiveYearsOut.com)

Visit our websites to learn more about the professional services available to you.





**Arrow Electronics, Inc.**  
9151 E. Panorama Circle  
Centennial, CO 80112 USA

[arrow.com](http://arrow.com)

**ARROW**  
**Five Years Out**

©2024 Arrow Electronics, Inc.  
Arrow and the Arrow logo  
are registered trademarks of  
Arrow Electronics, Inc. Other  
trademarks and product  
information are the property  
of their respective owners.