



Arrow Electronics, Inc.
UK Slavery and Human Trafficking Statement
For the Year Ended December 31, 2023

1. Introduction

This statement is made by Arrow Electronics, Inc. including its affiliates or wholly owned subsidiaries (collectively, "Arrow") (hereinafter, "Arrow") pursuant to Section 54(1) of the United Kingdom's Modern Slavery Act 2015 and includes the activities of our majority-owned subsidiaries.

Arrow is firmly committed to maintaining the highest ethical and legal standards. We continually strive to comply with both the letter and spirit of all applicable laws and regulations. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and includes the activities of all our majority owned subsidiaries. Arrow maintains effective business controls as well as a dynamic and robust compliance program designed to detect and prevent violations of applicable laws, including laws regarding slavery, human trafficking and forced or compulsory labour, throughout our operations. Local policies and practices are reviewed and audited against corporate guidelines. Consequently, Arrow's compliance program is not static but is ever evolving to meet changing business circumstances and regulations.

Employees are encouraged to contact Arrow's law department, including the Chief Legal Officer and the Chief Compliance Officer, or the finance department, including the Chief Financial Officer, with questions regarding any of our policies and practices. Employees also have the option of using Arrow's AlertLine which provides an external channel to allowing employees and third parties to report violations or concerns regarding business ethics or compliance via a confidential, independent third party (the "AlertLine").

2. Arrow's Structure

Arrow is a global provider of products, services, and solutions to industrial and commercial users of electronic components and enterprise computing solutions. Our Corporate Head Office is in Denver, Colorado, USA, however we have a global reach including multi sites within the UK and EMEA region. Arrow had sales in excess of \$ 33bn in 2023.

3. Our Business

Our business is broadly organized into four divisions: Arrow Enterprise Computing Solutions Ltd, Arrow Electronics UK Ltd, R.D Trading Ltd and Specialty Businesses including but not limited to; A. E. Petsche, Richardson RFPD, Inc., and NIC Components Europe Limited.

4. Our Supply Chains

Arrow serves as a supply channel partner for original manufacturers, contract manufacturers and commercial customers through a global network.

5. Our Policy on Slavery and Human Trafficking

At Arrow, we are committed to ensuring that there is no slavery, servitude, forced or compulsory labour or human trafficking in our supply chain or in any part of our businesses.

Arrow's senior managers promote and encourage transparency, ethical conduct and a commitment to comply with anti-slavery and human trafficking laws. Our employees are provided with resources and training to help them meet Arrow's ethical and legal obligations with regards to anti-slavery and human trafficking laws, including the Modern Slavery Act 2015. Arrow's Worldwide Code of Business Conduct and Ethics (the "Code") is a central component of our overall compliance program. Arrow's Code is administered by our Chief Compliance Officer and requires all employees to comply with the Code and obey the law. The Code contains policies aimed at combating slavery and human trafficking. The audit committee of Arrow's Board of Directors reviews the Code annually to ensure that it continues to meet or exceed the current regulatory framework and Arrow's operational strategies.

Proposed changes to the Code are reviewed and approved by the Board of Directors before being implemented and communicated to our employees. Additionally, the Board requires that all Arrow employees, officers, and directors review and certify their understanding and acceptance of the Code annually. Arrow's Code can be accessed on the company's web site at: <https://www.arrow.com/company/overview/corporate-governance/reporting-and-governance>.

Arrow's anti-bribery policies apply to all Arrow officers, directors, and employees worldwide and all of its subsidiaries and affiliated companies. Its general principles and prohibitions also apply to agents, distributors, consultants, and any other third parties acting on Arrow's behalf, regardless of country of residence or citizenship.

6. Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- 6.1** Where possible Arrow builds long standing relationships with manufacturers, suppliers and customers and make clear our expectations of business behaviour;
- 6.2** With regards to our supply chains, Arrow expects each entity to have suitable anti-slavery and human trafficking policies and processes, and we conduct third party due diligence in accordance with our procedures. We expect each entity to, at least, adopt 'one-up' due diligence on the next link in the chain. With the number of manufacturers and suppliers that we deal with on a regular basis, it would not be practical for Arrow (and every other participant in the chain) to have a direct relationship with all links in the supply chain, as this starts ultimately with the sourcing of the applicable raw materials;
- 6.3** Arrow has in place robust systems to encourage the reporting of concerns and the protection of 'whistle-blowers'. The Arrow [AlertLine](#) is a confidential means of reporting any concerns for all employees, in accordance with applicable local rules and regulations; and
- 6.4** Failure to comply with anti-slavery laws will not be tolerated. Any Arrow employee who engages in conduct that results in a violation of these laws is subject to discipline, up to and including termination of employment. Similarly, consultants, agents or third-party service providers that provide services to or on



behalf of Arrow should expect to have their contracts terminated if they violate anti-slavery laws.

7. Business Partner Adherence to Our Values

Arrow believes in the importance of its business partners to adhere to our high ethical and legal standards, and therefore requires all of its business partners to review and comply with our Business Partner Code of Conduct (“BPCOC”). This BPCOC is based on the same principles as the employee Arrow’s Worldwide Code of Business Conduct and Ethics. Arrow also offers training to its partners to make certain of their understanding of all applicable laws, rules and regulations while conducting Arrow business. The BPCOC can be accessed on Arrow’s website at: <https://www.arrow.com/company/overview/corporate-governance/reporting-and-governance>.

All managers are responsible for compliance in their respective departments and supplier relationships.

8. Training

Our compliance training program includes both online and instructor led training courses which are delivered in the local languages of our employees. Training covers many relevant topics including legal requirements, the Code, and modern slavery. We have expanded the training materials to specifically address the definition of modern slavery and worked to increase employee awareness on this issue by expanding the target audience to receive the training. Additionally, we periodically provide key employees with informational notices on high-risk issues, where a greater potential for bribery, corruption, or practices in violation of the Code may exist.

Arrow maintains a strong whistle-blower program and provides protection for any employee who reports misconduct through confidential reporting and a clear no-retaliation policy. As part of our Open-Door Policy employees are encouraged to come forward with questions or information regarding observed improprieties, including any related to slavery and human trafficking. Arrow maintains the [AlertLine](#) twenty-four hours a day/seven days a week, which provides employees with a mechanism for reporting to the Chief Compliance Officer, the Chief Legal Officer and, where appropriate, Arrow’s Board of Directors. Employees using the AlertLine have the option, where permitted by local law, to remain anonymous. Calls to Arrow’s AlertLine are responded to without delay. Details of the program are communicated to our Board of Directors as well as to our external auditors and the program is tested frequently throughout the year. Information on the AlertLine is included in the Code and is available on the company’s intranet sites across the regions as well as our public web site at: <https://www.arrow.com/company/overview/corporate-governance/reporting-and-governance>.

9. Our Effectiveness in Combatting Slavery and Human Trafficking

Arrow uses the following key performance indicators (KPIs) to measure how effective we have been in working to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain:

- 9.1 Use of payroll systems and human resources information system to ensure that all employees are registered and paid fairly for the work they do;



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- 9.2 The building of relationships/partnerships with the next link in the supply chain and their understanding of, and compliance with, applicable laws and Arrow expectations;
 - 9.3 Measuring completed/outstanding trainings, and the corresponding increase in employee awareness of risk; and
 - 9.4 Monitoring Arrow [AlertLine](#) use and issue resolution.

10. Additional Information

For additional information about Arrow and our efforts to combat slavery, human trafficking and forced or compulsory labor, we are providing the following links to our public web site:

- 10.1 Arrow Electronics, Inc. Investor Relations page including annual reports and proxy statements: <https://investor.arrow.com/investors/>.
- 10.2 Arrow's fact sheet: For additional information on Arrow's history and business. <https://www.arrow.com/company>.
- 10.3 Our Corporate Governance page including a link to our Code of Conduct: <https://www.arrow.com/company/overview/corporate-governance/reporting-and-governance>.

Thank you for your continued confidence in Arrow.

Sincerely,

Deborah Tighe
Vice President, Legal Affairs and Chief Compliance Officer