

DigiKey Code of Ethics

1. Purpose

This document defines the DigiKey Code of Ethics, which prescribes standards of ethical business conduct for DigiKey Corporation's (DigiKey) employees and individuals acting on DigiKey's behalf.

2. Scope

The DigiKey Code of Ethics outlines DigiKey expectations regarding ethical and business standards. All employees, business partners, representatives, and agents of DigiKey must adhere to this code.

All DigiKey employees, business partners, representatives, and agents should avoid any conduct that violates this Code or DigiKey's policies. These standards, as outlined below, are not necessarily the only obligations that would apply to the conduct of those individuals.

This code also applies to any consultants or subcontractors of DigiKey, or its business partners who may be providing services or goods to DigiKey and/or to business partners. DigiKey's business partners are fully responsible for ensuring full compliance.

3. Policies

3.1 General Ethical standards

DigiKey is committed to the highest standards of ethical business conduct, including all applicable laws, rules, and regulations. These standards apply to anyone who works on DigiKey's behalf, and who agrees to not engage in conduct or activities that may raise questions about DigiKey's honesty, impartiality, or reputation. All employees, business partners, representatives, and agents of DigiKey will conduct business with integrity and comply with all applicable laws in a manner that excludes consideration of personal advantage or gain.

DigiKey establishes high standards of quality, engages in continuous improvement, and makes factbased decisions to meet customer requirements and increase customer satisfaction. DigiKey is committed to being its customers' preferred distributor.

1. Compliance with Laws, Regulations, and Rules

DigiKey, its employees, agents, business partners, and representatives will comply with the laws of the respective countries where DigiKey does business, as well as with other applicable laws, rules, and regulations. This includes all U.S. export control laws and regulations.

2. Environment, Health, and Safety

All DigiKey employees, contingent workers, agents, business partners, and representatives will comply with all federal, state, and local laws and regulations that apply to its operations. Compliance also includes those laws and regulations concerning health, safety, and the environment.

3. Antiboycott

All DigiKey employees, agents, business partners, and representatives will comply with DigiKey's Antiboycott Policy. Any questions regarding the Antiboycott Policy should be

directed to DigiKey's Trade Compliance management.

4. Business Integrity

Corruption, extortion, and/or embezzlement are strictly prohibited. DigiKey employees, agents, business partners, and representatives must not pay or accept bribes, or participate in other illegal inducements in business or government relationships, and should comply with all applicable anti-corruption laws, such as the Foreign Corrupt Practices Act (FCPA). Any questions regarding the FCPA policy should be directed to DigiKey's Trade Compliance management

5. Antitrust/Competition Laws

Employees and business partners must not exchange or discuss with a competitor prices, terms/conditions of a sale/service, or other competitive information, or engage in any other conduct that violates any of these laws. All DigiKey employees, business partners, agents, and representatives must comply with antitrust/competition laws and should not enter into any understanding, agreement or plan -- expressed or implied, formal or informal, written or oral -with a competitor regarding prices, terms/conditions of sale or service, production, distribution territories, or customers. Any antitrust/anti-competitive issues should be referred to DigiKey legal counsel promptly.

6. Proprietary Data

DigiKey employees, agents, representatives, and business partners must take responsible precautions to protect DigiKey's and its customers' confidential and proprietary data. Nondisclosure agreements will be signed, and communication of any copyrighted materials, trade secrets, proprietary information, or any other highly sensitive confidential information to inappropriate parties will not occur.

7. Equal Employment Opportunity, Anti-harassment, and Sexual Harassment

DigiKey prohibits discrimination against any person because of race, creed, color, religion, disability, sex, sexual orientation, gender identity, marital status, familial status, national origin, age, status as a protected veteran, genetic information, pregnancy, status regarding public assistance, membership or activity in a local commission, or any other statutorily protected category. This policy applies to all employment practices and personnel actions.

8. Forced Labor and Human Trafficking

DigiKey is committed to upholding the fundamental principles of international human and workplace rights everywhere it does business.

9. Conflict of Interest

Any employee or agent of DigiKey or a business partner who has a personal, business, or financial interest that is incompatible with the loyalty and responsibility owed to DigiKey must be reported to DigiKey legal counsel.

10. Political Payments

DigiKey employees must not use any company funds or assets to assist any candidate or nominee to gain political office, or to assist any political parties or committees, unless permitted by law.

11. Use of Personal Data

The personal data of DigiKey employees will be treated in accordance with applicable data protection laws, [DigiKey's privacy policy](#), and any other applicable laws, rules, and regulations.

12. Accounting Systems, Books, and Records/Private Disclosure

All DigiKey employees, agents, representatives, and business partners will comply with accounting, bookkeeping, disclosure, and reporting requirements of the respective countries and follow all applicable laws, rules, and regulations.

13. Community Involvement

DigiKey is involved in many of the communities where it does business, helping charitable and civic organizations primarily through DigiKey Cares, which is DigiKey community outreach program.

3.2 Reporting Noncompliance

Employees who wish to report any conditions or actions that are not in compliance of this policy should contact Employee Relations or legal counsel.

No person will be retaliated against, in any manner, for in good faith reporting a suspected incident of ethical misconduct, for participating in an ethics investigation, or for assisting DigiKey in its efforts to prevent such incidents from occurring. Any employee who violates the anti-retaliation provision of this policy is subject to disciplinary action, up to and including termination of employment.

3.3 Consequences of Noncompliance

When DigiKey becomes aware of any conditions or actions that are not in compliance with this code, DigiKey reserves the right to demand corrective measures. DigiKey reserves the right to terminate an agreement with any party who does not comply with this code. DigiKey reserves the right to provide disciplinary action, up to and including termination of employment, to any DigiKey employee who does not comply with this code.