

# Global Human Rights Policy

TD SYNEX is committed to conducting all business activities in accordance with all applicable laws, regulations and internationally recognized human rights principles.<sup>1</sup> This TD SYNEX Global Human Rights Policy (“Policy”) provides guidance and establishes clear expectations for all TD SYNEX business partners.

## Due Diligence

We expect our business partners to have a robust due diligence process in place to assess their own and their business partners’ performance for human rights and responsible sourcing. This includes:

- Conducting due diligence assessments of how their activities might adversely affect human rights, to minimize adverse impacts, and to remediate harms.
- Establishing and following a process to identify and mitigate risks in their supply chains.
- Conducting social compliance audits on their suppliers that assess supplier performance against Social Compliance topics including, but not limited to: Compliance with laws and regulations, Wages and Benefits, Child Labor, Modern Slavery, Forced Labor and Human Trafficking, Working Hours, Discrimination and Harassment, Environmental, Health and Safety and Freedom of Association.
- Ensuring that suppliers are assessed on an annual basis.

Upon completing this due diligence, it is expected that business partners will take action to improve their own business practices or work directly with their suppliers to develop action plans outlining the steps the supplier will take towards meeting expectations.

## Compliance with Laws and Regulations

Partners are required to comply with all applicable laws in any country in which they conduct business and demonstrate actions in all situations that meet or exceed those required by applicable law.

## Fundamental Principles and Rights at Work

The following principles apply directly to all TD SYNEX business partners, who are also expected to ensure the same principles are followed by their suppliers.

## Wages and Benefits

Business partners and their suppliers must ensure that wages paid to employees comply with all applicable wage laws, including minimum wages, overtime hours and legally mandated benefits. Holidays and paid annual leave shall be paid according to applicable laws. Benefits provided to employees must meet the applicable minimum legal standards.

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All employees shall be provided with clear and understandable written information about their wage for each pay period and their employment conditions in a language understood by the employee.

Wage deductions must not be excessive and shall be itemized. Deductions from wages as a disciplinary measure should not be permitted. No deductions from wages are permitted without the express, written permission of the employees concerned.

### Working Hours

Business partners must ensure that they and their suppliers comply with applicable laws and industry standards around working hours. All workers shall be entitled to at least one day off during each seven-day period. If overtime work is needed, it should be voluntary and workers shall be compensated at a rate which is higher than regular wages and in accordance with applicable laws. Furthermore, a standard workweek should not be more than 60 hours a week, including overtime, except if there is an emergency or extraordinary circumstances.

### Forced Labor

Business partners must ensure that they and their suppliers never use any forced, bonded or indentured labor, or involuntary prison labor, or participate in any forms of trafficking of persons or slavery. All our business partners and their suppliers must respect and follow international human rights instruments, which prohibit all forms of modern slavery and human trafficking. This includes transporting, harboring, recruiting, transferring or receiving persons by means of coercion, force, or threat. There shall never be any restrictions on freedom of movement.

### Child Labor

Business partners and their suppliers must ensure compliance with all applicable laws and only employ individuals who are at, or above, the legal minimum working age, the age designated by applicable law for completion of compulsory education, or 15 years of age, whichever is greater.

For any work that requires greater maturity, is hazardous in nature, or includes night work that could conflict with educational needs, the employee shall be at least 18 years of age. Partners and their suppliers are required to maintain official documentation of each employee's date of birth, and this should be verified during the hiring process and confirmed through social compliance audits.

### Discrimination and Harassment

Business partners must ensure that they and their suppliers never discriminate against their employees or prospective employees in any circumstance. This is inclusive of hiring practices, termination of employees or other terms or conditions of work that reflect discrimination, injustice, and systemic racism, including any form of discrimination or harassment on the basis

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of race, color, national origin, gender, gender identity, religion, age, disability, political affiliation, sexual orientation, social or marital status, maternity, or membership in worker's organizations. TD SYNEX prohibits harassment, discrimination, violence, and retaliation of any kind, and we expect our Business Partners to have zero tolerance for violations motivated by any form of prejudice or bigotry.

### Disciplinary Practices

Business partners must ensure that they and their suppliers do not engage in any physical discipline or abuse, the use or threat of corporal punishment, or the use or threat of any type of abuse or harassment against its employees, including but not limited to mental, physical, sexual or verbal harassment. The use or threat of any other forms of intimidation are also prohibited. All major disciplinary measures taken against employees shall be documented.

### Environmental

Business partners must ensure that they and their suppliers are in compliance with all local environmental laws and regulations applicable to the workplace. Business partners and their suppliers must also conduct business in a manner which considers their environmental impact.

### Health and Safety

Business partners must ensure that they and their suppliers always provide a safe, respectful, and healthy working environment in accordance with applicable laws and regulations. Employees should regularly be trained on health and safety to ensure compliance and employees should be provided with the necessary Personal Protective Equipment (PPE) to conduct their job in a safe manner.

### Freedom of Association

Business Partners should always respect the rights of their employees to join any lawful organization, including union membership.

### Education

TD SYNEX recognizes the importance of education and the sharing of best practices in human rights and social compliance. TD SYNEX is committed to working collaboratively with our partners to provide training on key issue topics and facilitate the sharing of industry best practices around human rights and responsible sourcing practices.

### Reporting

Progress is reported on an annual basis through the TD SYNEX Corporate Citizenship Report which will be informed through the following:

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- Business partners working with their suppliers to ensure suppliers have effective management systems in place to ensure compliance.
- Business partners and their suppliers maintaining onsite documentation to verify compliance.
- Business partners developing action plans to ensure meeting the expectations outlined herein. The developed action plan needs to include education and training.
- Business partners taking swift action to remediate any issues if non-conformities are identified

At TD SYNEX request, business partners shall provide documentation that demonstrates compliance to this TD SYNEX Human Rights Policy.

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<sup>i</sup> We respect all human rights - civil, political, economic, social, and cultural. TD SYNEX is committed to respecting the human rights under the following international human rights instruments:

[UN Guiding Principles on Business & Human Rights](#)

[The Global Network Initiative Principles](#)

[Universal Declaration of Human Rights](#)

[International Covenant on Civil and Political Rights](#)

[International Covenant on Economic, Social and Cultural Rights](#)

[International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#)

[Convention on the Elimination of All Forms of Discrimination against Women](#)

[Convention on the Rights of the Child](#)

[Convention on the Rights of Persons with Disabilities](#)

[International Convention on the Elimination of All Forms of Racial Discrimination](#)

[International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families](#)

[Geneva Conventions and their Additional Protocols](#)

[Rome Statute of the International Criminal Court](#)

[United Nations Declaration on the Rights of Indigenous Peoples](#)

[United Nations Declaration on Human Rights Defenders](#)

TD SYNEX supports the following frameworks and multi-stakeholder initiatives:

[Child Rights and Business Principles](#)

[Global Network Initiative](#)

[Sustainable Development Goals](#)

[United Nations Global Compact](#)

[United Nations Standards of Conduct for Business on Tackling Discrimination against LGBTI people](#)

[Women's Empowerment Principles](#)