

# The TD SYNEX Speak Up and Non-Retaliation Policy

TD SYNEX expects our co-workers and business partners to speak up when they have concerns about illegal behavior or misconduct in our community. We comply with whistleblower laws everywhere we do business, and we strive to maintain a speak up culture where everyone is empowered to be ethical leaders.

To ensure everyone in our broader community is prepared to initiate a report when needed, we publish our internal Speak Up and Non-Retaliation Policy externally for everyone to see.

Date of Last Update: 02/01/2024

## **NOTE TO EXTERNAL STAKEHOLDERS:**

If you are not a TD SYNEX co-worker, some of the links and reporting channels in the following policy will not apply for you. Instead, you can exercise your reporting rights and responsibilities as defined in the policy through our [Ethics Line](#) or by emailing our Ethics and Compliance team at [ethicsandcompliance@tdsynnex.com](mailto:ethicsandcompliance@tdsynnex.com).

## Policy Statement

*TD SYNEX expects our co-workers and business partners to speak up when they have concerns about illegal behavior or misconduct in our workplace. We comply with whistleblower laws everywhere we do business, and we strive to maintain a speak up culture where everyone is empowered to be ethical leaders. We have multiple reporting channels to make speaking up easy. We protect the identity of the reporter when speaking up. We investigate reports independently and objectively. We will act when needed to stop misconduct and prevent future incidents. We will not tolerate any form of retaliation against those who speak up to report potential misconduct.*

## Scope

This Policy applies to all TD SYNEX current and former co-workers, candidates, board members, and any third-party doing business with or acting on behalf of TD SYNEX.

## What does this policy mean to you?

If you see or suspect illegal or unethical behavior at TD SYNEX, it is your responsibility to speak up. We'll listen, and we'll take action to help. You can talk to your manager, your leadership team, HR, Legal, a local Ethics Advisor, or our Ethics and Compliance (E&C) team. Alternatively, you can submit a concern to our Board's Audit Committee or through the Ethics Line website or hotline. Your identity will be protected when you speak up. You can also choose to remain anonymous if desired, when reporting via the Ethics Line.

This policy will help you identify the best reporting channels for your situation. The policy also includes:

- Practical tips for using the Ethics Line.
- Requirements for managers when acting as a reporting channel.
- A summary of steps TD SYNEX will take in response to any report.
- A description of your full protection from retaliation. If you suspect retaliation, in any form, report immediately using the tips provided in this policy.

## Helpful Contacts

If you have any questions or concerns regarding this policy, please contact the TD SYNEX Ethics and Compliance team (E&C) at [ethicsandcompliance@tdsynnex.com](mailto:ethicsandcompliance@tdsynnex.com).

## How do I choose a reporting option?

At TD SYNEX, we know that speaking up early can stop a bad situation before things get worse. We offer a wide range of reporting options to make that easy.

All reports are ultimately received by the E&C team and the HR team who operate the reporting system within TD SYNEX. You can report a concern directly to the E&C team by contacting a team member directly or by sending an email to [ethicsandcompliance@tdsynnex.com](mailto:ethicsandcompliance@tdsynnex.com), or contacting your HR team directly. Or you may choose to submit a report to the E&C team and HR team through the following reporting channels:

- the [Ethics Line](#)
- a manager at TD SYNEX and local business leadership
- a local [Ethics Advisor](#)
- the [Legal](#) team

Managers and local leadership—along with local HR—are the best point of contact for concerns about general work practices or personality disputes. Their insights into the local business can help find effective solutions and clarify misunderstandings before they become a serious issue.

If you have concerns about potentially unlawful behavior or a possible violation of our Code of Conduct, you can report your concerns directly to the E&C team or HR. Or, if you prefer, you can go to any of the other reporting options above, who can listen and escalate your concerns to the right TD SYNEX team.

You are free to choose whichever reporting option feels most comfortable to you, including the possibility to request a meeting in person within a reasonable timeframe. Or you can use the [Ethics Line](#), which you can use to report online or by phone. The Ethics Line is a great resource if you aren't sure where else to turn, or if you wish to remain anonymous. No matter how you choose to report, your identity will be kept confidential in accordance with applicable laws.

If you have any doubt about the status of your report, or if the potential misconduct remains unaddressed, follow-up or report again using any of the reporting options listed above.

## Complaints to the Audit Committee or External Counsel

Complaints about questionable accounting or auditing matters, corporate fraud, or violations of applicable law can be sent through our Audit Committee or External Counsel using the contact details below. These cases will be shared with our General Counsel and will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate review.

<p>Chair of the Audit Committee 44201 Nobel Drive Fremont, California 94538 (510) 668-3434 (Telephone) (510) 668-3707 (Facsimile)</p>	<p><b>Allison M. Leopold Tilley</b> Pillsbury Winthrop Shaw Pittman LLP 2550 Hanover Street Palo Alto, California 94304-1115 (650) 233-4518 (Telephone) (650) 233-4545 (Facsimile) allison@pillsburylaw.com (E-Mail)</p>
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## External Reporting Options

We do encourage you to report your concerns to us through any of our reporting channels. At TD SYNEX, we are committed to review and manage all reports in a confidential and professional manner and determine the appropriate action. However, information about external reporting options is available [here](#).

## How should managers respond?

Most of our co-workers say they would go to their manager first if they had concerns about misconduct at TD SYNEX. If you are a manager, you must be prepared for that conversation.

### **Listen carefully and thank the individual for bringing their concerns to you.**

Tell them that speaking up was the right thing to do. Reiterate their protection from retaliation and explain what will happen next, as defined in this policy.

### **Escalate to HR or Ethics and Compliance for further support.**

This is required if the report involves possible violations of our Code of Conduct or illegal behavior.

### **Follow up.**

Keep the reporter informed of progress and ensure they are not experiencing retaliation.

### **Protect confidentiality.**

Do not talk to anyone about the report, the identity of the reporter or others involved in the report, except for the relevant personnel within Ethics and Compliance and HR who review the report. Use available encryption tools when you escalate the report via email. We recommend using our secure [Matter Report Form](#) to share reports directly with the Ethics and Compliance team.

## How do I use the Ethics Line?

The Ethics Line is available 24 hours a day, 7 days a week. You can report your concerns online or find a local hotline number on the site to report by phone. Reports are stored on a secure server, only accessible to specialists who have received training on evaluating sensitive information.

You can choose to report anonymously if desired. However, please remember that we'll have no way of identifying you, and we may require additional information during the investigation. If you report anonymously, note your **Report Key** and **Password**, and check back through the Ethics Line often to communicate with us.

## What happens next?

We take all reports seriously. We will conduct research, hold interviews, and review relevant documents and data. If we need additional information, we'll reach out and ask. Co-workers must participate in the investigation openly and honestly, as required in our Code of Conduct.

All reports are reviewed by the E&C team for the reporter's region. They will assign the report to the relevant investigative resources to see who are best placed to independently investigate the matter. All investigations are conducted by trained internal investigators who will examine all compliance issues raised. We follow our **internal**

**investigation standards** to ensure our investigations are managed in an independent, objective and confidential manner.

The identity of the reporter will be protected and kept confidential. However, in exceptional circumstances it may be necessary to disclose information about the identity of the reporter to stakeholders outside the relevant E&C and HR functions. This may be the case if it would otherwise be impossible to protect the reporter, for example, in cases where the reporter is the victim of behavior threatening their mental or physical health. It may also be necessary to disclose information to conduct an investigation or to take appropriate corrective or disciplinary actions. In such cases, disclosure will be done on a strict need to know basis and only with prior explicit consent from the reporter, except when the disclosure of the identity to public authorities is required by law.

If evidence of misconduct is found, the relevant management and HR stakeholders will determine the appropriate disciplinary actions and corrective measures, with support from E&C. We follow TD SYNEX Disciplinary Guidelines to make sure disciplinary actions are fair for all co-workers. Our goal is to stop the misconduct and prevent similar incidents in the future. We strive to be fair and transparent to all parties throughout the process.

All reports received by HR and E&C, directly or indirectly through another reporting option, will be tracked and saved. The E&C team maintains an anonymized log of all complaints to share with the Audit Committee, including investigation notes and the resolution for each case. We maintain copies of this information in accordance with TD SYNEX's document retention policies and procedures. Any reporting will be done solely based on anonymized data that does not include the identity of the reporter.

## Non-Retaliation Statement

At TD SYNEX, we have zero tolerance for retaliation. We need to hear from you when you have concerns, and we will protect you from retaliation when you speak up for what you believe is right. You don't need to know all the details before you can speak up. Your only obligation is to be honest and to participate in the investigation as needed. This is known as a **good-faith report**. If your concerns aren't substantiated, that's okay. We still appreciate your genuine desire to help, and we'll still protect you from retaliation.

### What does retaliation look like?

Retaliation happens when someone directly or indirectly causes a co-worker undue hardship because they suspect the co-worker has made a report about them, assisted in an investigation, or wronged them in any way. It can also include retribution for requesting medical leave or a leave of absence, or for raising concerns about the leadership team or our business operations. Retaliation can appear as coercion, bullying, intimidation, harassment, or discrimination. It can also include attempts to interfere with a co-worker's role, including termination, demotion, reduced hours, or assigning undesirable tasks. Excluding the co-worker from essential business tasks or meetings can also appear as retaliation.

### What happens if I don't comply with this policy?

**TD SYNEX will not tolerate retaliation in any form.** Any act of retaliation is grounds for discipline, up to and including termination. Other violations of this policy can also result in disciplinary action, up to and including termination.