



Digi-Key Code of Ethics

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1.0 Purpose

This document defines the Digi-Key Code of Ethics, which prescribes standards of ethical business conduct for Digi-Key employees and individuals acting on Digi-Key's behalf.

2.0 Scope

The Digi-Key Code of Ethics outlines Digi-Key Electronics' expectations regarding ethical and business standards. All employees, business partners, representatives, and agents of Digi-Key Electronics must adhere to this code.

All Digi-Key employees, business partners, representatives, and agents should avoid any conduct that could appear to be inappropriate and improper, and which might damage Digi-Key Electronics' reputation. 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 Digi-Key Electronics, or its business partners who may be providing services or goods to Digi-Key Electronics and/or to business partners. Digi-Key Electronics' business partners are fully responsible for ensuring full compliance.

3.0 Policies

3.1 General Ethical Standards

Digi-Key Electronics 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 Digi-Key's behalf, and who agrees to not engage in conduct or activities that may raise questions about Digi-Key Electronics' honesty, impartiality, or reputation. All employees, business partners, representatives, and agents of Digi-Key Electronics will conduct business with integrity and comply with all applicable laws in a manner that excludes consideration of personal advantage or gain.

Digi-Key Electronics establishes high standards of quality, engages in continuous improvement, and makes fact-based decisions to meet customer requirements and increase customer satisfaction. Digi-Key Electronics is committed to being its customers' preferred distributor.

1. Compliance with Laws, Regulations, and Rules

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

2. Environment, Health, and Safety

All Digi-Key Electronics employees, 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 Digi-Key Electronics employees, agents, business partners, and representatives will comply with Digi-Key's Antiboycott Policy. Any questions regarding the Antiboycott Policy should be directed to Digi-Key Electronics' Trade Compliance management.

4. Business Integrity

Corruption, extortion, and/or embezzlement are strictly prohibited. Digi-Key Electronics 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



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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 Digi-Key Electronics' 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 Digi-Key Electronics 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 Digi-Key Electronics management promptly.

6. Proprietary Data

Digi-Key employees, agents, representatives, and business partners must take responsible precautions to protect Digi-Key Electronics' confidential 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

Every Digi-Key Electronics employee will provide a positive atmosphere and will not discriminate against any person because of race, creed, color, religion, disability, sex, sexual orientation, marital status, national origin, ancestry, age, military or veteran status, genetic information or characteristics (of the individual or a family member), pregnancy, status regarding public assistance, or any other statutorily protected category. This policy applies to all employment practices and personnel actions.

8. Forced Labor and Human Trafficking

Digi-Key Electronics 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 Digi-Key Electronics or a Digi-Key Electronics business partner who has a personal, business, or financial interest that is incompatible with the loyalty and responsibility owed to Digi-Key Electronics must be reported to Digi-Key Electronics management.

10. Political Payments

Digi-Key Electronics 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 Digi-Key Electronics employees will be treated in accordance with applicable data protection laws and any other applicable laws, rules, and regulations.

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

All Digi-Key Electronics 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.



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13. Community Involvement

Digi-Key Electronics is extensively involved with the communities where it does business, helping many local individuals and organizations in need. Digi-Key Cares is the Digi-Key Electronics community outreach program that serves the Thief River Falls community and surrounding area.

3.2 Consequences of Noncompliance

If Digi-Key Electronics should become aware of any conditions or actions not in compliance with this code, Digi-Key Electronics reserves the right to demand corrective measures. Digi-Key Electronics reserves the right to terminate an agreement with any party who does not comply with this code. Digi-Key reserves the right to provide disciplinary action to any Digi-Key Electronics employee who does not comply with this code, as noted in the Ethics Policy within Digi-Key Electronics' Employee Handbook.

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