



Digi-Key Code of Ethics

Doc Number: GDE.HR.001

Version: 1

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1.0 Purpose

Digi-Key Corporation is committed to the highest standards of ethical business conduct, including all applicable laws, rules and regulations. These commitments apply to everyone at Digi-Key Corporation who acts on the company's behalf, and who agrees to not engage in conduct or activity that may raise questions as to Digi-Key Corporation's honesty, impartiality or reputation. All employees, business partners, representatives and agents of Digi-Key Corporation will conduct business with integrity and comply with all applicable laws in a manner that excludes consideration of personal advantage or gain. Digi-Key Corporation establishes high standards of quality, engages in continuous improvement, and makes fact-based decisions to meet customer requirements and increase customer satisfaction. Digi-Key Corporation is committed to being the customers' preferred distributor.

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

General Ethical Standards

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 Corporation's reputation. These standards, as outlined below, are not necessarily the only obligations that would apply to the conduct of those individuals.

1) Compliance with the Laws, Regulations and Rules

Digi-Key Corporation, 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) Health, Safety and Environment

All Digi-Key Corporation 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) Anti-boycotts

All Digi-Key Corporation employees, agents, business partners and representatives will comply with the company's Anti-boycott Policy. Any questions regarding the Anti-boycott Policy should be referred to Digi-Key Corporation's Vice President of Corporate Initiatives.

4) Business Integrity

Corruption, extortion, and /or embezzlement are strictly prohibited. Digi-Key Corporation 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 referred to Digi-Key Corporation's Vice President of Corporate Initiatives.



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5) Anti-Trust/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 Corporation 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 or conditions of sale or service, production, distribution territories, or customers. Any antitrust/anti-competition problems should be referred to Digi-Key Corporation management promptly.

6) Proprietary Data

Digi-Key employees, agents, representatives, and business partners must take responsible precautions to protect Digi-Key Corporation's confidential proprietary data. Non-disclosure 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 Corporation 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 with regard to 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 Corporation 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 Corporation or a Digi-Key Corporation business partner who has a personal, business or financial interest that is incompatible with the loyalty and responsibility owed to Digi-Key Corporation must be reported to Digi-Key Corporation management.

10) Political Payments

Digi-Key Corporation 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 Corporation 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



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All Digi-Key Corporation 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

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

Application to Sub-Contractors/Consultants

This code also applies to any consultants or sub-contractors of Digi-Key Corporation, or its business partners who may be providing service or goods to Digi-Key Corporation and/or to business partners. Digi-Key Corporation business partners are fully responsible for ensuring full compliance.

Consequences of Non-Compliance

If Digi-Key Corporation should become aware of any conditions or actions not in compliance with this Code, Digi-Key Corporation reserves the right to demand corrective measures. Digi-Key Corporation 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 Corporation employee who does not comply with this Code, as noted in the Ethics Policy within the Digi-Key Corporation 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 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.

To report suspected ethical violations or for related inquiries, please contact our Ethics Hotline phone number at **888-542-9008** or email DK_Ethics@digikey.com.

Record Description	Responsibility/Location	Min. Retention Time
DK Code of Ethics	Human Resources/Andrea Pagh	3 years