



**AVX CORPORATION STATEMENT PURSUANT TO
THE MODERN SLAVERY ACT OF 2015
FY 2020**

In 2015, the United Kingdom enacted the Modern Slavery Act. This law contains a variety of provisions to combat slavery in the modern era, including a requirement that companies within its scope issue a statement concerning their supply chain and efforts to ensure that slavery and human trafficking is not taking place (i) in any of its supply chains, or (ii) in any part of its own business.

This statement is made pursuant to § 54 of the UK Modern Slavery Act 2015 and sets out the steps that AVX Corporation and AVX Limited (together with their consolidated subsidiaries, “AVX” or the “Company”) has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain and provides an update on our activities and commitments to prevent modern slavery in our operations and supply chains.

Overview

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. AVX has a zero tolerance approach to any form of modern slavery. AVX is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

In general, AVX is committed to the principles of SA 8000, the Responsible Business Alliance Code of Conduct, and the UK Modern Slavery Act 2015. AVX complies with the highest standard of business conduct and enforces those standards in its supply chain.

AVX’s understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labor Organization (“ILO”) particularly relating to forced or compulsory labor. AVX recognizes that forced labor as a form of slavery includes debt bondage and the restriction of a person’s freedom of movement whether that be physical, non-physical or, for example, by the withholding of a worker’s identity papers.

AVX Business

AVX is a leading worldwide manufacturer, supplier, and reseller of a broad line of electronic components; interconnect, sensing and control devices; and related products. Electronic components and connector, sensing and control products manufactured or resold by AVX are used in virtually all types of electronic products, including those in telecommunications, automotive, transportation, energy harvesting, consumer electronics, military/aerospace, medical, computer, and industrial markets.

AVX’s electronic component products include ceramic and tantalum capacitors, film capacitors, varistors, filters, passive and active antennas, and other components manufactured in our facilities

throughout the world and components manufactured by other suppliers to AVX. AVX also manufacture and sell electronic connectors and inter-connect systems, and distributes and sells certain electronic connectors manufactured by others.

AVX customers are multi-national original equipment manufacturers, independent electronic component distributors, and electronic manufacturing service providers. The Company markets its products through its own direct sales force and independent manufacturers' representatives, based upon market characteristics and demands.

AVX sells products to customers in a broad array of industries, such as telecommunications, information technology hardware, automotive electronics, medical devices and instrumentation, industrial instrumentation, transportation, energy harvesting, defense and aerospace electronic systems, and consumer electronics.

AVX has manufacturing facilities in North and Central America, Europe, and Asia.

General

AVX requires that all its facilities in the United States or abroad are committed to the principles of freedom to work and basic human rights. It is strictly prohibited for any AVX operation to take or hold worker passports, visas, or other work documents. All workers are free to leave AVX employment at any time without hindrance or financial or other penalty.

To ensure compliance, AVX corporate personnel audit each facility at least annually. Further, AVX has implemented a variety of reporting or "hot-line" mechanisms to permit any AVX employee to report any issue to the Corporate Compliance Officer which immediately triggers an investigation. All such reports are protected and retaliation for making such a report is strictly prohibited.

AVX also strictly observes all worker rights to communicate and organize in compliance with the ILO 18000 standards.

Among the practices that AVX strictly regulates at its facilities and by any organization that provides labor on a temporary or contract basis are:

- Workers may not be charged illegal or excessive recruitment fees;
- Workers must be clearly informed about terms of employment;
- When employment contracts are used, workers must be provided with understandable, legally compliant written contracts;
- No worker may be charged fees for travel, health checks, or work documentation;
- No worker may be subject to excessive or illegal wage deductions;
- No worker may be required to stay in company or broker-controlled housing;
- Workers must be able to enter or leave the premises freely;
- Workers will not be required to work excessive overtime;
- Worker identity documents may never be confiscated or withheld;

- Wage deductions may not be used as a disciplinary measure;
- Physically abusive or humiliating discipline and termination practices are prohibited;
- Worker’s visa and work permit may not be tied to a single employer (except when required by local law (e.g., Malaysia));
- Monetary penalties or withholding of wages may not be imposed for early contract termination;
- If workers are not from the region of the facility, they will not be forced to pay for return travel to their home; and
- Workers may never be forced to pay financial deposits or “security” fees as “runaway insurance.”

High Risk Areas

There are two high risk areas that AVX faces. First, on occasion, AVX uses employment agencies for temporary or contract workers. Second, AVX suppliers are located across the globe and can be difficult to monitor. As to the former, AVX is highly selective on the employment agencies with which it works and ensures that there are specific contractual clauses that address modern slavery issues. Further, AVX’s internal compliance reporting system is available to all such employees to report any violations. As to the latter, AVX’s procurement department determines which suppliers to physically audit as part of the overall compliance effort. All suppliers are reminded of the need to comply with SA 8000 and the RBA Code of Conduct as a condition of doing business with AVX.

AVX Policies

AVX promulgates and enforces a number of internal policies to ensure that it is conducting business in an ethical and transparent manner. These include:

- SA 8000 Policy requiring compliance with all aspects of that policy and explains how employees can report any violations;
- Anti-slavery policy which sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- HR policies governing recruitment, worker requirements, and anti-trafficking provisions.
- Whistleblowing/anti-retaliation policies which permit all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals and can, if they choose, do so anonymously through the AVX Compliance Hotline.
- AVX Code of Business Conduct. This code explains the manner in which we behave as an organization and how we expect our employees and suppliers to act.

Suppliers

AVX maintains policies applicable to all suppliers and maintains a preferred supplier list. AVX conducts due diligence on all suppliers before allowing them to become a supplier which includes screening to ensure that particular organisation has never been convicted of offenses relating to modern slavery and either pre-approval or ongoing on site audits of higher risk suppliers which include a review of working conditions. Compliance with SA 8000 is mandatory for all suppliers and specific anti-slavery provisions are included for high risk suppliers as noted above. Failure to comply will allow AVX to terminate any relationship for breach and barring such supplier from doing business with AVX.

AVX maintains an open dialog with all suppliers to ensure their understanding and compliance with these requirements as well as engaging in a risk-based analysis to determine if audits or inspections are necessary.

Performance Indicators

AVX determines the effectiveness of its program in several ways.

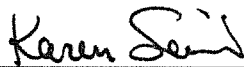
- The results of on-site monitoring of its own facilities and those of suppliers;
- Monitoring of news reports and other information publicly available about its suppliers;
- Evaluation of any reports through the compliance reporting system; and
- Participation in industry or business groups such as the Responsible Business Alliance and implementation of best practices as recommended by such groups.

Future Efforts

Eradicating slavery and human trafficking requires strong action and collaboration from business, governments, international organizations, and society as a whole. AVX is committed to reviewing its approach to human rights on a regular basis to ensure compliance with all laws and regulations, including the Modern Slavery Act, and with the fundamental human rights that these laws and regulations protect.

Approval For This Statement

This statement was approved by the Company and by AVX Limited on April 1, 2019 for its fiscal year April 1, 2019-March 31, 2020.



Karen Smith,
Chief Compliance Officer of AVX Corporation