



TE CONNECTIVITY

SUPPLIER CODE OF CONDUCT

**TEC-1015**

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TE Connectivity Ltd.

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## I. Introduction

Welcome to the *TE Connectivity Supplier Code of Conduct* (“**Code**”). TE has renamed this document, which was formerly titled the TE Connectivity Guide to Supplier Social Responsibility, because the scope has expanded beyond just social to emphasize the importance of other aspects of supplier responsibility including environmental, health and safety requirements. In this Code, we clarify the values and principles under which TE Connectivity (“**TE**”) operates as they relate to our suppliers and our business partners. The values, principles, and guidelines stated in this Code are demonstrated by TE in its day-to-day business operations. The purpose of this Code is to provide our suppliers with an understanding of TE’s expectations for business conduct, decision-making, and business interaction. It outlines key principles and behaviors, based on our Core Values, that we require of our Suppliers. We require our suppliers and business partners, as well as their employees, personnel, agents, subcontractors, and sub-tier suppliers (collectively, “**Suppliers**”) to embrace these principles and behaviors and to adhere to this Code when conducting business with or on behalf of TE. Suppliers are responsible for implementing programs designed to achieve conformance with this Code. TE also reserves the right to audit our suppliers on compliance with principles and behaviors established in this Code. In the case that any non-compliance with the principles and behaviors established in this Code is identified, TE will work with Suppliers to correct the situation, and we expect Suppliers to bring their operations into conformance with the Code in order to continue doing business with TE. The Code is located at: [TE Supplier Code of Conduct](#).

TE’s Core Values are at the center of our Supplier Responsibility Program (“**SRP**”), which we seek to promote throughout our supply chain. It is these same Core Values that are communicated to and documented for our employees internally in the *TE Connectivity Guide to Ethical Conduct*. Our SRP and the provisions of this Code are based on international standards of human rights, environmental sustainability, social responsibility, and ethical conduct, including:

- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Fundamental Conventions
- UN Universal Declaration of Human Rights

Additionally, TE is a signatory to and embraces the set of core values of the United Nations Global Compact.

TE believes that building a great company requires a deep understanding of the needs of our customers, our markets, and their commitments to supplier responsibility. In alignment with internationally recognized standards as listed in this Code, and drawing upon best practices in



global supply chains, these principles emphasize the responsibility of businesses to respect human rights, in addition to complying with applicable national laws. When there's a conflict between national law and the requirements of this Code, Suppliers should seek to prioritize the higher standard wherever possible.

## II. TE's Core Values

TE's commitment to the highest standards begins with ensuring that everyone across the TE organization and our supply chain understands and demonstrates our Core Values and adheres to our social responsibility platform. Core Values are the concepts that define how we conduct ourselves as TE employees and decision-makers at the individual, team, and company levels. We believe it is critical that our Suppliers understand, share, and apply our Core Values in their own operations and business interactions. The following five Core Values are the foundation of TE operations and, as such, are also the foundation for our Code.

### *Integrity: Do the right thing*

We demand of ourselves, our partners and each other the highest standards of ethics and integrity. We are dedicated to diversity, fair treatment, mutual respect and trust.

### *Accountability: Take Responsibility*

We honor the commitments we make to our customers, shareholders and each other. We accept personal responsibility for our actions and results. We challenge each other to achieve excellence.

### *Inclusion: Be inclusive*

We build teams, at all levels in TE, representing the global markets we serve. We value differing backgrounds, perspectives and opinions in driving business results. We are committed to the safety and wellbeing of our colleagues.

### *Innovation: Innovate*

We innovate, as the foundation of our business, to create value. We challenge ourselves to bring new innovations to life, and value entrepreneurial decision making, pace and openness to change.

### *Teamwork: Win Together*

We collaborate across boundaries at pace to win. We communicate transparently and practice leadership that inspires, empowers and develops our full potential to exceed stakeholder expectations.



### III. Labor and Human Rights

#### A. Providing Opportunity for All

TE extends equal opportunity and fair treatment to all its employees in all employment practices, including those related to recruiting, hiring and training; promotions, pay and benefits; and transfers and workforce reductions. TE specifically prohibits discrimination on various dimensions, including, but not limited to, age, citizenship status, color, disability, ethnicity, gender, gender identity, gender expression, national origin, race, religion, sex, sexual orientation, veteran status or any other status classification protected by applicable law or regulation. TE is committed to providing a culture that values diversity and teamwork with a conscious desire to achieve understanding, respect, inclusion, and continuous learning. We expect that all employees treat one another with respect and dignity.

We extend these same principles to the relationships throughout our supply chain with our Suppliers and customers. One of the included principles is the promotion and encouragement of Supplier Diversity within our supply base. Supplier Diversity is a business strategy that ensures a diverse supplier base in the procurement of goods and services in any business. It emphasizes the creation of a diverse supply chain that works to secure the inclusion of diverse groups in its procurement plans.

#### B. Human Rights

TE complies with all applicable human rights laws and principles in the locations where the company operates around the world. We require our Suppliers to do the same.

We require TE business units and Suppliers to provide clean and safe working environments and conditions for employees, forbid child labor and all forms of forced labor at our facilities or at the facilities of our Supplier subcontractors and require that employees receive all benefits and protections mandated by applicable laws. Regardless of location, TE prohibits our business units or Supplier associates from engaging in activities that do not maintain individual dignity and respect, even if permissible under applicable law. Our Core Values show commitment to acting in a socially responsible manner in the communities where we live and work. TE condemns any act or omission which is capable of impairing labor and human rights and expects its Suppliers to respect the rights outlined in the Code.

TE supports the following specific Labor and Human Rights principles at TE and for our Suppliers:

##### 1. Freely Chosen Employment

All employment will be voluntary, and workers should be free to leave upon reasonable notice. Workers will not be required to surrender government-issued identification, passports or work permits as a condition of employment, except for the purpose of legal status verification, in which case the documents must be promptly returned to the worker. All forms of forced labor and



slavery by our Suppliers are forbidden. The use of forced labor, bonded labor (including debt bondage), indentured labor, or involuntary or exploitive prison labor, any of which may be identified by indicia such as labor obtained under the threat of punishment, withholding identity papers, or requiring workers to deposit a bond or any other financial or other constraint, whether directly or indirectly, is strictly prohibited. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. Compliance with this prohibition against all forms of forced labor and slavery is mandatory, and materials may not be sourced from regions prohibited by US or international law. Suppliers must ensure their supply chain does not utilize forced labor or child labor in the manufacturing of their raw materials or finished products. Workers will not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees will be repaid to the worker.

## 2. Child Labor

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship or student programs, which comply with all laws and regulations, is supported. Management of student workers will be ensured through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Workers under the age of 18 should not perform hazardous work and may be restricted from night work with consideration given to educational needs.

## 3. Working Hours

Work weeks are not to exceed the maximum allowable hours set by local law. Further, a work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime will be voluntary. Workers will be entitled to periodic rest breaks during shifts and at least one day off every seven days.

## 4. Wages and Benefits

Compensation paid to workers will comply with all applicable wage laws, including those relating to minimum wages, overtime rates, and legally mandated benefits such as health insurance and retirement contributions. In compliance with local laws, workers will be compensated for overtime at pay rates greater than regular hourly rates. The basis on which workers are paid will be clearly provided in a timely manner via pay stub or similar documentation. Deductions from wages as a disciplinary measure will not be permitted. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.





## 5. Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or abuse, or verbal abuse of workers, nor is there to be the threat of any such treatment.

## 6. Non-Discrimination

Our Suppliers must be committed to a workforce free of harassment and unlawful discrimination. Suppliers will not engage in discrimination based on various dimensions, including, but not limited to, age, citizenship status, color, disability, ethnicity, gender, gender identity, gender expression, national origin, race, religion, sex, sexual orientation, veteran status or any other status classification protected by applicable law or regulation, in hiring and/or in employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way as a condition of employment.

## 7. Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to address and resolve workplace and compensation issues. Our Suppliers must respect the rights of workers to associate freely and bargain collectively, to join or not join labor unions, to seek representation, and to join works councils in accordance with local laws. Workers will be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers will be allowed to elect and join alternate lawful forms of worker representations.

## 8. Environmental Impact on Local People

Our Suppliers must ensure that local people are not impaired by their business activities, e.g., through harmful soil contamination, water pollution, air pollution, deforestation, harmful noise emission, excessive water consumption or endangering biodiversity which impact the natural resource basis for the preservation and production of food, access to safe drinking water and sanitary facilities.

## 9. Unlawful Eviction of Land

Our Suppliers must respect the rights of residents, people and communities affected by their business activities and will not unlawfully evict or deprive people of their homes, lands, and/or waters.

## 10. Prohibition of Violent Security Forces

Hiring or using violent private or public security forces is prohibited. Suppliers must not use any security forces for the protection of their entrepreneurial activities if the security forces torture



people; treat them in a cruel, inhumane, or degrading way; use excessive force leading to injuries of life or body; or impair the freedom of assembly and association.

## 11. Responsible Sourcing of Minerals and Materials

TE Suppliers will adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

To meet necessary global due diligence and traceability laws, regulations and customer requirements, TE Suppliers are obligated to disclose to TE any minerals or materials sourced from conflict affected areas (commonly referred to as “Conflict Minerals”) used in the production of any product(s) supplied to TE. Conflict Minerals include any mineral, material or metal as defined under the following, without limitation: (i) Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act, (ii) the European Union (EU) Conflict Minerals Regulation, (iii) other applicable law (if and as applicable), or (iv) otherwise identified by TE (even if such mineral, material or metal is not from a conflict affected area). For example, TE may request information regarding other minerals or materials to satisfy customer or legal requests. When requested by TE, Suppliers must provide all necessary documentation requested by TE regarding its due diligence processes and program in a timely manner including, without limitation, the measures taken to identify the source and chain of custody of such Conflict Minerals used in its products. Such requests may be conducted in the form of a supplier survey, inquiry, or similar request to comply that may be provided to Suppliers by TE.

Avoidance of sourcing from “conflict mines” is a very serious issue, and we have been actively working with industry groups, customers, and our Suppliers to increase supply chain transparency toward that goal. Accordingly, TE reserves the right to request that our Suppliers use all commercially reasonable efforts to supply commodity metals to TE that are “conflict-free” and certify to such a designation whenever possible.

## IV. Health and Safety

### A. Making Workplace Safety and Security a Priority

Having a safe workplace is one of the most important benefits we offer to our employees. We are committed to providing a safe working environment for all employees. We do this by following strict safety and security rules and practices, which we also require our Suppliers to follow, including the ones listed below:

- Identifying workplace hazards and implementing effective controls to reduce, or eliminate where possible, risk of injury and illness.



- Requiring workers to take an active role in working safely by adhering to safety procedures.
- Providing comprehensive training programs and adopt clear, written standards to define workplace operational safety requirements.
- Prohibiting the possession of weapons and other dangerous devices by employees, contractors, Suppliers, and visitors at all times on the company's, customers', or Suppliers' property, including parking lots and company-owned vehicles.

While compliance with all applicable laws, regulations, and record-keeping requirements is mandatory, TE seeks to exceed the minimum legal standards. It is our goal to be recognized as an industry leader in safety and we expect our Suppliers to also seek such recognition. Suppliers will follow TE Specification *EHS Requirements for Contractors* (TEC-124-115), which describes TE's Environmental Health & Safety (EHS) requirements for contractors.

TE supports the following Health and Safety principles and practices internally and by our Suppliers:

### 1. Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, chemical, machine, fire, vehicle, and fall hazards) is to be controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tag out). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment. Gender-responsive measures must be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers. Workers will not be disciplined for raising safety concerns.

### 2. Proper Physical Conditions

Suppliers must ensure that all facilities and equipment are in good working condition and comply with relevant safety standards. This includes maintaining structural integrity, proper lighting, ventilation, and ensuring all pathways and workspaces are free from obstructions.

### 3. Effective Housekeeping

Suppliers are responsible for maintaining clean and orderly work environments. Regular cleaning schedules must be implemented to remove waste, debris, and other potential hazards. All materials and equipment should be stored properly to prevent accidents and facilitate efficient workflow, observing common principles of 5S.



#### 4. Hazard Mitigation

Suppliers are required to identify, assess, and mitigate potential hazards in the workplace. This includes conducting regular risk assessments, implementing control measures, and ensuring that all employees are trained to recognize and respond to hazards effectively.

#### 5. Emergency Preparedness

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including, emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

#### 6. Occupational Injury and Illness Reporting and Investigation

Procedures and systems are to be in place to manage, track and report occupational injury and illness. Incidents of injury and illness must be fully investigated to determine the true root cause(s) and corrective actions that will be effective in preventing recurrence must be implemented.

#### 7. Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.

#### 8. Physically Demanding Work

Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

#### 9. Machine Safeguarding and Lock-out, Tag Out

Physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers. Regular employee training and machine inspections must occur to ensure safeguarding protections remain in place and are effective. Procedures to control the release of hazardous energy, i.e., Lock-out, Tag-out procedures must be in place and workers must be properly trained to ensure safe interaction with machines. Supplier must ensure that machines are locked out and properly shut off and not able to be started up again or release



energy during maintenance, repair work, or other interaction with machines that could cause serious injury if not controlled.

## 10. Dormitory and Canteen

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by Suppliers, or a labor agent, are to be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

## 11. Training and Competence

Maintain Health and Safety comprehensive training programs to ensure that employees receive effective, ongoing information and training on the workplace hazards designed to reduce or eliminate the risk of workplace injuries. Employ professional Health and Safety staff in the design and facilitation of workplace safety protocols.

### B. Substance-Free Workplace for The Well-Being of Employees and Visitors

Substance abuse, whether alcohol or drug abuse, poses a serious threat to the safety, health, and productivity of our organization, employees, and customers. TE has a substance-free workplace policy that extends to locations worldwide and applies to our employees, Suppliers, customers, and visitors.

Our substance-free workplace policy prohibits:

- Using, selling, or possessing illegal drugs or other controlled substances in the workplace. Possession of prescription medication for personal medical treatment in accordance with a physician's order is permitted; and
- Using or possessing alcohol in the workplace, unless specifically approved by both the highest-ranking management employee and the human resource manager at a particular location; and
- Being under the influence of alcohol, illegal drugs, or any other controlled substance on the job.

Our Suppliers must adopt policies similar to those above for their own locations.

## V. Environmental Responsibility

Environmental responsibility is critical to being a world-class organization and producing world-class products. TE adheres to the following environmental principles internally and requires the same of our Suppliers:

### 1. Environmental Laws, Permits and Reporting

Suppliers are required to comply with all applicable environmental laws, regulations and reporting requirements. All required environmental permits (e.g., wastewater, waste disposal



and air emissions) and registrations (including, but not limited to, general, air, water, and waste) are to be obtained, maintained, and kept current and their operational, monitoring and reporting requirements are to be followed.

## 2. Pollution Prevention and Resource Conservation

Hazardous waste and pollutants of all types, including water and energy, is to be reduced or eliminated at the source or by practices such as product design/engineering, modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

## 3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, animals or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data will be tracked and documented. Hazardous substance substitutions for more eco-friendly alternatives are encouraged.

## 4. Wastewater and Solid Waste

Wastewater, e-waste, and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled, and treated as required prior to discharge or disposal. A waste minimization plan will be established.

## 5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, treated, and reported as required prior to discharge. All necessary and required permits must be obtained and the Supplier must be in full compliance of the requirements.

## 6. No Unauthorized Discharges or Disposals

Suppliers will not directly or indirectly dispose of liquid or solid waste onto or into the ground, into any body of water or into a wastewater disposal system except in compliance with a permit or other express regulatory authorization. Nor will a Supplier directly or indirectly emit any toxic, hazardous, or ozone depleting gas or vapor into the atmosphere except in compliance with a permit or other express regulatory authorization. Any significant violations or penalties must be reported to TE.

## 7. Energy Consumption and Greenhouse Gas Emissions

TE recognizes its responsibility to protect the environment. We expect Suppliers to share our commitment by responding to changes posed by climate change and working toward protecting the environment. Supplier disclosure is a first step in understanding our Suppliers' maturity on our carbon reduction journey and to help us better manage the environmental footprint of our



supply chain while encouraging Suppliers on their own journey toward a low-carbon economy. As part of this commitment, Suppliers will establish and report annually on greenhouse gas (“GHG”) data for all products and related services supplied to TE. Suppliers who provide direct commodities to TE will follow TE Specification *Supplier Requirements for Product Carbon Footprint (PCF) Calculation Specification of Materials* (TEC-16-03) to ensure proper life cycle assessment is followed. Energy consumption (including renewable) and all relevant Scope 1 and 2 greenhouse gas emissions (using the GHG protocol) will be documented, tracked and submitted to TE. Where such tracking is not currently available, Suppliers will establish a plan to implement tracking within one year of receipt of this Code or onboarding as a new TE Supplier and provide the data and/or components required to calculate GHG emissions. Suppliers will participate in TE’s Supplier Engagement Program which offers webinars and resources designed to support Suppliers on a range of GHG-related topics. Suppliers will also respond to TE’s sustainability requests in a timely manner. In addition to data disclosure, Suppliers will explore ways to improve energy efficiency, optimize the utilization of sustainable materials, maximize procurement of renewable energy, and to minimize both their overall energy consumption and GHG emissions. TE Suppliers will share their reduction activities bi-annually.

#### 8. Product/Material Composition Restrictions

At TE, we are committed to continuously reduce the negative impact our products and activities may have on human health and the environment, which includes avoiding the use of hazardous substances in our products and in our manufacturing processes. Therefore, TE Suppliers must adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal. Suppliers who provide direct commodities to TE will follow TE Specification *Supplier Requirements for Product Environmental Compliance* (TEC-138-702). Promptly upon request from TE, the Supplier will provide the composition of their products to support statement of compliance and provide verifications detailing their ongoing testing and auditing of supply base to ensure compliance with all regulations and customer-specific requirements.

#### 9. Biodiversity, Land Use and Deforestation

TE recognizes the inherent value of biodiversity and the importance of protecting against deforestation or loss of biodiversity. Suppliers will monitor the impact of their operations on ecosystems, and work across supply chains to ensure those operations do not contribute to deforestation or loss of biodiversity.

## VI. Ethics

The *TE Connectivity Guide to Ethical Conduct* defines TE’s ethical standards of business conduct and provides a framework for promoting the highest standards of integrity in business practices. In considering how to act in issues of social responsibility, ethics, and integrity play a key role in





making good decisions. As such, the *TE Connectivity Guide to Ethical Conduct* is incorporated into this Code, as its principles are the foundation upon which this Code rests.

*TE Connectivity Guide to Ethical Conduct* found at: <http://www.te.com/usa-en/about-te/corporate-responsibility/governance/ombudsman/ethical-conduct.html>

To meet social responsibilities and to achieve success in the marketplace, Suppliers will uphold the highest standards of ethics including the following:

### 1. Business Integrity

Suppliers must conduct business openly and transparently. The highest standards of integrity will be upheld in all business interactions. Suppliers will have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

### 2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage will not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures will be implemented to ensure compliance with anticorruption laws. Suppliers should avoid any conflicts of interest in any business dealings with TE. Disclosure to TE of conflicts of which a Supplier is aware will occur prior to the establishment of business relationship with TE or, where a Supplier becomes aware of such a conflict at a later point in time, disclosure will be made immediately upon discovery, to allow TE the opportunity to take appropriate action. Conflicts of interest arise when the interests, activities, or relationships of a Supplier interfere – or appear to interfere – with its relationship with TE. Examples of such conflicts of interest may include, without limitation, ownership or a beneficial interest held by a government official, representative of a political party, TE employee in a Supplier's business.

### 3. Disclosure of Information

All business dealings will be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance will be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.





#### 4. Intellectual Property

Intellectual property rights will be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and Supplier information will be safeguarded.

#### 5. Fair Business, Advertising and Competition

Applicable laws and regulations and market standards of fair business, advertising, and competition will be upheld.

#### 6. Non-Retaliation

Suppliers should have a well-communicated process for their employees, agents or business partners to raise concerns of misconduct without fear of retaliation. This process should protect the identity of those reporting such concerns, and prevent any potential retaliation, including prevention of retaliation against those reporting misconduct or against victims of the alleged misconduct.

#### 7. Privacy

Suppliers will commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including Suppliers, customers, consumers, and employees. Suppliers will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

### VII. Responsibility and Compliant Business Practices

#### A. Global Trade Compliance

##### Growing our global business in a complex world of regulations

Most countries have trade laws and regulations, which relate to export and import, and comprehensive and targeted sanctions (“**global trade laws**”). Global trade laws regulate the export and import of items, both physical and intangible, including production materials, finished and unfinished goods, capital equipment, molds and tooling, samples, and prototypes, as well as software, services and technical information. In addition, sanctions may also regulate TE’s financial dealings in certain countries or regions, or with specific parties. Failure to comply with applicable global trade laws may result in civil and criminal penalties, loss of export and import privileges, and damage to a company’s brand and reputation. TE complies with applicable global trade laws of all jurisdictions in which it operates.

Cross-border transactions may be subject to multiple jurisdictions depending on where items (including technology) are sourced, manufactured, and transferred. Many export control laws have extraterritorial reach and regulate re-export and in-country transfers.



To ensure compliance with all applicable trade laws, Suppliers will implement appropriate global trade compliance policies, procedures, and proper internal trade compliance controls including but not limited to the following controls:

- Evaluating the applicability of sanctions, export, and import laws on your transactions with TE and ensuring compliance with those laws;
- Obtaining any required authorization from any government agencies to support your work with TE;
- Screening business partners, including contract manufacturers and subcontractors against relevant governments' restricted parties lists;
- Disclosing or transferring technical data to foreign nationals either in the U.S. or abroad;
- Executing, controlling, and delivering required documentation; and
- Retaining records for the above.

TE may require evidence of compliance with applicable global trade laws, and Supplier will provide such evidence within a reasonable time frame.

#### B. Supply Chain Security

Suppliers must also comply with the minimum security criteria of the applicable global supply chain security programs, including but not limited to the U.S. Bureau of Customs and Border Protection's Customs-Trade Partnership Against Terrorism (C-TPAT) program, Authorized Economic Operator ("AEO"); and Canada Border Services Agency's Partners in Protection Program ("PIP"), to the extent that these criteria are relevant for Supplier's operations.

TE may require evidence of compliance with the security criteria of the applicable global supply chain security programs, and Supplier will provide such evidence within a reasonable time frame.

#### C. Supply Chain Mapping

TE may require its Suppliers to conduct and support supply chain mapping by providing evidence of its compliance with the applicable trade laws, regulations, or government directives or guidance and supporting documents as required by the applicable government authorities or upon TE's request.

Suppliers will be required to provide evidence that demonstrates (i) the identity and location of Supplier's subcontractors and sub-tier suppliers and (ii) the origin of its products and any component and raw materials in its products (collectively "**Supply Chain Mapping Evidence**") to comply with TE's request, applicable regulatory requirements, supply chain security programs, directives, or guidance from the applicable government authorities. Supply Chain Mapping Evidence may be requested by TE in the following two (2) situations:



- 1) As part of a supply chain mapping audit or request for information, Suppliers will, promptly, following a request from TE, provide to TE or to a related third-party the Supply Chain Mapping Evidence; or
- 2) If a customs authority detains Supplier products or TE products which contain Supplier products at a customs port, Suppliers will assist TE with responding to questions regarding products and provide any documents required to ensure such products meet the applicable customs requirements. Suppliers will also reimburse TE for any holding, transfer, or additional fees that TE incurs related to Supplier products being detained at the border (“**Detention Costs**”). Additionally, in case a TE product is being detained at the border and it can be verified that the underlying reason for such detention is the Supplier product, Suppliers will reimburse TE for any incurred Detention Costs.

Supply Chain Mapping Evidence may include, but is not limited to, the following:

- 1) Detailed description of the supply chain for Supplier products and components, including all stages of mining, production, or manufacture, including any step of the sourcing, manufacturing, or processing of goods;
- 2) Records that indicate the provenance and chain-of-custody of each component of Supplier products; and
- 3) Any additional information requested by the applicable customs authorities or TE.

## VIII. Proprietary and Confidential Information

### Protecting the Company’s Knowledge

TE’s Proprietary and Confidential Information (defined as business and technical information that is not generally or publicly known by others) is very valuable because it provides TE, and our supply chain, with a competitive market advantage.

TE Suppliers must protect and respect TE’s Proprietary and Confidential Information by maintaining strict confidentiality of information provided to them by TE, or to which they are circumstantially exposed as a result of their business interactions with TE, and by not sharing that information outside of their company or with those inside their company who do not need to know about it as part of their jobs. TE’s Proprietary and Confidential Information should be used by TE Suppliers solely for the benefit of TE. Examples of TE’s Proprietary and Confidential Information include, but are not limited to:

- TE confidential specifications and confidential drawings, such as engineering/production specifications and production drawings for potential new products, as well as non-public specifications and confidential drawings for current products;



- TE technical information such as trade secrets, invention disclosures, un-filed or non-published patent applications, and any other non-public technical information;
- Agreements between TE and its Suppliers, agents, strategic partners and/or other third parties;
- TE company financial information including all non-public sales information;
- TE proprietary software or company-owned software modifications, templates, worksheets, or other programs;
- TE financial, business, technical and other information about potential acquisitions and/or divestitures;
- TE business information such as plant layouts, financial forecasts, organizational charts, organizational announcements, staffing changes, business updates or product news and product roadmaps that are not publicly available; and
- TE customer lists and agreements, market share data, Supplier agreements, purchase order data to Suppliers, and other similar confidential information.

## IX. E-Mail, The Internet, and The Use of Company Property

### Limiting Use to Business Purposes

All communications data and information sent or received using TE equipment or assets are TE property and are not private communications. TE owns and/or controls access to all communications equipment, including computers, telephones, software, e-mail, instant messaging, text messaging, chat messages, voice mail, conferencing equipment, company cell phones, handheld devices, and office supplies. TE reserves the right to monitor all communications, including internet usage, to the extent permissible by law.

TE's tangible property, including but not limited to, its buildings, parking lots, vehicles, equipment, production scrap materials and supplies, exists to enable employees to perform their business-related duties, including interacting and transacting business with our supplier base. TE also has intangible property, including but not limited to, know-how, processes, and intellectual property such as patents and copyrights. The use of TE's property (tangible or intangible) is for the sole purpose of conducting business-related tasks.

This policy extends to our Suppliers in the use of such communications devices as listed above and including all communications methods with TE, such as e-mail, the internet, or any TE-owned software or TE-owned property that our Suppliers use, for example:

- Communications between TE and our Suppliers via e-mail and internet, as well as any other forms of communication, must not violate this Code or any other TE policy, particularly the sections related to conflicts of interest and/or disclosure of TE confidential information.



- Communications between TE and our Suppliers must never include forwarding of chain letters, mass e-mails for non-business purposes, or selling items or services for personal gain.
- Communications between TE and our Suppliers must never contain pornographic or offensive material, discriminatory or harassing language or derogatory references to age, citizenship status, color, disability, ethnicity, gender, gender identity, gender expression, national origin, race, religion, sex, sexual orientation, veteran status or any other status classification protected by applicable law or regulation.

## X. Management Systems

At TE, supply chain sustainability is an evolving vision, which means that it is critical to have an approach that defines and incentivizes continuous improvement. This approach at TE includes both the remediation of instances of non-compliance as well as investment in Suppliers' management capabilities.

Remediation can include a number of activities:

- TE and Suppliers working together to create a corrective action plan for achieving compliance in a clearly defined and reasonable time frame;
- Encouragement for improvement through regular communications with non-compliant Suppliers;
- Defining a roadmap for gradually increasing standards and expectations; and
- Termination of a Supplier relationship when serious compliance issues are not remedied despite repeated notifications.

TE's Supplier selection includes consideration of a Supplier's performance in these areas:

- TE recommends that Suppliers begin their own sustainability journey. As an important step in that journey, TE encourages Suppliers to join and participate actively in the United Nations Global Compact. Joining the Global Compact is a sign that the Suppliers are taking sustainability issues seriously.
- TE Suppliers will adopt or establish a management system designed to track: (a) compliance with applicable laws, regulations, and customer (including TE) requirements related to the Supplier's operations and products; (b) conformance with the principles stated in this document; and (c) identification and mitigation of operational risks. The management system embraced by Suppliers must also facilitate continual improvement.

The management system as implemented by our Suppliers should contain the following elements:



### 1. Company Commitment

Corporate social and environmental responsibility statements affirming commitment to compliance and continual improvement.

### 2. Management Accountability and Responsibility

Clearly identified company representatives/employees responsible for tracking implementation and conducting periodic review of the status of the management systems.

### 3. Legal and Customer Requirements

Identification, monitoring, and understanding of applicable laws, regulations, and customer requirements.

### 4. Risk Assessment and Risk Management

A process to identify the environmental, health and safety and labor practice risks associated with company operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to ensure regulatory compliance to control the identified risks. Areas to be included in a risk assessment for health and safety are warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities/ bathrooms, kitchen/cafeteria, and worker housing /dormitories.

### 5. Performance Objectives with Implementation Plan and Measures

Written standards, performance objectives, targets and implementation plans including a periodic assessment of company performance against those standards, objectives, and plans.

### 6. Training

Programs for training managers and workers to implement policies, procedures, and improvement objectives.

### 7. Communication

Process for communicating clear and accurate information about TE performance, practices, and expectations to workers, Suppliers, and customers.

### 8. Worker Feedback and Participation

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

### 9. Audits and Assessments

TE expects Suppliers to have a general duty of cooperation. The Supplier will cooperate with TE's due diligence process and remedy any violations of the TE standards in its own business and its supply chain. At the request of TE, the Supplier is obliged to participate in periodic audits, assessments or self-evaluations to ensure conformity to legal and regulatory requirements, the



principles and guidelines outlined in this Code, and contractual requirements related to social and environmental responsibility, which may be performed by a third-party company. All TE and Supplier information provided for the purpose of conducting periodic audits, assessments, or self-evaluations shall be treated as confidential and, except where required by law, shall not be disclosed or used for any purpose except to verify Supplier compliance with its obligations under this Code.

#### 10. Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

#### 11. Documentation and Records

Creation of documents and records to ensure regulatory compliance and conformity to TE requirements along with appropriate confidentiality to protect privacy.

### XI. Record-Keeping and Financial Controls

#### A. The Information by Which We are Measured

Accurate, timely, complete financial records provide the key information necessary to manage our businesses. These records and financial controls also are essential to fulfilling obligations to shareholders, governments, and the general public at large. We require our Suppliers to follow appropriate procedures and commitment to financial responsibility including creating and retaining adequate records. In general, our Suppliers must:

- Have effective internal financial controls, including procedures to protect assets; and
- Comply with all applicable laws and Supplier's own records retention policies so that all necessary archival records can be accessed.

#### B. Communicating Accurate, Timely Information

In all interactions and communications – between TE and our Suppliers, customers, distributors, governmental agencies, or others inside or outside of the company -- TE employees are expected to be truthful and forthright, and we require the same of our external Suppliers. This includes:

- Making accurate statements without misrepresentation, omissions or statements intended to mislead or misinform; and
- Responding promptly, accurately and with full disclosure to requests from governmental agencies for information or documents

### XII. Supplier Concerns

As a TE Supplier, your role includes understanding TE's values and principles, including all regulations that apply equally to your company and its interaction with TE. Our Core Values of



Integrity, Accountability, Inclusion, Teamwork, and Innovation are so important to us that we believe it is the responsibility of each and every one of us to speak up if we become aware of any situation that violates these values.

#### A. Reporting a Concern

We encourage our employees, as well as Suppliers, investors, customers, and other third parties, to promptly report any concerns of potential violation of laws, regulations, and TE policies via any of TE’s confidential reporting channels, including ConcernNET, ConcernLINE, ConcernAPP or by email at [directors@te.com](mailto:directors@te.com). Both the ConcernNET web reporting platform and the ConcernLINE hotline numbers can be found at [www.concernnet.com](http://www.concernnet.com), and ConcernAPP can be accessed by scanning the below QR code. All are available 24 hours a day, seven days a week.



#### B. TE Office Of Ombudsman

All reports of potential violations are taken seriously and appropriately reviewed and handled by the TE Office of Ombudsman. The TE Office of Ombudsman is an independent, impartial, and confidential resource which employees, Suppliers, investors, customers, and other third-parties can report concerns of potential violations. Reporting to the Audit Committee of the TE Board of Directors, the TE Ombudsman operates independently from the business functions, and ensures that all reported concerns are investigated and resolved timely, confidentially, and appropriately at the proper level. Additional information regarding the TE Office of Ombudsman may be found at the link below:

<https://www.te.com/usa-en/about-te/corporate-responsibility/governance/ombudsman.html>