

CODE OF CONDUCT

The Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC), Code of Conduct establishes standards to ensure that working conditions in the electronics industry, or industries in which electronics are a key component, and its supply chains are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

Considered as part of the electronics industry for purposes of this Code are all organizations that may design, market, manufacture, or provide goods and services that are used to produce electronic goods. The Code may be voluntarily adopted by any business in the electronics sector and subsequently applied by that business to its supply chain and subcontractors, including providers of contract labor.

TE Technology, Inc. (TETECH) adopts the Code as outlined below and expects its suppliers to have a similar Code of Conduct.

Fundamental to adopting the Code is the understanding that in all its activities, TETECH must operate in full compliance with the laws, rules, and regulations of the countries in which it operates. (The code is not intended to create new or additional third-party rights.)

The Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D outlines standards relating to business ethics. Section E outlines the elements of an acceptable system to manage conformity to this Code.

A. LABOR

TETECH is committed to uphold the human rights of workers, and to treat them with dignity and respect. This applies to all workers including temporary, migrant, young workers, contract, direct employees, and any other type of worker.

1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons, including the transporting, harboring, recruiting, transferring, or receiving of persons by means of threat, force, coercion, abduction or fraud for labor or services shall not be permitted. There shall be no unreasonable restrictions on workers' freedom of movement in the facility or on entering or exiting company-provided facilities such as, if applicable, workers' dormitories or living quarters.

As part of the hiring process, all workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. TETECH or its agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. TETECH can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay TETECH or its agents recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

2) Young Workers

TETECH shall not employ under-aged labor. The term "under-aged" refers to any person under the age of 15 or under the minimum age for employment in the country, whichever is greatest. Appropriate mechanisms shall be used to verify the age of workers.

Workers under the age of 18 ("young workers" not otherwise under-aged) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Maintenance of young worker records, coordination with educational partners along with legitimate workplace learning programs, and protection of young workers' rights in accordance with applicable laws and regulations shall be ensured. In the absence of local law, the wage rate for young workers shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3) Working Hours

Working hours shall not exceed the maximum set by local law. In any case, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch, and outsourced labor will be within the limits of the local law.

5) Humane Treatment

Workers shall not be subjected to harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse; nor shall there be any threat of such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6) Non-Discrimination/Non-Harassment

TETECH is committed to a workplace free of harassment and unlawful discrimination and shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers shall not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

7) Freedom of Association

In conformance with local law, TETECH respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly; likewise, TETECH respects the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

B. HEALTH AND SAFETY

TETECH recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale. TETECH also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

1) Occupational Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, and mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, implementing preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training.

Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, along with educational materials about risks associated with these hazards. Reasonable steps shall be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, and provide reasonable accommodations for pregnant women and nursing mothers.

2) Emergency Preparedness

Potential 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. Emergency drills must be executed at least annually or as required by local law.

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.

3) Occupational Injury and Illness

Procedures and systems shall be implemented to prevent, manage, track, classify and report occupational injury and illness. Worker reporting of occupational injury or illness shall not be discouraged. Necessary medical treatment shall be offered. Occupational injury/illness shall be investigated, and corrective actions shall be implemented to eliminate causes and facilitate the return of workers to work.

4) Industrial Hygiene

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards are identified, opportunities to eliminate and/or reduce the potential hazards shall be implemented when possible. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

5) Physically Demanding Work

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

6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories, if applicable, are to be maintained for cleanliness and safety, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heating and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

Workers shall be provided with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers. Workers shall be encouraged to raise any health and safety concerns without retaliation.

C. ENVIRONMENT

Environmental responsibility is integral to producing world-class products. Environmental impacts shall be addressed to minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public.

1) Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

2) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3) Hazardous Substances

Chemicals, waste, and other materials that pose a hazard to workers or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

4) Solid Waste

A systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous) shall be implemented.

5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as lawfully required prior to discharge.

Ozone- depleting substances are to be effectively managed in accordance with applicable regulations. Routine monitoring of the performance of air emission control systems shall be conducted.

6) Materials Restrictions

All applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal shall be followed.

7) Water Management

A water management program that documents, characterizes, and monitors water sources, use and discharge shall be implemented for all water used in production of product. Opportunities to conserve such use of water and to control channels of contamination shall be sought. All wastewater resulting from production is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance shall be conducted.

8) Energy Consumption and Greenhouse Gas Emissions

Methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions should be sought and implemented wherever practical.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, the highest standards of ethics are to be maintained.

1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. TETECH has a zero-tolerance policy of prohibiting all forms of bribery, corruption, extortion, and embezzlement.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to 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, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

However, gifts (such as branded promotional items and annual holiday gifts other than cash) having a reasonably estimated fair-market value of \$100 USD or less may be accepted provided the gifts are consistent with industry practices and applicable law and could not reasonably be construed as bribe, payoff, or other similarly prohibited action. A cash gift, regardless of amount, is not acceptable.

3) Disclosure of Information

Business dealings shall be transparently performed and accurately reflected on the business books and records. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Records or conditions or practices shall not be falsified or misrepresented.

4) Intellectual Property

Intellectual property rights are to be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights. Customer and supplier information is to be safeguarded.

5) Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition are to be upheld.

6) Protection of Identity and Non-Retaliation

The confidentiality, anonymity, and protection of whistleblowers (defined as any person who makes a disclosure about improper conduct by an employee or officer of a company or by a public official or official body) shall be maintained, unless prohibited by law. Persons can raise any concerns without fear of retaliation.

7) Responsible Sourcing of Minerals

TETECH supports responsible sourcing practices for tantalum, tin, tungsten, gold, and other relevant minerals used in its products consistent with the Organization 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.

TETECH shall make a reasonable, good-faith effort with its conflict minerals reporting in support of its customers' compliance requirements with the Conflict Minerals provision of the Dodd-Frank Act.

8) Trade Compliance and Export Controls

TETECH complies with applicable export, re-export, and import regulations (such as ITAR, OFAC, and EAR) associated with the United States and corresponding countries of its suppliers and customers. Restricted-party screening is performed on customers, suppliers, freight forwarders, and other related entities to ensure no transactions occur with denied, debarred, or restricted entities, persons, or countries. Furthermore, TETECH does not participate in boycotts that are not otherwise sanctioned by the United States government.

9) Privacy

TETECH commits to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, and employees. Compliance with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared shall be maintained.

E. MANAGEMENT SYSTEMS

TETECH seeks to comply with this Code in conjunction with applicable laws, regulations, and customer requirements related to its operations and products. Operational risks are to be identified and mitigated.

1) Company Commitment

TETECH is dedicated to providing quality products and service which meet or exceed our customers' expectations through a commitment to excellence in integrity, ethics, and continuous improvement.

2) Management Accountability and Responsibility

TETECH maintains an organization chart identifying management positions. Regular meetings are held to address immediate and long-term planning.

3) Legal and Customer Requirements

Applicable laws, regulations, and customer requirements are reviewed to ensure compliance.

4) Risk Assessment and Risk Management

Regular meetings are held to review risks to compliance with laws along with risks to environmental, health/safety, labor practices, and ethics associated with operations (including production areas, warehouse, equipment, laboratories, sanitation, kitchen/cafeteria, and housing). Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance are implemented where possible.

5) Improvement Objectives

A periodic assessment of performance in achieving those objectives is performed.

6) Training

Training is provided to personnel as needed for proper implementation of TETECH's policies and applicable legal and regulatory requirements.

7) Worker Feedback, Participation and Grievance

Workers may freely express grievances and provide feedback, anonymously if so desired, without fear of reprisal or retaliation.

8) Audits and Assessments

Self-evaluations are performed to ensure conformity to legal, regulatory, and contractual requirements.

9) **Corrective Action Process**

Identified deficiencies in conformities shall be addressed through a documented corrective action process.

10) **Documentation and Records**

Documents and records to ensure regulatory compliance and conformity to company requirements shall be maintained and retained with appropriate confidentiality to protect privacy.