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## Anti-Corruption Policy

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### 1. PURPOSE

At TE Connectivity and its affiliates and subsidiaries worldwide (collectively, the “Company” or “TE”), we compete vigorously to be a global leader. We work hard every day to earn and maintain the trust of our customers, business partners, and stakeholders. To maintain that trust, we must always conduct business in full compliance with the law and our values and uphold the highest standards of business ethics. For these reasons, when interacting with customers, business partners, and other stakeholders, we never offer, promise, provide, or receive anything of value – directly or indirectly through a third-party intermediary – to gain an unfair competitive advantage or to obtain or retain business.

For the purposes of this Policy, “anything of value” is defined very broadly and includes cash, cash equivalents, gifts, hospitality, travel, and lodging (for more information on gifts, hospitality, travel, and lodging see TEC-407-1194). This Policy sets forth the minimum standards that apply everywhere we do business – to help us operate in full compliance with applicable international and/or national anti-corruption laws and regulations, including, but not limited to, the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the U.S. Foreign Extortion Prevention Act.



#### KEY PRINCIPLE

- You must not bribe or accept bribes, and you must not use intermediaries, such as agents, consultants, advisers, distributors or any other business partners, to commit acts of bribery. TE doesn’t distinguish between government officials and private persons/companies for purposes of bribery – bribery is simply prohibited.

### 2. SCOPE

This Policy applies to you – all our employees, officers, and directors – everywhere we do business, as well as business partners acting on behalf of TE.

### 3. APPLICABLE DOCUMENTS

You are expected to read and understand this Policy and other related TE policies. These policies help you make the right decisions as you perform your work for TE.

#### 3.1. Policies, Procedures, and Documents

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|--------------------------------|---|
| • <a href="#">TEC-01-02</a>    | Global Records Management Policy  |
| • <a href="#">TEC-01-23</a>    | Policy Governing Political Activities and Government Engagement           |
| • <a href="#">TEC-01-24</a>    | Policy Avoiding Conflicts of Interest                                     |
| • <a href="#">TEC-01-34</a>    | International Trade – Foreign Government Visitors                         |
| • <a href="#">TEC-03-0501</a>  | Delegation of Authority   |
| • <a href="#">TEC-407-1194</a> | Mandatory Procedures for Exchanging Gifts, Hospitality, Travel or Lodging |
| • <a href="#">TEC-407-1329</a> | Mandatory Procedures for Engaging Business Partners                       |
| • Guide                        | Guide to Ethical Conduct  |



## 4. DEFINITIONS

The following words and terms are important.

**Anything of value** – Anything that has worth or provides value to the recipient. Some examples are: cash, gifts, hospitality, travel, lodging, favors (e.g., a job for a family member), charitable donations, political contributions, commissions, rewards, rebates, discounts, loans, business or investment opportunities, or any other advantage.

**Bribery and Corruption** – Offering, promising, providing, or receiving anything of value in exchange for obtaining or retaining business or securing an improper advantage in either the public or private sectors, including giving in to extortion demands.

**Business partner** – A third party TE does business with, such as a supplier, vendor, consultant, agent, distributor, contractor, or services provider.

**Close relative** – A close relative includes a spouse, spousal equivalent, parent, stepparent, child, stepchild, sibling, stepsibling, nephew, niece, aunt, uncle, grandchild, in-laws, life partners, or adoptive relationships.

**Cash** – Any form of legal currency or cash equivalent (e.g., travelers' checks, gift cards, bearer instruments, cryptocurrencies).

**Employee** – Any person hired by TE to perform a specific job or service for pay.

**Extortion** – A government official or a private individual demanding or seeking anything of value in exchange for taking or omitting to take official action or conferring any improper business-related advantage.



### **EXAMPLES OF EXTORTION**

(1) an employee is approached by a government official who demands a cash payment in exchange for not imposing unnecessary regulatory inspections, (2) a government official threatens to delay the approval of a crucial permit unless the company provides them with expensive gifts, (3) an employee is told by a vendor that our business operations will be disrupted unless the company pays the vendor a fee.

**Gift** – A gift is any item of value that is exchanged in the context of a business relationship. Gifts are typically tangible items, such as logo items, candy, flowers, and nominal business accessories. Some gifts are permitted, while others are not. Hospitality, travel, and lodging (defined separately in this Policy) can also be gifts, if the person providing the hospitality is not present.



**Government official** – Any person – or close relative of a person – with any influence over the functions or funds of a public authority, or those of a candidate or political party. Some examples include:

- Persons elected, appointed, or hired to support a public authority or public international organization
- An officer or employee of a company, business or organization (including a not-for-profit organization) partially or wholly owned or controlled by a government
- An officer or employee of a public international organization (e.g., the World Bank, the United Nations)
- Any individual who is considered a government official under local law or any employee of a foreign government or any department, agency, or instrumentality thereof
- Any individual acting in an unofficial capacity on behalf of foreign governments, exerting influence or carrying out activities that advance governmental interests without holding a formal governmental title



- An individual acting in an 'unofficial capacity' refers to any person who, while not holding a formal governmental or official position, nevertheless exercises significant influence or authority on behalf of or in connection with a foreign government or public international organization. This includes individuals who may be agents, consultants, advisors, or representatives of such governments or organizations, and who have the ability to affect governmental decisions or policies.

**Hospitality, travel, and lodging** – Hospitality, travel, and lodging refers broadly to any event, experience, or entertainment organized for the purposes of enhancing a current or potential business relationship. Examples include meals, social events, sporting events, cultural events, and travel to or from hospitality and lodging events.

## 5. GENERAL RULE

### 5.1. Prohibition of Bribery and Corruption

Except as expressly provided for in this Policy and the Mandatory Procedures for Exchanging Gifts, Hospitality, Travel, and Lodging, you are not permitted to offer, promise, provide, demand, or receive anything of value (directly or through a third-party intermediary), to or from any commercial business partner or government official while conducting business on behalf of TE. Offering, promising, providing, demanding, or receiving anything of value for the purpose of gaining or retaining business or securing an unfair advantage is never allowed.

### 5.2. Prohibition of Giving in to Extortion

It is strictly prohibited to give in to extortion demands made by government officials or private individuals by offering, giving, promising, or authorizing the offering, giving, or promise of anything of value, directly or indirectly to such persons.



### 5.3. Prohibition of Facilitation Payments

Facilitation payments refer to offering, promising, or providing to a government official anything of value in order to secure or expedite the performance of a routine or necessary action that the payer is entitled to. These are also called “speed” or “grease” payments and are made to facilitate non-discretionary actions, such as processing visas, customs clearance and business permits.

You are not permitted to offer, promise, or provide facilitation payments to government officials. The only exception to this prohibition is if you, a colleague, or a family member are in imminent danger or there is a threat to your health. Whenever possible, you should obtain approval from TE’s Chief Compliance Officer before offering, promising, or providing a facilitation payment. In all cases, you are required to report any facilitation payment you make to the Chief Compliance Officer and the General Counsel as soon as practicable after the conditions requiring a facilitation payment have passed. You are required to submit your facilitation payment in the disclosure form:

<https://sso4-prod.te.com/adfs/ls/ldpInitiatedSignon.aspx?LoginToRP=https://te.ospreycompliancesuite.com/coiriskmanager/>

### 5.4. Gifts, Hospitality, Travel, and Lodging

Under this Policy, anything of value includes the exchanging of gifts, hospitality, travel, and lodging – both between commercial business partners and government officials. Certain rules apply to commercial business partners, while other rules apply to government officials -- refer to TEC-407-1194 for detailed rules.

### 5.5. Sponsorship, Political Contributions and Charitable Donations

You may not sponsor or provide political contributions or charitable donations if they are intended to solicit or obtain or retain business or an improper advantage. You may not use Company funds, property, services or anything of value that belongs to TE if a beneficiary of such use is a political party, government official, or a candidate for public office. TE’s Chief Compliance Officer and the Vice President of Global Government Affairs can make exceptions by giving prior written approval. Please use the disclosure form to obtain such approval.

All sponsorships must be supported by appropriate written contracts. TE’s Law Department must review all such contracts.



**NOTE**

- TE or any of its affiliates may release localized policies on these subjects; however, any localized policy on these subjects may not be less strict than this Policy.
- The manager responsible for the sponsorship/donation cost center is responsible for ensuring the above requirements.



## 5.6. Discounts and Rebates

Discounts and rebates on products and services must be market-driven and based on arm's-length commercial terms. Discounts and rebates may never result in an improper benefit, either directly or indirectly, to any business counterparty, government official, or customer. All discounts must be adequately supported by documentation and accurately recorded in reasonable detail in TE's books and records in accordance with applicable finance and accounting policies and procedures.

## 6. ACCURATE BOOKS AND RECORDS

In addition to our prohibition against engaging in any form of bribery and corruption, whether public or private, the other equally important requirement is that you maintain accurate books and records. Failure to maintain accurate books and records exposes the Company and you to risk and liability.

You are expected to create and maintain books and records that accurately and fairly reflect – in reasonable detail and in a timely manner – all transactions and disposition of assets. Such transactions include, but are not limited to:

- Payments to and from business partners or government officials
- Gifts provided to or received from business partners or government officials
- Hospitality, travel, and lodging provided to or received from business partners or government officials

Refer to TEC-407-1194 for more information on recording gifts, hospitality, travel, and lodging.

You are never permitted to falsify documents, books, or records – or to create false, misleading, incomplete, inaccurate, or artificial documents or entries in TE's books, records, or accounts. You are never permitted to create an undisclosed or unrecorded fund, book, ledger, account, or asset for any reason or purpose.



### NOTE

- You are responsible for making sure that any improper payments are completely and accurately recorded in reasonable detail and in accordance with TE's Records Management Policy as soon as practicable.
- You may not participate in creating a false, misleading, incomplete, inaccurate, or artificial entry into TE's books, records, or accounts. "Off-the-books" accounts are strictly prohibited.
- All cash transactions must be individually and accurately recorded.

## 7. COMPLIANCE AND REPORTING

You must immediately report any suspected violations of this Policy, except to the extent that such reporting is explicitly prohibited by law.



### NOTE

- If you are aware of any improper payments made to, or requested by, government officials or made to, received from, or requested by private persons/organizations – even if you did not authorize or make them yourself – you must report them.



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## **8. TRAINING AND CERTIFICATIONS**

Select groups of employees must participate in anti-corruption training on a periodic basis. Each year, TE may ask you to certify that you have been informed of and will comply with the requirements of this Policy. Depending on your job responsibilities, we may also request additional certifications.

## **9. ENGAGING BUSINESS PARTNERS**

You may not engage, retain, or otherwise use any business partner in-scope of TE's Business Partner Management Program without first complying with TE's Mandatory Procedures for Engaging Business Partners (TEC-407-1329). At a minimum, you must make all reasonable efforts to ensure the integrity of a business partner before engaging, retaining, or otherwise using the partner. You may not engage, retain, or otherwise use a business partner if integrity concerns exist and cannot be resolved.

## **10. EXCEPTIONS**

Any exceptions to this Policy must be approved in advance and in writing by either TE's General Counsel or the Chief Compliance Officer. You are responsible for ensuring that the written approval is made a part of the records kept in the ordinary course of the related business.

## **11. RESPONSIBILITY FOR ADMINISTRATION AND IMPLEMENTATION**

You are responsible for making sure that you comply with this Policy. The senior management of each business unit/function is responsible for addressing and resolving all potential bribery and corruption risks related to its operations and for compliance with applicable laws and this Policy.

If you have any questions, please speak with your manager or a member of the Law Department or the Ethics & Compliance team. You may also contact the Office of the Ombudsman, or use the ConcernLINE or ConcernNET to raise a question, concern or report.

## **12. VIOLATIONS**

Violations of this Policy may result in disciplinary action, up to and including termination.