



CONNECTING WITH OUR VALUES

TE Connectivity Guide to Ethical Conduct



A MESSAGE FROM OUR CEO

At TE Connectivity (TE), we believe that it takes more than strong performance to build a great company. It also requires an unwavering commitment to the highest standards of ethics and integrity. As a large multinational public company, and a leader in our industry, that commitment has never been more important than it is today.

All of us at TE must maintain our focus on delivering strong financial performance, growing faster than the market and delivering an extraordinary customer experience to help us achieve our strategic vision. Our company value system is central to that vision, and as a leader in our industry and our communities, we must hold an unwavering commitment to an exemplary code of conduct.

Our Guide to Ethical Conduct outlines how we uphold our four core values – integrity, accountability, teamwork and innovation. These core values should be reflected in the daily decisions we make at every location and level of the organization. Our values, along with our company policies, outline what is expected of each of us so we can consistently do the right thing as representatives of TE.

Our continued success will hinge on the actions you take every day, your good judgment, your transparency and your willingness to speak up. Thanks to you, we have earned a reputation as an ethical company. Our customers and shareholders trust and respect the work we do. Keep up the good work, and every connection we make will be even stronger in the future.

Tom Lynch



TABLE OF CONTENTS

Introductions

Our Guide: Connecting with Our Values..... 6
 Our Responsibilities 8
 Ethical Leadership10

Our Values

We must demand of ourselves and of each other the highest standards of individual and corporate integrity. We safeguard company assets. We comply with all laws and company policies. We are dedicated to diversity, fair treatment, mutual respect and trust.

INTEGRITY

12

Diversity and Equal Opportunity 14
 Fair Competition15
 Anti-bribery and Anti-corruption16
 Working with Governments17
 Preventing Fraud.....18
 Anti-money Laundering19
 Avoiding Insider Trading 20
 Imports and Exports21
 Protecting Company Assets22
 Protecting Intellectual Property23
 Protecting Confidential Information.....24
 Data Privacy25

We foster an environment that encourages innovation, creativity, excellence and results through teamwork. We practice leadership that teaches, inspires and promotes full participation and career development. We encourage open and effective communication and interaction.

TEAMWORK

26

Creating an Extraordinary Customer Experience.....28
 Preventing Harassment.....29
 Preventing Violence, Abusive Behavior and Bullying 30
 A Safe and Healthy Workplace.....31
 A Substance-free TE.....32
 Communicating About TE.....33

ACCOUNTABILITY

34

We honor the commitments we make and take personal responsibility for all actions and results. We create an operating discipline of continuous improvement that is an integral part of our culture.

Avoiding Conflicts of Interest..... 36
 Gifts and Hospitality38
 Accurate Recordkeeping.....39

We recognize that innovation is the foundation of our business. We challenge ourselves to develop new and improved ideas for all that we do. We encourage, expect and value creativity, openness to change and fresh approaches.

INNOVATION

40

Respect for Human Rights 42
 Social Responsibility 43
 Global Corporate Citizenship 44
 Political Activities..... 45
 Social Media 46
 Promoting Creative Thinking
 and Solutions - TEOA Everywhere.....47

Conclusion

Our Resources and Non-Retaliation Policy.....48
 My Commitment Statement.....51





OUR GUIDE: CONNECTING WITH OUR VALUES

OUR GUIDE TO ETHICAL CONDUCT:

- Defines TE's ethical standards of business conduct.
- Provides a framework that ensures we act with the highest standards of integrity in our day-to-day activities.
- Outlines our policies and points to the laws and regulations that affect our worldwide operations.

OUR GUIDE APPLIES TO YOU.

It represents TE's commitment to an honest, ethical workplace and applies to every employee worldwide, as well as to our Board of Directors and officers of TE. Individuals and entities acting for or on behalf of TE, including agency-supplied personnel, agents, representatives, contractors and other third parties, must also comply with the spirit of our Guide. Each of us has a responsibility to read and comply with the Guide and to be familiar with the laws and regulations that govern the work we do.

WE COUNT ON YOUR GOOD JUDGMENT.

Our Guide offers detailed guidance based on our company values but is not a comprehensive listing of all applicable laws, policies, procedures and employment agreements. It simply can't address every situation or challenge we may face on the job, so seek guidance and ask questions when you are uncertain about the right course of action. If you encounter an inconsistency or conflict, contact your supervisor, your local Human Resources representative, the **Law Department**, Internal Audit or the **Office of the Ombudsman**.

WE TAKE VIOLATIONS SERIOUSLY.

Help us to promote a positive work environment and maintain the kind of company that we can all be proud of. Violations of our Guide or other TE policies, practices or regulations can have negative consequences for TE and for you and could potentially lead to disciplinary action, up to and including termination. Not reporting suspected violations also can have negative consequences for you, as well. In some cases, TE may have a legal or ethical obligation to report violations of the Guide to appropriate law enforcement authorities.

OUR RESPONSIBILITIES

AS PART OF THE TE TEAM, EACH OF US HAS A RESPONSIBILITY TO CONDUCT BUSINESS LEGALLY AND ETHICALLY.

DO THE RIGHT THING.

Always remember that you are responsible for your decisions and your actions. No one – at any level of TE – has the authority to direct you to do something illegal or unethical. There are many people in TE who will listen and **HELP** if you have questions.

LEARN MORE.

Complete your mandatory training so that you know and understand our policies and can apply them in your everyday work.

CONFIRM YOUR COMMITMENT.

Sign your annual certification (“My Commitment Statement”) to acknowledge that you have read and understand our Guide and are in full compliance with the policies it outlines.

PRESERVE OUR ETHICAL WORKPLACE.

Be alert to activities around you and speak up if you suspect illegal or unethical conduct by any TE employee, contractor, vendor, supplier, customer or other person working for or on behalf of TE.

SPEAK UP.

If you seek advice, raise a concern, or report suspected acts of misconduct in good faith, you are complying with this Guide and doing the right thing. “Good faith” means that you are making a genuine attempt to provide honest and accurate information, even if you are later proven to be mistaken. Please report any retaliatory act against you for speaking up in accordance with the Guide. Anyone found to have committed a retaliatory act will be subject to disciplinary action, up to and including termination.

COOPERATE WITH INVESTIGATIONS.

TE investigates reports of misconduct, determines whether a violation has occurred and takes appropriate corrective action. It is your responsibility to cooperate fully and honestly in any internal or governmental investigation. All reports are handled promptly and discreetly.

For further guidance, see **TEC-01-57 Reporting and Investigating Misconduct**.

NEVER COMPROMISE ON INTEGRITY.

TE only conducts business through legal and ethical means. The pressure to succeed should not make you compromise our values or do anything you know is wrong. Any time you’re faced with an ethical dilemma, a decision tree may help.

ASK YOURSELF:



Is it legal?



Does it reflect TE values?



Does it comply with our policies?



Would you feel okay if it appeared in the media?

NO

If you answer NO or NOT SURE to any of these questions, stop and seek help.

ETHICAL LEADERSHIP

ETHICAL LEADERSHIP IS CRITICAL FOR PROMOTING AND IMPLEMENTING THIS GUIDE - EVERYONE AT TE CAN MAKE THE DIFFERENCE BY BRINGING OUR VALUES TO LIFE. THE ACTIONS YOU TAKE EVERY DAY AND THE CONTRIBUTIONS YOU MAKE TO AN ETHICAL WORKPLACE SEND A MESSAGE TO EVERYONE AROUND YOU.

INTEGRITY

Lead by example and reinforce ethical behavior. Be transparent and avoid conflicts of interest.

TEAMWORK

Encourage an open dialogue and seek - and accept - input from your *colleagues*. Foster a positive work environment, free from harassment and unfair treatment.

ACCOUNTABILITY

Do what you say, take responsibility. Honor commitments of yourself and others and acknowledge performance.

INNOVATION

Always strive to make things better, share ideas and compliment others for theirs.

KNOW THIS GUIDE.

Make sure you are familiar with our Guide and the laws and policies that apply to your team. Refer, also, to our Managers' Guide - it offers tips, tools and resources to help you lead with integrity and manage your team in a way that supports our Guide.

ADDRESS ISSUES.

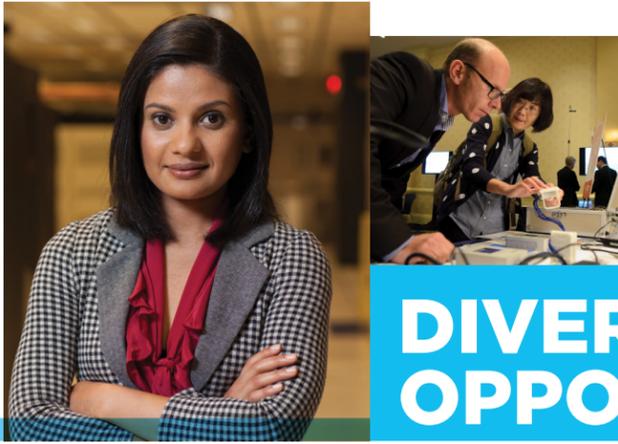
Advise employees of the toll-free *ConcernLINE*, the online *ConcernNET* and other **resources** available to them. Report all unethical issues to the **Human Resources Department**, the **Law Department** or the **Office of the Ombudsman**.

Never investigate matters yourself, hire an outside investigator or respond in a retaliatory manner - or allow retaliation by others.



WE MUST DEMAND OF OURSELVES AND OF EACH OTHER THE HIGHEST STANDARDS OF INDIVIDUAL AND CORPORATE INTEGRITY. WE SAFEGUARD COMPANY ASSETS. WE COMPLY WITH ALL LAWS AND COMPANY POLICIES. WE ARE DEDICATED TO DIVERSITY, FAIR TREATMENT, MUTUAL RESPECT AND TRUST.

INTEGRITY



DIVERSITY AND EQUAL OPPORTUNITY

TE REPRESENTS THE BLENDING OF INDIVIDUALS WITH DIVERSE EXPERIENCES, CULTURES AND BACKGROUNDS. WE APPRECIATE AND CELEBRATE OUR DIVERSITY, AND WE EXTEND UNDERSTANDING, INCLUSION AND CONTINUOUS LEARNING TO EVERYONE ON THE TE TEAM.

COMMIT

Together, we:

- Are committed to equal opportunity and fair treatment for all employees.
- Prohibit discrimination on the basis of an individual's race, color, religion, sex, age, national origin, citizenship status, disability, sexual orientation, veteran status or any other protected status.
- Demonstrate fair treatment in all employment practices, including those related to recruiting, hiring and training; promotions, pay and benefits; and transfers and workforce reductions.
- Base employment decisions on an individual's qualifications and experience as they relate to the job and any applicable union collective bargaining agreements.
- Comply with all applicable civil rights, human rights and labor laws, everywhere we operate.

Any activity that violates individual dignity is prohibited – even if the activity is permissible under applicable law.

CONNECT

I believe I was passed up for a promotion because of my age. What should I do?

TE requires that employment decisions be made without regard to age of the candidate. If you feel you were treated unfairly, contact the Human Resources Department, the Law Department or the Office of the Ombudsman.

LEARN MORE

For further guidance, see [TEC-04-13 Equal Employment Opportunity Policy](#)

FAIR COMPETITION

ANTITRUST AND COMPETITION LAWS ARE DESIGNED TO PROMOTE COMPETITION AND A THRIVING MARKETPLACE, BUT THEY CAN BE COMPLEX AND DIFFER FROM COUNTRY TO COUNTRY. IT'S IMPORTANT TO UNDERSTAND HOW THEY AFFECT OUR DAY-TO-DAY WORK AND TO AVOID CONDUCT THAT MIGHT EVEN SUGGEST A VIOLATION.

COMMIT

Together, we:

- Compete lawfully and ethically around the world.
- Never discuss bids or prices with competitors or agree to divide customers, markets or territories.
- Don't discriminate in the prices or terms and services we offer similarly situated customers.
- Understand that “tying arrangements,” where as a condition of buying one product a customer must buy something else or meet other unreasonable conditions, may be prohibited by competition law.
- Avoid making disrespectful or disparaging comments about our competitors' products or services.

LEARN MORE

For further guidance, see [TEC-01-27 Antitrust Policy](#). Contact the [Law Department](#) for the specific rules that apply to your business.



CONNECT

What is Price Fixing?

It is an illegal business practice where two or more rival companies agree to sell a product or service at a certain price usually to push the price higher. Price fixing is often considered a violation of antitrust laws because it controls supply and demand and prevents prices from fluctuating naturally.



ANTI-BRIBERY AND ANTI-CORRUPTION

OUR ZERO-TOLERANCE APPROACH TO BRIBERY SUPPORTS OUR REPUTATION FOR OPERATING ETHICALLY AND LEGALLY ALL OVER THE WORLD. WE WANT OUR SUCCESS TIED TO OUR PRODUCTS AND SERVICES, NOT TO UNETHICAL OR ILLEGAL BUSINESS PRACTICES.

COMMIT

Together, we:

- Understand that violations of anti-bribery laws can result in lawsuits, substantial fines and jail time and also lead to severe reputational harm for companies and individuals.
- Understand that we are subject to the laws of multiple countries as they relate to bribery and corruption and we must avoid even the appearance of something improper.
- Never offer, promise or give a financial or other benefit to gain an improper advantage.
- Never request, agree to receive or receive any financial or other benefit from someone as an inducement to do something improper.
- Choose carefully when selecting business partners, knowing that TE may be held liable for actions of business partners acting on our behalf.

CONNECT

A local consultant reports that **there are unexpected issues associated with obtaining a license from authorities, but she offers to settle the issue non-bureaucratically for a little upfront payment.**

Is there any problem with this?

Yes, her proposal could indicate an improper payment to a government official.

LEARN MORE

For further guidance, see [TEC-01-25 Anti-Corruption Policy](#)

WORKING WITH GOVERNMENTS

SALES TO CUSTOMERS WHOSE COMPANIES ARE OWNED IN WHOLE OR IN PART BY A GOVERNMENT FOLLOW STRICTER RULES THAN SALES TO COMMERCIAL CUSTOMERS. WE KNOW AND COMPLY WITH APPLICABLE LAWS AND REGULATIONS AND AVOID EVEN THE APPEARANCE OF IMPROPRIETY.

COMMIT

Together, we:

- Are truthful and accurate in all reports, statements, certifications, bids, proposals and claims made to government agencies.
- Ensure that our own records, financial and otherwise, are accurate.
- Make certain that gifts and hospitality provided to government officials are legal, reasonable and comply with our policy and that they are never given to improperly influence an official or business decision.
- Completely and accurately record all payments, gifts and hospitality made to government officials in a timely manner and in reasonable detail as required by TE's **Mandatory Procedures for Extending Gifts, Hospitality, Travel or Lodging.**

Except as expressly outlined in our policy and by local law, direct or indirect payments to government officials, their family members or their intermediaries are strictly prohibited.

CONNECT

What is a Facilitation Payment?

A modest payment made to low-level foreign government employees for taking care of “routine governmental actions” such as processing governmental paperwork, providing police protection or releasing goods held in customs. TE prohibits the payment of “facilitation” or “grease” payments to government officials, except in emergency situations as set forth in TE’s anti-bribery policy.

LEARN MORE

For further guidance, see [TEC-01-25 Anti-Corruption Policy](#)





PREVENTING FRAUD

MISREPRESENTATION, CHEATING, STEALING AND DECEPTION ARE POTENTIALLY ACTS OF FRAUD AND HAVE NO PLACE IN A COMPANY LIKE OURS THAT VALUES INTEGRITY. WE UNDERSTAND THE KINDS OF ACTIONS THAT ARE CONSIDERED FRAUDULENT AND SPEAK UP IF WE SEE OR SUSPECT DISHONESTY.

COMMIT

Together, we:

- Ensure that information on timesheets and expense reports is never misrepresented.
- Don't misuse or abuse company property or equipment.
- Won't tolerate dishonest accounting practices.
- Never steal cash or misappropriate company funds, scrap materials or inventory.

LEARN MORE

For further guidance, see the [Financial Policies & Controls](#) website

CONNECT

While traveling for business, I contacted my brother who lived in the area. We went out to dinner, and my brother suggested that I charge both his meal and mine on my corporate card and expense it. Can I do that?

No. Tell your brother, while you can expense your meal, you cannot expense his meal because it is not a business-related meal. You have a responsibility to be honest and accurate on expense reports. If your brother lets you stay at his home instead of a hotel, this saves the company money, so you may be permitted to thank him by taking him out for a modest meal of no more than 100 USD or local equivalent (regardless of length of stay) and charging it to the company, as long as such activity is consistent with our policy and accurately recorded.



ANTI-MONEY LAUNDERING

WE NEVER ASSOCIATE WITH ANYONE ENGAGED IN CRIMINAL ACTIVITY, INCLUDING MONEY LAUNDERING. MONEY IS "LAUNDERED" WHEN FUNDS FROM CRIMINAL ACTIVITIES (SUCH AS TERRORISM, DRUG DEALING OR FRAUD) ARE PROCESSED THROUGH COMMERCIAL TRANSACTIONS TO CONCEAL THE SOURCE, AVOID REPORTING OR EVADE TAXES.

COMMIT

Together, we:

- Take steps to prevent inadvertent use of TE's business activities for these purposes – we never knowingly facilitate money laundering.
- Conduct business only with reputable customers who conduct legitimate business activities and are funded by legitimate sources.
- Immediately report any unusual or suspicious activities, transactions or recordkeeping.

CONNECT

What can I do to combat money laundering?

Awareness is the key. Watch for any suspicious activities or transactions that are outside the expected "norm" or usual behavior for a customer or vendor. For example it should raise suspicion if payments are requested to be made to a different location than where the services were provided or large cash payments are offered.



AVOIDING INSIDER TRADING

OUR WORK AT TE MAY EXPOSE US TO MATERIAL, NON-PUBLIC - OR INSIDE - INFORMATION ABOUT OUR COMPANY OR COMPANIES WITH WHICH WE DO BUSINESS (SUCH AS TE CUSTOMERS, SUPPLIERS, VENDORS, SUBCONTRACTORS AND BUSINESS PARTNERS). WE DON'T TRADE - OR TIP OTHERS TO DO SO - BASED ON INSIDE INFORMATION.

COMMIT

Together, we:

- Understand that inside information can include things like...
 - Unpublished information about new products or services
 - Proposed mergers, divestitures and acquisitions
 - Financial information such as projections of future earnings or losses
 - The gain or loss of a major customer or supplier
- Never trade - or allow family members or anyone with whom we have a significant personal relationship to trade - on TE securities (including stocks, stock-based securities and bonds) or the securities of any publicly held company based on inside information.
- Don't "tip" others to trade - we avoid even the appearance of an improper transaction.

LEARN MORE

For further guidance and to understand the special requirements applicable to TE directors and many senior level employees, see [TEC-01-33 Insider Trading and Communications with the Public](#)

CONNECT



A coworker learned some confidential information about one of TE's suppliers and gave me a stock tip. Is it okay to buy some shares of stock in their company?

No, the information you received was material, non-public information and you should not use it to trade in that company's securities. When your coworker passed along a "tip," he or she may have been committing a form of insider trading.

IMPORTS AND EXPORTS

IMPORT/EXPORT LAWS REGULATE WHERE WE MAY SHIP OUR PRODUCTS, SHARE OUR TECHNOLOGIES AND CONDUCT BUSINESS. WE COMPLY WITH ALL APPLICABLE LAWS, REGULATIONS AND RESTRICTIONS WHEREVER WE OPERATE IN THE WORLD.

COMMIT

Together, we:

- Understand that countries may place controls on products and technologies developed or manufactured locally regardless of where the items are distributed or sold.
- Recognize that, for some transactions, trade compliance laws from more than one country may apply.
- Also recognize that many countries place additional restrictions on items and related technical data that are designed, modified, created or adapted for military, defense or space use.

LEARN MORE

For further guidance, see:

- [TEC-01-31 International Trade Policy](#)
- [TEC-01-43 Non-SAP Locations Denied Party List Screening Policy](#)
- [TEC-01-44 Anti-boycott Policy](#)
- [TEC-01-48 International Trade - Global Customs Brokers Policy](#)
- [TEC-01-49 International Trade - Country of Origin Policy](#)
- [TEC-01-02 Global Records Management Policy](#)

Contact the [Law Department](#) with any questions or concerns.

CONNECT



I overheard some engineers discuss an upcoming technical/sales proposal with foreign customers. I suspect the products and technical data may be export-controlled and mentioned to my boss that a disclosure to the customer could be an export violation. He told me that the competitor will win the business if we don't meet the submission deadline. What should I do?

If you suspect that there's a violation you have an obligation to share your concerns up the line. Seek guidance from the [Law Department](#).



PROTECTING COMPANY ASSETS

COMPANY ASSETS ARE FOR COMPANY BUSINESS AND MUST BE PROTECTED FROM LOSS, DAMAGE, WASTE AND MISUSE. OUR ASSETS INCLUDE FINANCIAL ASSETS SUCH AS CASH, BANK ACCOUNTS AND CREDIT STANDING; PHYSICAL ASSETS INCLUDING OUR FACILITIES, EQUIPMENT, INVENTORY AND VEHICLES; AND TECHNOLOGY OWNED OR LEASED BY TE SUCH AS COMPUTERS, LAPTOPS, SMARTPHONES, SOFTWARE, INFORMATION SYSTEMS AND ANY EQUIPMENT WITH A BUILT-IN HARD DISK STORAGE CAPACITY.

COMMIT

Together, we:

- Take care of TE assets as we would with our own.
- Physically secure information and hardware against loss, theft, unauthorized access or damage.
- Protect our information systems – we don't download, copy or share software unless it has been approved by TE, we don't access TE's network via unauthorized applications or devices, and we don't use TE assets to test the TE network or application security controls.
- Understand that we may utilize TE equipment and communications for our personal use as long as:
 - Our use is occasional and limited.
 - It doesn't interfere with our work or the work of others.
 - It doesn't result in any incremental cost to TE.
 - We don't improperly disclose confidential or proprietary information.
 - We don't use it to advance personal, non-business interests.
 - It complies with the law and our policies.
- Recognize that all communications sent or received on TE equipment (including email, instant messaging, text messaging, voicemail, conference equipment, company cell phones and handheld devices) are company assets, and TE has the right to monitor them, unless prohibited by local laws.

CONNECT

I've noticed a coworker who repeatedly takes office supplies home. When I asked him about it, he said, "It's no big deal – the company will never miss it." What should I do?

Speak up and report acts of theft or other conduct that violates our Guide.

LEARN MORE

For further guidance, see [TEC-01-30 Use of Company Property Policy](#) and [TEC-01-38 Electronic Communications Policy](#)



PROTECTING INTELLECTUAL PROPERTY

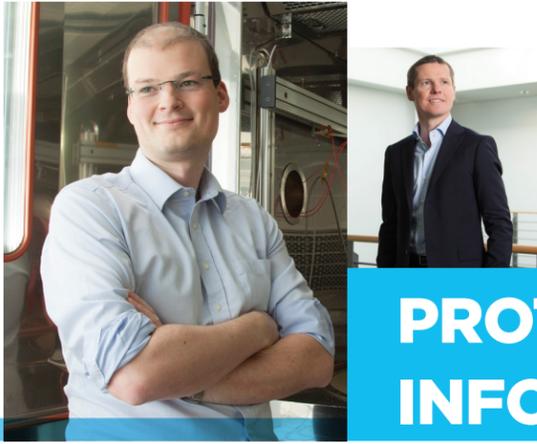
WE RECOGNIZE THAT INNOVATION IS NOT RESTRICTED TO ENGINEERING. TE EMPOWERS ALL OF US TO THINK CREATIVELY ABOUT HOW TO USE OUR PHYSICAL AND INTELLECTUAL RESOURCES TO DELIVER THE LATEST INNOVATIONS FOR OUR COMPANY.

THROUGH INNOVATION, WE ACT FASTER, BETTER AND SMARTER TO PROVIDE TE A COMPETITIVE ADVANTAGE.

COMMIT

Together, we:

- Understand that innovations, discoveries, system designs, writings or enhancements that we develop or design as part of our employment at TE, whether technical or not, are the sole property of TE.
- Disclose such discoveries and innovations to TE.
- Know that the Law Department may pursue intellectual property rights, such as patents, or may decide to keep the innovation as a trade secret.
- Treat improvements to existing processes, procedures, products and activities as confidential information.
- Respect the intellectual property rights of others. We take reasonable precautions not to infringe on valid patents, trademarks and other intellectual property rights.
- Take actions to secure confidential business information belonging to TE and our business partners.
- Contact the **Law Department** immediately if we suspect an issue or are advised of one.



PROTECTING CONFIDENTIAL INFORMATION

WE PROTECT OUR KNOWLEDGE BASE. TE BUSINESS AND TECHNICAL INFORMATION THAT IS NOT GENERALLY KNOWN BY OTHERS IS VALUABLE AND GIVES US A COMPETITIVE ADVANTAGE THAT WE MUST PRESERVE.

COMMIT

Together, we:

- Keep confidential TE information to ourselves.
- Never share such information with anyone – even coworkers – unless it’s part of their job.
- Safeguard confidential information about our customers and other companies with which we do business.
- Protect confidential and proprietary information even if we stop working at TE.
- Never share confidential information with a new employer or with anyone else.

CONNECT

What are some examples of confidential information?

Examples include things like agreements between TE and agents, strategic partners or other third parties; trade secrets, inventions and unfiled patent applications; TE financial information; drawings for potential new products; customer lists and agreements; and customer information entrusted to TE. These are only examples – if you’re not sure if information is confidential, ask.

LEARN MORE

For further guidance, see [TEC-01-24 Policy Avoiding Conflicts of Interest](#)



DATA PRIVACY

WE RESPECT AND PROTECT THE PERSONAL INFORMATION OF OUR EMPLOYEES, CUSTOMERS AND OTHER THIRD PARTIES WITH WHOM WE DO BUSINESS AND ARE COMMITTED TO THE RESPONSIBLE COLLECTION, STORAGE, USE, TRANSFER AND DISPOSAL OF THAT INFORMATION.

COMMIT

Together, we:

- Safeguard the personal information that is entrusted to us and use it only for legitimate business or legal purposes.
- Understand that the term “sensitive personal data” has a specific meaning in certain countries and may be subject to additional safeguards related to collection and use.
- Restrict access to personal information only to those (inside or outside of TE) who have appropriate authorization and valid business reasons.
- Limit the amount of information we share to what is required to accomplish the task.
- Take appropriate measures to protect personal information from unauthorized disclosure and take swift and deliberate action to remedy any breach of data privacy.

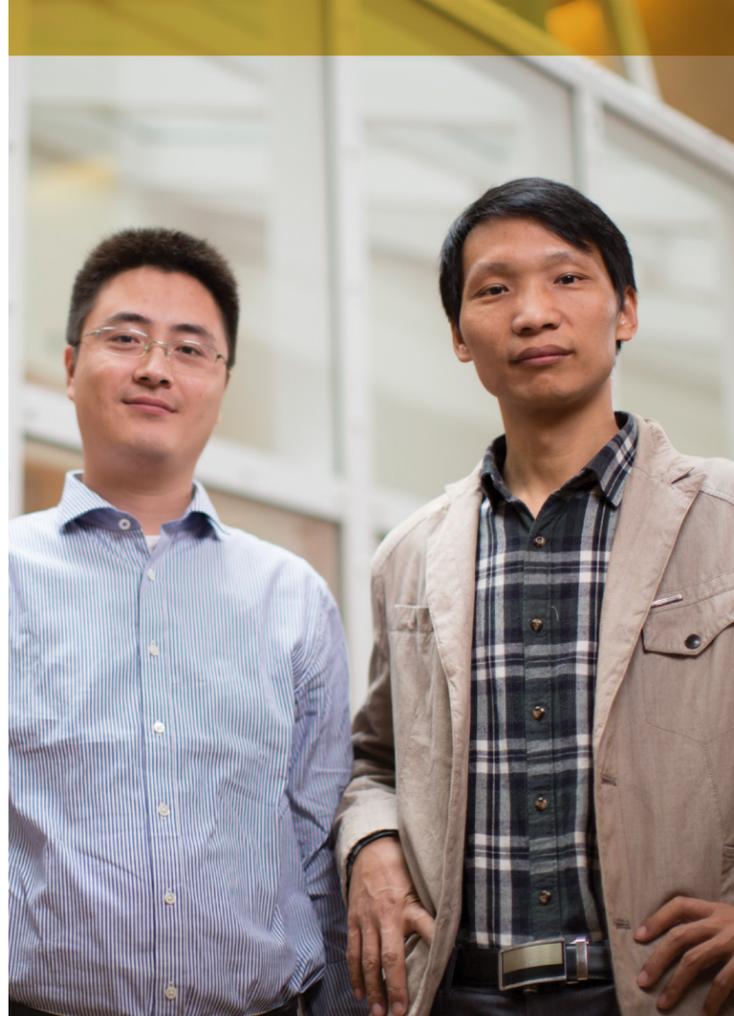
CONNECT

What kind of information is considered personal information?

Personal information is data that can be used to identify a specific person such as a name, address, photo, birth date, phone number, driver’s license number, credit card number or email address. Some countries have an even wider definition of “personal information”.

LEARN MORE

For further guidance, see [TEC-01-53 Global Privacy Principles Protecting Private Data website](#)



WE FOSTER AN ENVIRONMENT THAT ENCOURAGES INNOVATION, CREATIVITY, EXCELLENCE AND RESULTS THROUGH TEAMWORK. WE PRACTICE LEADERSHIP THAT TEACHES, INSPIRES AND PROMOTES FULL PARTICIPATION AND CAREER DEVELOPMENT. WE ENCOURAGE OPEN AND EFFECTIVE COMMUNICATION AND INTERACTION.

TEAMWORK



CREATING AN EXTRAORDINARY CUSTOMER EXPERIENCE (ECE)

EACH OF US PLAYS A CRITICAL ROLE IN PROVIDING WORLD-CLASS CUSTOMER EXPERIENCES. WE WORK AS A TEAM TO OBSERVE THE FOUR PILLARS AND THE ECE PLEDGE POINTS IN ORDER TO NOT ONLY DELIVER SOLUTIONS, BUT TO EXCEED CUSTOMER EXPECTATIONS, EVERY TIME.

COMMIT

Together, we:

- Reflect a positive attitude and embrace the kind of culture where people are empowered to do what's right for our customers.
- Recognize individuals who exhibit ECE behaviors.

4 PILLARS OF AN EXTRAORDINARY CUSTOMER EXPERIENCE

INNOVATION

QUALITY

DELIVERY

SERVICE & SUPPORT

CONNECT

We recently ordered some components that are inferior to the ones we usually use but they are much cheaper. This could save us a lot of money over time. Isn't that best for us?

The quality of our products is one of the most widely recognized benefits of buying from TE. Why would we compromise our reputation and potentially end up spending more on warranty claims? Exchange the items for ones that meet our standards or switch to a more reputable supplier.

CONNECT

We are working on a small job for a new customer who asked us to make some last-minute changes to the project. Should we tell the customer that we cannot meet the deadline because larger projects take priority?

Absolutely not. No one wants to hear they're less important but our customers typically understand that we have conflicts of time and resources. Engage your team to work out a reasonable timeline to meet the customer's needs.

PREVENTING HARASSMENT

TEAMWORK STARTS WITH RESPECT. WE DON'T TOLERATE HARASSMENT IN EITHER WORK-RELATED SETTINGS OR WORK-SPONSORED ACTIVITIES. WE TREAT EACH OTHER WITH DIGNITY AND SPEAK UP ABOUT ANY BEHAVIOR THAT CREATES AN INTIMIDATING, HOSTILE OR OFFENSIVE WORKPLACE.

COMMIT

Together, we:

- Do our jobs in a work environment free from harassment and other inappropriate behavior.
- Do not tolerate:
 - Any unwelcome physical, verbal or visual conduct based on a person's protected status (race, color, religion, sex, age, national origin, citizenship status, disability, sexual orientation, veteran status or any other legally protected status).
 - Unwelcome sexual advances, requests for sexual favors and other physical, verbal or visual conduct of a sexual nature when submission to the conduct is an explicit or implicit term or condition of employment or unreasonably interferes with an individual's work performance by creating a hostile, offensive or intimidating work environment.

Our harassment-free workplace policy extends to our business associates, such as customers, suppliers, vendors, subcontractors, business partners, agency-supplied personnel, professionals, visitors and others with whom we do business worldwide.

CONNECT

One of the guys in marketing has a habit of sending pornographic jokes by email to everyone in the office. Some people think they're funny, but I find them offensive.

Offensive jokes sent through company email have no place in a workplace that values dignity and respect for every employee. Respond directly to the coworker, letting him know that you found the email offensive and asking him to stop sending out emails like these to you. Also let him know that you will report the matter if it continues. If you feel uncomfortable confronting the coworker directly, you may contact another TE resource, such as your [Human Resources](#) representative, the [Law Department](#) or the [Office of the Ombudsman](#).

LEARN MORE

For further guidance, see [TEC-04-07 Harassment-Free Workplace Policy](#)



PREVENTING VIOLENCE, ABUSIVE BEHAVIOR AND BULLYING

A WORKPLACE FREE OF VIOLENCE, ABUSIVE BEHAVIOR AND BULLYING KEEPS US SAFE AND ABLE TO CONCENTRATE FULLY ON OUR JOBS. WE ARE COMMITTED TO A NON-VIOLENT WORKING ENVIRONMENT, FREE OF THREATS, INTIMIDATION AND PHYSICAL HARM.

COMMIT

Together, we:

- Resolve disagreements calmly to preserve the safety and security of coworkers and customers.
- Never bully, threaten, intimidate or harm another person through either verbal behavior (written or oral) or non-verbal behavior (such as gestures, expressions or property damage).
- Never bring weapons or other dangerous devices on TE property, including TE-controlled parking lots and company-owned vehicles, or on our customers' property.
- Report acts or threats of violence directed toward another person or TE property.

CONNECT

I overheard a coworker threaten another employee. I'm not sure if the threatened employee reported the incident.

What should I do?

You have a responsibility to act if you see, hear or suspect a threat of violence in the workplace. Report the incident immediately.

LEARN MORE

For further guidance, see [TEC-04-15 Violence-Free Workplace Policy](#)

A SAFE AND HEALTHY WORKPLACE

WE NOT ONLY WORK TO MEET ALL APPLICABLE LAWS, REGULATIONS AND RECORD-KEEPING REQUIREMENTS, WE STRIVE TO EXCEED THEM BECAUSE SAFETY IS ONE OF THE MOST IMPORTANT BENEFITS WE ALL ENJOY. OUR GOAL IS TO BE AN INDUSTRY LEADER IN SAFETY BY KEEPING EVERYONE INJURY-FREE AT ALL LOCATIONS.

COMMIT

Together, we:

- Comply with all workplace safety rules.
- Observe safe practices when operating machinery and equipment.
- Obey posted warning signs and restrictions.
- Wear TE-approved personal protective equipment when required.
- Immediately report any safety-related issues (including accidents, injuries and near-hits) to your supervisor, safety coordinator or local management.

CONNECT

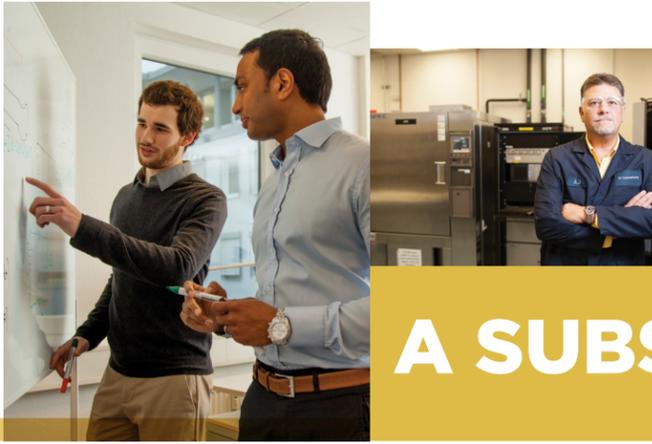
I recently noticed that a conveyor wasn't operating properly. I haven't been trained on the maintenance of this piece of equipment, but it looks like an easy problem to fix. Should I attempt to repair it in order to prevent an injury?

No, you should halt operation of the equipment, contact your supervisor and report the problem immediately.

LEARN MORE

For further guidance, see [The Environmental, Health and Safety website](#)





A SUBSTANCE-FREE TE

SUBSTANCE ABUSE NEGATIVELY AFFECTS JOB PERFORMANCE, CREATES SAFETY HAZARDS AND PUTS EVERYONE AT RISK. THAT'S WHY WE KNOW AND COMPLY WITH TE'S POLICIES, REGARDLESS OF THE JOB WE DO OR WHERE IN THE WORLD WE DO IT.

COMMIT

Together, we:

- Are never under the influence of alcohol, illegal drugs or any other controlled substance on the job.
- Understand that use or possession of illegal drugs and other controlled substances is prohibited at work. Prescription medications prescribed by a doctor are permitted as long as they're used in the manner prescribed and don't affect our safety or job performance.
- Understand that use or possession of alcohol is prohibited unless approved by the highest-ranking management employee and the Human Resources manager at the location. Where serving of alcoholic beverages is approved, we comply with liquor laws and use good judgment to ensure there is no excessive drinking or intoxication.
- Don't smoke (e.g., cigarettes, electronic cigarettes, cigars or pipes) except in areas designated by TE.

Our substance-free workplace policy applies to TE employees, agency-supplied personnel, vendors, customers and visitors at all TE locations.

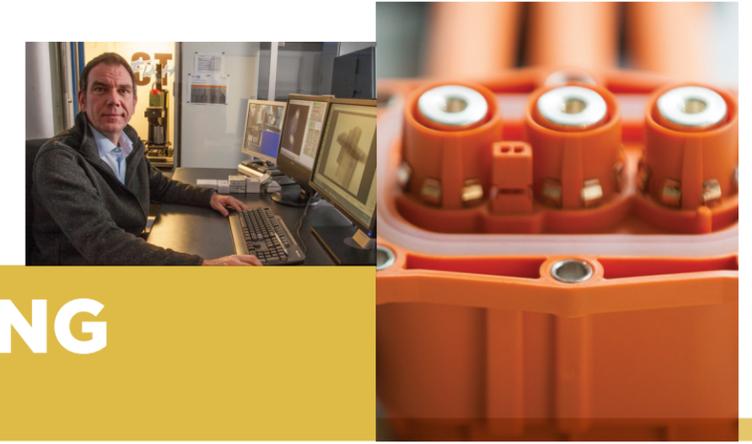
CONNECT

I think I may need help with a drug or alcohol problem. What should I do?

Contact your local Human Resources representative, manager or local employee assistance program, where available.

LEARN MORE

For further guidance, see [TEC-04-09 Drug/Alcohol-Free Workplace Policy](#)



COMMUNICATING ABOUT TE

OUR REPUTATION AND OUR BRANDS ARE VALUABLE ASSETS. WE THINK BEFORE WE SPEAK ON BEHALF OF OUR COMPANY AND ALWAYS DIRECT MEDIA REQUESTS ABOUT TE BUSINESS TO THOSE WHO ARE AUTHORIZED TO RESPOND.

COMMIT

Together, we:

- Reach out to media@te.com for direction if we are contacted by the media regarding TE's business (for a comment, to set up an interview, etc.).
- Route back requests in the BU category to the appropriate BU marketing/product lead. Corporate will handle all other requests.
- Follow regulatory and legal obligations regarding when and how to share news and events about our company with the public.

LEARN MORE

For further guidance, see: [TEC-01-33 Insider Trading and Communications with the Public Policy](#)
[TE Connectivity Brand, Social Media and Public Relations Guidelines](#)

CONNECT

I recently received a phone call from a reporter who asked, "Is it true that TE is about to sell off a division?" I knew the answer to her question – would it have been okay to respond off the record?

No. Regardless of whether you know the answer to the question, all media inquiries should be directed to the team that is authorized to respond. In addition to confirmation or denial about rumors, the media may request information about our financial performance, our policy on legislative issues, changes to our staff, our position on industry or market conditions, new products, processes or strategies – in every case, we have a responsibility to forward the person's name and affiliation, if possible, to the Corporate Marketing & Communications Office for an appropriate response.



WE HONOR THE COMMITMENTS WE MAKE
AND TAKE PERSONAL RESPONSIBILITY
FOR ALL ACTIONS AND RESULTS.
WE CREATE AN OPERATING DISCIPLINE
OF CONTINUOUS IMPROVEMENT THAT
IS AN INTEGRAL PART OF OUR CULTURE.

ACCOUNTABILITY



AVOIDING CONFLICTS OF INTEREST

WE RECOGNIZE HOW IMPORTANT IT IS THAT DECISIONS WE MAKE ON THE JOB ARE OBJECTIVE ONES. WE AVOID ANY SITUATION THAT MIGHT CREATE A CONFLICT OF INTEREST FOR OURSELVES OR FOR TE.

COMMIT

Together, we:

- Protect TE's reputation for fairness as we conduct business.
- Are alert to – and avoid – situations that can pose potential conflicts.
 - Outside employment
 - Personal relationships
 - Personal investments
 - Gifts and hospitality
 - Money loans and other favors
- Disclose potential conflicts of interest through our [disclosure tool](#) in accordance with our [Conflict of Interest Policy](#).

CONNECT



What is a “close relative”?

Close relatives include spouses, parents, godparents, stepparents, children, stepchildren, siblings, stepsiblings, nephews, nieces, aunts, uncles, grandparents, grandchildren, in-laws or life partners.

LEARN MORE

For further guidance, see:
[TEC-04-12 Employment of Relatives Policy](#)
[TEC-01-24 Policy Avoiding Conflicts of Interest](#)

DISCLOSURE PROCESS



DISCLOSURE OF POTENTIAL CONFLICT BY EMPLOYEE

- Employee uses the Online Disclosure Tool posted on TE's Intranet.

DISCLOSURE ROUTED TO RELEVANT REVIEWERS

- Most cases will be approved by direct manager and local HR business partner.
- Where Board memberships in other companies are disclosed, the approval process includes other stakeholders.



REVIEWER APPROVES/ DISAPPROVES OR CONFIRMS LACK OF ACTUAL CONFLICT

- Reviewer determines whether an actual conflict with TE's interests exists.
- Mitigation measures are discussed.
- Reviewers confer with Compliance Counsel where in doubt.



DECISION IS DOCUMENTED IN CORPORATE DATA BASE





GIFTS AND HOSPITALITY

WE UNDERSTAND AND COMPLY WITH THE RULES ABOUT GIFTS AND HOSPITALITY. THE OCCASIONAL EXCHANGE OF GIFTS MAY BE CONSIDERED AN ACCEPTABLE BUSINESS PRACTICE IN CERTAIN CULTURES, BUT IT CAN BECOME UNACCEPTABLE IF IT IS CONSIDERED LAVISH, COMPROMISES OUR PROFESSIONAL JUDGMENT OR SUGGESTS FAVORABLE OR PREFERENTIAL TREATMENT.

COMMIT

Together, we:

- Recognize that an acceptable gift is one that is infrequent, non-cash and nominal in value.
- Comply with the law and policies of both the giver's and the receiver's company.
- Do not offer something that could influence – or appear to influence – a person's independent judgment.

Extending hospitality to and from people who do business with TE is generally permitted as long as it meets the requirements above and is modest, appropriate and in TE's best interest.

CONNECT

What is Hospitality?

Hospitality includes entertainment, meals and social events such as sporting events, parties, golf outings, plays, concerts, receptions, etc.

LEARN MORE

For further guidance, see [TEC-01-24 Policy Avoiding Conflicts of Interest](#)



ACCURATE RECORDKEEPING

ACCURATE ACCOUNTING, FINANCIAL AND BUSINESS RECORDS FULFILL OUR OBLIGATIONS TO SHAREHOLDERS, GOVERNMENTS AND THE PUBLIC. WE ARE RESPONSIBLE FOR RETAINING AND PROTECTING TE RECORDS IN ACCORDANCE WITH APPLICABLE LAW AND TE POLICIES.

COMMIT

Together, we:

- Ensure all business transactions are properly authorized and recorded in TE's books and records in a manner that's timely and accurate.
- Follow U.S. generally accepted accounting principles (GAAP) and accounting principles mandated by local law.
- Adhere to TE financial policies and internal controls.
- Report false entries, suspected mishandling of accounting or recording practices or misuse of our funds or property – or that of our customers – to the **Law Department** or the **Office of the Ombudsman**.
- Store company records and non-record general business information in approved electronic or physical storage locations.
- Comply with TE's record management policies. We securely dispose of all confidential records and general business information, retain all information that may relate to a legal matter or audit, abide by any preservation directive ("Legal Hold") and follow our records retention schedule.

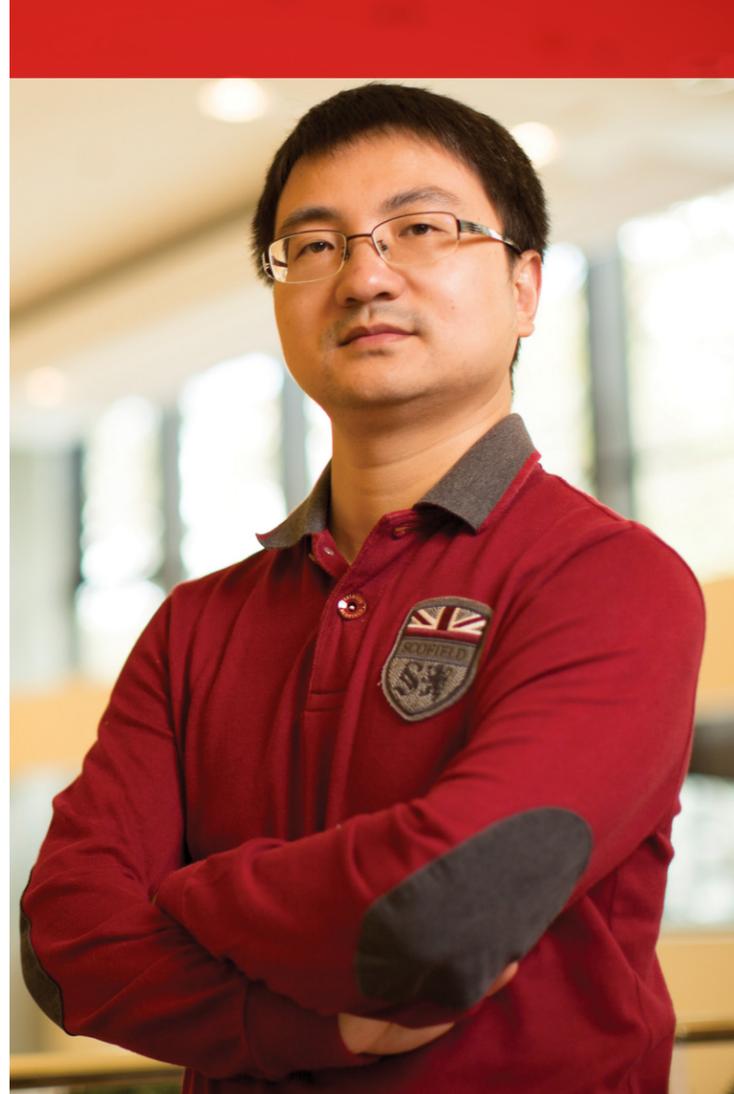
CONNECT

What is a Legal Hold?

A notice to suspend the routine destruction of records which generally includes special recordkeeping instructions, requests for documents and audits. We comply with all legal holds and special recordkeeping requirements. This includes responding promptly to requests for documents or other material from – or on behalf of – TE's auditors, **Human Resources**, the **Law Department** or management. Failure to do so may subject you to disciplinary and/or legal action.

LEARN MORE

For further guidance, see [TEC-01-02 Global Records Management Policy](#)



WE RECOGNIZE THAT INNOVATION IS THE FOUNDATION OF OUR BUSINESS. WE CHALLENGE OURSELVES TO DEVELOP NEW AND IMPROVED IDEAS FOR ALL THAT WE DO. WE ENCOURAGE, EXPECT AND VALUE CREATIVITY, OPENNESS TO CHANGE AND FRESH APPROACHES.

INNOVATION



RESPECT FOR HUMAN RIGHTS

WE ARE GOOD CORPORATE CITIZENS, WHO VALUE OUR PLACE IN THE GLOBAL COMMUNITY AND RESPECT ALL APPLICABLE CIVIL RIGHTS, HUMAN RIGHTS AND LABOR LAWS IN THE LOCATIONS WHERE WE OPERATE. WE REQUIRE THAT OUR SUPPLIERS DO THE SAME.

COMMIT

Together, we:

- Are committed to human rights for all people, everywhere in the world.
- Prohibit all forms of forced labor, the hiring of under-age individuals and the hiring of individuals under the age of 18 for positions where hazardous work is required.
- Prohibit any form of physical punishment or abuse.

CONNECT

My line manager was unhappy with the performance of our shift and told us to stop taking so many water breaks. What should I do?

Speak up and report the situation. Denial of water is an inhumane practice that could have unhealthy, dangerous effects.

SOCIAL RESPONSIBILITY

WE CONDUCT BUSINESS WITH SUPPLIERS WHO SHARE OUR COMMITMENT TO HIGH ETHICAL STANDARDS AND OPERATE IN A RESPONSIBLE AND ETHICAL MANNER.

COMMIT

Together, we:

- Are socially responsible in the communities where we live and work – all across the globe. We believe that building a great company requires a deep understanding of the needs of our customers, and our markets and a commitment to social responsibility.
- Communicate with suppliers regarding a shared commitment to TE's core values as well as the set of core values of the United Nations Global Compact and the spirit of the Electronics Industry Citizenship Coalition (EICC).
- Require suppliers to comply with our [Guide to Supplier Social Responsibility](#).

CONNECT

One of my coworkers is responsible for choosing a supplier to work at one of our locations. He told me that the company he plans to hire has quoted a very low price for the work. I know this company and the reputation it has for questionable labor practices. I know I'm not in charge of the decision, but I feel I should say something – should I?

Yes. You have a responsibility to preserve the reputation we've earned for operating ethically and in compliance with all applicable laws in the locations where we operate. Share your concerns with your coworker so that he may make an informed decision.





GLOBAL CORPORATE CITIZENSHIP

WE VALUE OUR PLACE IN THE GLOBAL COMMUNITY AND SEEK SOLUTIONS THAT IMPROVE PERFORMANCE AND REDUCE THE ENVIRONMENTAL IMPACT OF OUR OPERATIONS.

COMMIT

Together, we:

- Work to reduce the environmental impact of our operations and build stronger relationships in the communities where we operate.
- Comply with all applicable environmental laws and regulations and with the terms of environmental permits and authorizations.
- Do not allow unlawful or unpermitted discharges of waste, hazardous substances, wastewater or air emissions.
- Immediately report any actual or potential environmental hazard to a supervisor, safety coordinator or local management.

CONNECT

I have seen some activities in the office that may be creating an environmental hazard, but I don't want to get involved. Is that okay?

No. As a TE employee, you have a responsibility to take action when you become aware of potential violations of our Guide – this includes reporting environmental hazards or any other unsafe working conditions.

LEARN MORE

For further guidance, see [Corporate Social Responsibility website](#)



POLITICAL ACTIVITIES

WE RESPECT EACH OTHER'S RIGHTS AS CITIZENS AND ENCOURAGE OUR EMPLOYEES AROUND THE WORLD TO BE THOUGHTFUL AND INFORMED VOTERS.

COMMIT

Together, we:

- Involve ourselves in the political process only using our own money and personal time.
- Respect everyone's right to their own political views.
 - Follow all applicable laws relating to political participation and contributions.
 - Coordinate all lobbying activities or any contacts with government officials on behalf of TE, other than sales activities, with the Global Government Affairs Office.
- Never make any political contribution on behalf of TE or use TE's name, funds, property, premises, equipment or services to support a political party, initiatives, committees or candidates without the approval of the Global Government Affairs Office.
- Do not pressure or solicit fellow employees, vendors or customers to make political contributions or participate in support of a political party or candidate.
- Understand that, in the U.S., an authorized political action committee within TE is allowed, by law, to solicit voluntary contributions from TE employees and make political contributions on their behalf in support of TE businesses.

CONNECT

A friend of mine is running for political office and I would like to help her out with her campaign. Is there a problem with this?

No. Your personal support is your personal business. Just make sure you do not use company assets – including company time or the company name – to advance the campaign.

LEARN MORE

For further guidance, see [TEC-01-23 Policy Governing Political Activities](#)



SOCIAL MEDIA

WE USE SOCIAL MEDIA RESPONSIBLY, RECOGNIZING THAT IT OFFERS AN OPPORTUNITY FOR TE TO GROW OUR BUSINESS, ENHANCE OUR CUSTOMERS' EXPERIENCES AND BUILD STRONGER INTERNAL AND EXTERNAL RELATIONS WITH CUSTOMERS, PARTNERS AND SUPPLIERS.

COMMIT

Together, we:

- Use social media in compliance with our values, this Guide and TE's policies and guidelines.
- Adhere to our policies in order to avoid harassment, maintain privacy and protect our company's assets and confidential information.
- Follow laws and policies that apply to our everyday activities when using social media.

CONNECT



I have a blog where I talk about my life and my work. Should I be concerned about what I say about my job?

Yes. If you are blogging about your job, obtain advance approval and make it clear that you are not speaking on behalf of TE. At all times you must protect proprietary information about TE and confidential information about our customers and other companies with which we do business. You are personally responsible for the content you publish online – don't assume your posts are private.

LEARN MORE

For further guidance, see [Guidelines for Participation in Social Media](#)

PROMOTING CREATIVE THINKING AND SOLUTIONS – TEOA EVERYWHERE

WE TAKE A SYSTEMATIC APPROACH TO CONTINUOUS IMPROVEMENT THAT IS ROOTED IN LEAN PRINCIPLES AND TIED TO THE STRATEGY OF OUR BUSINESS. THE TE OPERATING ADVANTAGE (TEOA) IS A PHILOSOPHY, A SET OF VALUES AND A SERIES OF MANAGEMENT PROCESSES THAT COLLECTIVELY DEFINE WHO WE ARE AND HOW WE DO THINGS.

COMMIT

Together, we:

- Build our plans around the customer.
- Link our plans to execution.
- Use a common, proven set of tools for process improvement.
- Manage our processes.
- Build workforce skills and develop the potential of people.
- Manage the end-to-end process across all functions in the value stream.

CONNECT



Who needs to know about TEOA?

TEOA touches all aspects of our company, and the concepts and principles can be applied to any function – all employees should be familiar with TEOA. You can find more information on the TEOA Academy learning portal. There are also TEOA Boot Camp training sessions that are held for employees at all levels of the company.



OUR RESOURCES AND NON-RETALIATION POLICY

IF YOU HAVE A QUESTION, OR NEED TO REPORT A POSSIBLE VIOLATION OF OUR GUIDE, TALK WITH YOUR SUPERVISOR OR ANY OF THE RESOURCES LISTED ON THIS PAGE. REMEMBER, GENERALLY THE BEST RESOURCE FOR WHAT'S RIGHT OR WRONG IS YOUR OWN CONSCIENCE.

Retaliation Will Not Be Tolerated

An employee who, in good faith, seeks advice, raises a concern or reports misconduct is following our Guide – and doing the right thing. We take claims of retaliation seriously. Allegations of retaliation will be investigated, and any retaliatory acts against individuals who report suspected misconduct will be subject to disciplinary action, up to and including termination. If you or someone you know is the victim of retaliation, report it immediately.

LEARN MORE

For further guidance, see

[TEC-01-57 Reporting and Investigating Misconduct](#)

RESOURCE:	CONTACT ABOUT:	TO ACCESS:
Your supervisor or manager	Any issue, question or concern	
Your Local Human Resources representative or TE Human Resources	Any HR-related ethical issues, questions or concerns	HR Web page
TE Law Department	Questions concerning laws, TE policies and acceptable business practices	Law Department Web page
Office of the Ombudsman (an independent, impartial and confidential resource for employees, suppliers, investors or customers)	Violations of laws, policies, rules, regulations or our Guide	U.S., U.S. Territories and Canada: 1-888-662-8374. Email: directors@te.com China: Direct dial, one-step dialing on our Global Inbound Service Line: 4008833425 Austria, Belgium, France, Portugal, Sweden: Email: eudirectors@te.com Worldwide: Follow dialing instructions at AT&T Direct , then dial: 888-662-8374
TE's ConcernLINE (Toll-free, 24/7/365 hotline, operated by an independent reporting service)	Any potential violations of laws, policies, rules, regulations or our Guide	Dialing instructions and mailing address
TE's ConcernNET (24/7/365 confidential website operated by an independent reporting service)	Any potential violations of laws, policies, rules, regulations or our Guide	ConcernNET
Audit Committee of the Board of Directors	Waivers of the Guide to Ethical Conduct	directors@te.com / eudirectors@te.com Austria, Belgium, France, Portugal: Email: eudirectors@te.com
International Trade Compliance Officer	Import/Export, Trade transactions and related party transactions	Trade Compliance Web page
Corporate Communications Office	Questions from the media	Corporate Marketing & Communications
Global Government Affairs Office	Questions about political contributions and governmental issues	866-531-4845 Email: globalgovernmentaffairs@te.com
Internal Audit	Questions about financial procedures and practices	

ADDENDUM TO THE GUIDE TO ETHICAL CONDUCT FOR EMPLOYEES IN EU-MEMBER STATES

Consistent with the statement in the Guide to Ethical Conduct (Guide), the Guide offers general guidelines only and is subject to the local laws of the countries in which TE operates. This Addendum reiterates that the Guide is subject to the recommendations of the Art. 29 - Data Protection Working Group of the EU-Member States with regard to reporting systems, such as our ConcernLINE or the ConcernNET.

Please note the following:

- Your obligation to report any violations of the Guide is encouraged, but is not mandated.
- You shall report any claims which are related to accounting, audit or financial controls or related to an issue of illegal conduct (SOX issues) via the reporting systems.
- You are highly encouraged to report claims which are not related to SOX issues directly to HR or your management.
- You are encouraged to identify yourself when reporting a violation. If you prefer, you can report anonymously as far as permitted by law.
- Any abuse of the reporting system may subject you to disciplinary action and judicial proceedings. Good faith use of the reporting system, however, will not subject you to any liability or sanctions.

MY COMMITMENT STATEMENT

(Check the boxes that are applicable)

- I confirm that I have read and understand TE's Guide to Ethical Conduct. I commit to embrace and utilize our Guide's principles in my daily work activities. I understand that everyone working at TE or on TE's behalf is required to comply with the policies outlined in our Guide unless this would create a conflict with applicable laws.
- I am not willing to embrace and utilize our Guide's principles in my daily work activities.

CONFLICTS OF INTEREST:

(Check the boxes that are applicable)

- I confirm that I have read TE's Policy Avoiding Conflicts of Interest (TEC-01-24) and that I do not have a conflict of interest that could divert my time, interest or responsibility from TE.
- I wish to seek advice or disclose a possible conflict of interest, outside employment, board membership or other activity. A member of the Human Resources or Ethics and Compliance team will contact me to provide more information.

ANYTHING TO REPORT?

(Choose one)

- I wish to report a previously unreported violation of the Guide to Ethical Conduct.
- I have nothing to report.

Date: _____

Name: _____

Signature: _____

Network ID: _____

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