
Policy Governing Political Activities and Government Engagement

1. PURPOSE

The intent of this Policy is to ensure that TE Connectivity and its subsidiaries and affiliates (collectively "TE" or the "Company") are involved in political activities and government engagement in accordance with the standards established in this Policy, other Company policies and as stated in the TE Guide to Ethical Conduct, comply with all applicable laws governing its political activities and government engagement, and maintain a unified voice on public policy issues of a business interest to TE, as well as on any other requests made to government officials.

2. SCOPE

This Policy applies to all TE employees worldwide. TE Connectivity's Policy Against Corruption and Governing Conduct with Government Officials details specific requirements with respect to expenditures and Anything of Value (as defined in Section 4 of the Anti-Corruption Policy) connected with Government Officials.

3. RESPONSIBILITY FOR ADMINISTRATION AND IMPLEMENTATION

Management, legal counsel and communication leaders at each TE business unit are responsible for the implementation of, and compliance with, this Policy within their respective business units.

The TE Vice President of Global Government Affairs is responsible for the maintenance and revision of this Policy.

The TE Vice President of Global Government Affairs, in consultation with the TE General Counsel, is authorized to form committees and develop and implement programs within TE to carry out the purposes of this Policy.

Questions on interpretation of this Policy should be referred to the TE Vice President of Global Government Affairs.

4. APPLICABLE DOCUMENTS AND FORMS

The following documents and forms constitute a part of this specification to the extent specified herein. Unless otherwise specified, the latest issue of the document applies.

- TEC-01-25 Policy Against Corruption and Governing Conduct with Government Officials
- TEC-407-1194 Mandatory Procedures Governing Gifts and Hospitality, Travel and Lodging for Government Officials and Anti-Corruption Certification

5. BACKGROUND

Laws, regulations, programs and policies developed and administered by government officials have an impact on our business and on our methods of operating. They can present obstacles by restricting our activities or adding to our costs or they can improve our competitiveness by opening markets, reducing barriers to commerce and providing a variety of political and financial resources. As a corporate citizen in many jurisdictions around the world, TE and its employees have the right and responsibility to be informed about government decisions, to appropriately communicate our interests to government officials and to participate actively in shaping public policy. In all jurisdictions, TE will comply with the laws and conduct its business activities according to the highest ethical standards.

The Company strongly encourages its employees to become involved in civic affairs and to participate in political activities. Managers also are encouraged to participate actively in helping to shape public policies that affect their businesses, in consultation with the TE Global Government Affairs Office.

6. APPLICATION

Functional responsibility for securing government/official support for our domestic and international businesses and for representing our interests when government policy decisions are made rests with the TE Global Government Affairs Office. All government affairs activity is to be carried out in accordance with this Policy and in consultation with the Global Government Affairs Office in order to maximize our effectiveness and to ensure that TE contacts with officials and its positions on issues are consistent, legal, ethical and credible.

6.1. Global Government Affairs in the United States

A. Federal Government Affairs

1. Contacts with Government Officials

The staff of the Global Government Affairs Office is the focal point for representing TE policy and political interests to elected and appointed governmental officials. As registered lobbyists, they are to comply with all U.S. federal laws and regulations, including the Lobbying Disclosure Act. Except as provided below, no employee may act as a lobbyist, may hire a lobbyist or political consultant, or engage in any activity for political purposes including visits, letters, telephone calls and other types of formal and informal communications with government officials on behalf of TE, nor may any employee give a gift or extend hospitality to a government official, without the prior approval of the Global Government Affairs Office.

- a. **Government Affairs Representatives:** The Global Government Affairs Office has identified or may identify certain TE employees located in congressional districts with a high concentration of TE employees to assist in corporate outreach. At the direction of the Global Government Affairs Office, these employees will represent TE and be responsible for maintaining regular contact with their local elected officials and promoting TE's presence in these congressional districts.
- b. **TE Management:** Occasionally, the Global Government Affairs Office will ask TE managers to represent the Company on specific issues with elected officials.
- c. **Employees Engaged in Routine Government Contract Marketing and Administration:** TE employees of business units engaged in contracting activity with the U.S. Federal government may pursue routine marketing, proposal and contract administration interaction with U.S. Federal Government officials in response to solicitations contained in the Federal Register and publications like Commerce Business Daily and Federal Business Opportunities or based on the terms of existing contracts. However, the Global Government Affairs Office shall be notified of any other communication with U.S. Federal Government officials for the purpose of contract marketing in order to ensure compliance with all disclosure requirements.

2. Political Activity in TE Facilities

Visits to TE sites by elected or appointed officials or political candidates are a very effective way for government officials to learn about TE and its businesses and products. Such visits to TE facilities are encouraged, but are to be managed by the Global Government Affairs Office.

There are specific regulations governing appearances of candidates at Company-sponsored functions. Accordingly, such visits must also be discussed and approved in advance by the Global Government Affairs Office to ensure maximum benefit to the Company and compliance with applicable regulations.

No political signage is permitted or may be posted on/in a Company facility.

3. Political Contributions and Election Campaign Activities

Federal laws and regulations regulate contributions and expenditures by TE and use of its facilities and personnel in connection with the election of candidates to public office. It is the policy of TE to adhere strictly to such laws.

A political contribution is anything of value, including personal services, given to a person running for a public office, his or her campaign, or to a political party or other political entity. Political contributions include, but are not limited to, providing funds, purchasing tickets to political events, providing gifts, furnishing Company goods or services (including in-kind goods or services), providing transportation, loaning Company personnel during working hours, or paying for advertisements or other campaign expenses to or on behalf of candidates, political parties or political action committees. Except as provided below, no employees shall cause TE to contribute directly or indirectly any money, property, facilities or services of TE to any candidate for any federal office or to any committee for such candidate, or to any political party or other political committee. Any such activity may be a serious violation of Federal election law and could result in adverse consequences.

- a. The TE Connectivity Inc. Employees Political Action Committee: Although the Company is prohibited from using general treasury funds to make contributions and expenditures in connection with a federal election in the United States, TE is permitted to establish a political action committee or "PAC" and to have the PAC make solicitations for political contributions and expenditures. The PAC, also known as a separate segregated fund (SSF), may solicit eligible employees for personal contributions to be used for these political campaign purposes. Contributions to the Company's PAC are encouraged but are not a condition of employment. Employees may refuse to contribute without reprisal.
- b. TE may pay expenses in connection with establishing, administering and soliciting contributions from eligible employees to the Company's PAC but may not contribute to the fund itself.
- c. Employees may engage in occasional, isolated and incidental voluntary campaign activities on behalf of a federal candidate off of TE premises during regular business hours. In-kind contributions of employee time or the use of Company equipment or office space are subject to strict Federal regulations and must be approved in writing in advance by the Global Government Affairs Office.

Foreign nationals are prohibited from making contributions in connection with U.S. federal, state and local elections, including managing a political action committee and making decisions about contributions or other campaign finance activity. This prohibition applies to TE companies that are either established under the rules of a foreign government or have their principal place of business outside the United States. If an individual is not a U.S. citizen and is not the holder of a "green card" from the United States government and living in the United States, then the foreign national prohibition also applies to that individual.

TE may communicate directly to executive and administrative employees, stockholders and their families on a political issue, partisan or non-partisan, in connection with a federal election and may communicate with all of its employees on a non-partisan basis subject to certain limitations, but all such communications must be reviewed in advance by the TE Vice President of Global Government Affairs.

4. Personal Political Activity

There is no restriction on lobbying or other political activities by employees on matters unrelated to the Company. Employees must recognize that their involvement and participation in other forms of political activity must be on an individual basis, on their own time, and at their own expense consistent with federal and state laws. Further, when an employee speaks on public issues outside of the Company, it must be made clear that comments or statements made are those of the individual and not the Company. Company premises, stationery, email accounts, telephones, vehicles, funds and other property may not be used for personal political activities.

B. U.S. State and Local Government Affairs

The Global Government Affairs Office is responsible for the Company's political interests at the state and local levels. It works with business unit and corporate function staff to identify and address legislative and regulatory threats and opportunities. The Global Government Affairs Office is also a clearinghouse of legislative and regulatory information and resources to the business units and corporate functions.

1. Contacts with State and Local Government Officials

Business unit and corporate function outreach to state and local officials and regulators that is outside the regular course of business and not part of the ongoing sales process must be initiated and managed through the Global Government Affairs Office. This includes, but is not limited to, meetings, telephone calls, plant tours, appearing before legislative committees or regulatory agencies whether to offer formal testimony or informal views, and giving gifts and extending hospitality to state or local officials. Some state and local jurisdictions and agencies may consider official governmental contacts during the procurement process to be a form of lobbying and therefore subject to disclosure. The Global Government Affairs Office shall be notified of any communication with state and local officials during the procurement process in order to ensure compliance with all rules and disclosure requirements. The Global Government Affairs Office will work with all sales personnel who are required to register as a lobbyist or to disclose any political activity to ensure that the appropriate

material is properly filed. No TE employee may register as a lobbyist without the prior written approval of the VP of Global Government Affairs. The Global Government Affairs Office will maintain a list of all TE employees registered as lobbyists and/or required to file other disclosures.

2. Political Contributions and Election Campaign Activities

Under certain circumstances and when allowed by law, TE companies organized under the laws of any state and having their principal place of business in the United States may contribute to candidates, ballot initiatives and referendums at the state and local level using Company resources. However, such activity must be reviewed and approved in advance by the Global Government Affairs Office and determined to be legally permissible.

Some state and local jurisdictions and agencies have enacted “pay-to-play” laws which seek to restrict or regulate political contributions and/or gifts by business entities doing business with or seeking to do business with government entities, and may impose certain disclosure and certification requirements for business entities that bid or receive certain government contracts/business. While the laws vary widely among states and local jurisdictions, they generally assert that campaign contributions made by a company, its officers, or family members of officers, and those employees involved in the contracting process could bar the company from being awarded a government contract. Violations during the procurement process for a state or local contract may also result in fines and other penalties. State and local campaign and election laws vary widely and require careful review prior to making such contributions or expenditures. Thus, no employee shall cause TE to contribute directly or indirectly any money, property, facilities or services of TE to any candidate for any state or local office or to any committee for such candidate, or to any political party or other political committee without prior review and approval of the Global Government Affairs Office. Any such activity may be a serious violation of state or local election law and could result in adverse consequences.

The Global Government Affairs Office will prepare and maintain records of all such activity as well as prepare and file disclosure reports where required.

6.2. Global Government Affairs Outside of the United States – Contacts with Government Officials

TE employees should not act as lobbyists or engage in any political activity including visits, letters, telephone calls and other types of formal communications with government officials outside the United States on behalf of TE without prior approval of the Vice President of Global Government Affairs. No gifts or hospitality may be given to or received from government officials outside of the United States without prior approval of the Vice President of Global Government Affairs.

6.3. Hiring Lobbyists and Political Consultants

It is the policy of TE to comply with the legal and ethical standards regarding the retention of lobbyists and other political consultants, including applicable reporting requirements. No TE employee or business unit may retain or compensate a lobbyist or other political consultant without the prior written approval of the Vice President of Global Government Affairs. The identification and hiring of lobbyists and political consultants focused on policy and political issues of interest to the business units will be coordinated with the Global Government Affairs Office. Before any lobbyist or other political consultant is retained, they must sign a service contract prepared, approved and signed by the VP of Global Government Affairs.

6.4. Trade and Business Associations

In many instances, TE and its subsidiaries may find it beneficial to join trade or business associations that help promote their business interests. It is the responsibility of the TE subsidiaries and business units to notify the Vice President of Global Government Affairs of any memberships in any trade or business associations so the Global Government Affairs Office can leverage, when applicable, the resources of the trade or business association to further the Company's business interests. The Global Government Affairs Office also may serve as a primary Company representative with trade associations or other organizations working on key international, federal and state legislative or regulatory issues.

On occasion, management may be asked by a trade or business association, a customer, or a supplier to help endorse a position on a specific policy or political issue. Activities may include, but are not limited to, testifying in front of elected officials, signing or sending a letter or visiting an elected official's office. The Vice President of Global Government Affairs must be notified of all such requests.