



## Reporting and Investigating Misconduct

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### 1. PURPOSE

This Policy (“Policy”) is intended to establish procedures and responsibilities for reporting alleged violations of applicable laws or regulations, the TE Guide to Ethical Conduct (“Guide”), TE policies and procedures, and for the investigation of those reports.

### 2. SCOPE

This Policy applies to TE Connectivity Ltd. including its subsidiaries, affiliates, business units, and divisions worldwide (“TE” or the “Company”).

### 3. RESPONSIBILITY FOR IMPLEMENTATION

The Ethics and Compliance team, and the Office of Ombudsman.

#### 3.1. Reporting and Reporting Channels

TE employees are expected to report to the Company any alleged violations of applicable laws or regulations, TE policy, and/or the Guide, as well as ethics and compliance issues and concerns about alleged misconduct or mistreatment, related to the conduct of TE’s business to the extent permitted under applicable law. TE Employees may report these matters to managers, the Human Resources Department, Law Department personnel, the Ethics and Compliance team, Internal/Forensic Audit, the Employee Relations Center of Excellence, or directly to the Office of Ombudsman. Matters not directly reported to the Office of Ombudsman which warrant investigation shall be escalated to the Office of Ombudsman for oversight and/or review for compliance with this Policy. The TE ConcernLINE and ConcernNET are also available as confidential and, where permitted by applicable law, anonymous reporting mechanisms. Non-anonymous reporting is strongly encouraged, and the reporter’s identity will be kept confidential through all stages of the process. The reporter’s identity may be disclosed to the people involved in conducting the investigation, who shall keep the reporter’s identity confidential, and may also be disclosed where required pursuant to applicable law, such as in the case of subsequent judicial proceedings. Malicious or abusive reporting (i.e., deliberately or knowingly reporting wrong or misleading information) will not be tolerated and may lead to disciplinary actions including termination. Employees, who submit a report pursuant to this Policy based on reasonable grounds or belief, will be protected from potential retaliation even if the concern reported is subsequently found to be unsubstantiated.

Third parties (including suppliers, vendors, customers, contractors and others) are also encouraged to report any perceived misconduct or alleged violations of applicable laws, regulations, TE policy or the Guide by a TE employee to the Office of Ombudsman. TE employees and third parties may also report any perceived or alleged violation of applicable local laws or other relevant TE policies by a TE business partner (whether direct or indirect), if such laws/policies require TE to monitor/investigate such violations of business partners.

The reporting channels provided by the Company are intended to help TE fulfill its obligations under the Sarbanes-Oxley-Act, the Dodd–Frank Wall Street Reform and Consumer Protection Act, and other applicable laws and/or regulations, and establish appropriate procedures as part of good corporate governance primarily to ensure compliance with respect to accounting, internal accounting controls, and auditing matters, and to avoid bribery, corruption, banking and financial crime, and other ethical or legal violations.

#### 3.2 Local Obligations to Communicate Resources

Each TE location is responsible for promoting the ConcernLINE and ConcernNET reporting resources, through the posting of materials provided by the Office of Ombudsman, which may include posters, digital signage and other awareness materials. Physical posters should be dispersed throughout the site in locations that are conspicuous and regularly visited by employees (canteens, manufacturing

floors, breakrooms, employee entrances/exits, etc.). To the extent possible, posters and other awareness materials will be made available upon request in most local languages and in English.

### 3.3. Specific Reporting Obligations for Attorneys

This Policy, and applicable laws and rules of professional conduct, impose specific additional obligations on TE attorneys. Attorneys who become aware of evidence of a material violation of the U.S. federal or state securities laws, a material breach of a fiduciary duty arising under those laws, or a similar material violation of any U.S. federal or state law or other applicable local laws must report that evidence to the TE General Counsel, the Chief Ethics and Compliance Officer, or the Office of Ombudsman.

### 3.4. Role of the Office of Ombudsman

The Office of Ombudsman shall be responsible for ensuring, and shall have oversight of, appropriate channels for the confidential and, where permitted by applicable law, anonymous submission of reports. The Office of Ombudsman shall maintain the confidentiality of reports to the fullest extent reasonably practicable and in accordance with applicable law. The Office of Ombudsman shall be responsible for the receipt, retention, and treatment of reports submitted pursuant to this Policy.

The Office of Ombudsman, as an independent resource, shall have oversight of all allegations of misconduct or mistreatment, violations of applicable law/policy or the Guide, which warrant investigation. TE expects employees to report such matters to the Office of Ombudsman timely and not to engage in any independent investigations of any perceived misconduct, mistreatment or violations of law, policy or the Guide without oversight of the Office of Ombudsman.

### 3.5. Investigations

The Office of Ombudsman shall ensure that all reports are appropriately addressed and investigated where the issues raised warrant investigation and sufficient information is provided to allow for investigation. The Office of Ombudsman shall promptly review reports and assign them for investigation, and a documentary record of all such reports will be kept in compliance with applicable laws. All investigations shall be conducted fully and fairly, regardless of what is at stake and who may be involved. Where necessary, information stored on TE owned computers and other devices used by a relevant employee may be accessed for investigation purpose unless prohibited by local laws. When a report does not merit further investigation, this conclusion and the reason for it will be documented. Each investigation will result in findings of fact, to the extent possible, and a resolution. A record of each investigation shall be maintained which shall include, without limitation, the allegations reported, a summary of the investigative activity undertaken and investigative findings, conclusions reached, any resulting recommendations for disciplinary action or other corrective action, and the final resolution.

If appropriate, the investigation team shall make a recommendation of disciplinary action or other corrective action which shall be carried out by the appropriate functions (including Human Resources) or management team. If such functions or management team disagree with the recommendation for disciplinary/corrective action in a case with the potential for implications beyond the local entity, the matter shall be presented to the TE Compliance Committee for final resolution. Human Resources shall work with the appropriate management team to ensure that any approved recommendation for disciplinary/corrective action is carried out.

### 3.6. Confidentiality and Prohibition Against Retaliation

Investigations shall be treated as confidentially as reasonably practical unless otherwise prohibited by local laws and regulations. All personal data shall be processed, transferred and stored in accordance with applicable laws and shall only be distributed on a need-to-know basis.

TE will not tolerate any retaliation or attempted retaliation by any person against employees who, based on reasonable grounds or belief, report a complaint or concern or provides information or assistance with any investigation under this Policy. However, such employees, although protected from retaliation for reporting or assisting with investigation, can be properly disciplined for unrelated misconduct or performance issues and are subject to the same standards of performance and conduct as all TE employees. If an employee believes they have been retaliated against for reporting or assisting with investigation, the employee should notify their manager, the Human Resources Department, Law Department personnel, the Ethics and Compliance team, the Employee Relations Center of Excellence, or the Office of Ombudsman. TE takes all complaints of retaliation very seriously. All such complaints will be reviewed promptly and, where appropriate, investigated. Any employee who violates this

prohibition against retaliation is subject to disciplinary action, up to and including termination of employment.

TE will undertake all reasonable measures to protect the data and reputation of all involved parties in any investigations to avoid stigmatization or victimization, including employees who are accused of wrongdoings.

### 3.7. Enhanced Whistleblower Protection Relating to the US Federal Contracts

In addition, TE will not discharge, demote, or otherwise discriminate against any person as a reprisal for disclosing information that he or she reasonably believes is (1) evidence of gross mismanagement of a US federal contract or grant, (2) a gross waste of the US federal funds, (3) an abuse of authority relating to a US federal contract or grant, (4) a substantial and specific danger to public health or safety, or (5) a violation of law, rule, or regulation related to a US federal contract (including the competition for or negotiation of a contract), subcontract or grant, provided that such disclosure is made to one or more of the following:

- A member of the US Congress or a representative of a committee of the US Congress;
- An Inspector General;
- The US Government Accountability Office;
- A US federal employee responsible for contract or grant oversight or management at the relevant agency;
- An authorized official of the US Department of Justice or other law enforcement agency;
- A court or grand jury; or
- A management official or other employee of the Company who has the responsibility to investigate, discover, or address misconduct.

A whistleblower who initiates or provides evidence of contractor, subcontractor, or grantee misconduct in any judicial or administrative proceeding relating to waste, fraud, or abuse on a US federal contract or grant shall be deemed to have made a disclosure protected by this Section.

A whistleblower who believes that he or she has been discharged, demoted, or otherwise discriminated against for a disclosure protected by this Section may submit a complaint to the Inspector General of the executive agency concerned in accordance with such executive agency's policies and procedures. Notwithstanding the foregoing, a complaint may not be brought under this Section more than three years after the date on which the alleged discharge, demotion, or other discrimination took place.

### 3.8. Reporting to the Audit Committee

The Ombudsman shall report regularly to the Audit Committee on the receipt, retention, overall volume, and treatment of concerns received by the Company regarding accounting, internal accounting controls, auditing matters, or potential legal or ethical violations or other misconduct with the potential to seriously harm the Company's reputation, including those unresolved from prior reports (collectively, "Significant Matters"). The Ombudsman shall immediately report to the Audit Committee Chair any and all complaints or concerns with respect to accounting, internal accounting controls, auditing matters, or potential legal or ethical violations involving the Company's Chief Executive Officer, Chief Financial Officer, Controller, Vice President of Internal Audit, Independent Auditor or General Counsel.

At each meeting of the Ombudsman with the Audit Committee, there shall be an opportunity for an executive session without other members of management present.

The Ombudsman shall keep the Chief Compliance Officer and TE General Counsel informed about all pending investigations of Significant Matters.

## 4. PUBLICATION

This Policy shall be made available to all employees and posted on TE's corporate website.