

# Global Code of Conduct

Acting with Integrity and Trust

# A Message from Pierre Chen

At YAGEO Group, **Empowering the Future with Innovative Component Solutions** is our collective Mission, and we believe that we will achieve it by acting out our Values of **Customer Focus, Integrity and Trust, Agility and Speed, Collaboration and Team, and Sustained Innovation** every day. Being part of the YAGEO Group means making sure that our conduct is always shaped by these Values and that we act with integrity and transparency wherever and whenever we do business.

I am proud to present our unified YAGEO Group Global Code of Conduct ("Code"). Our Code is an important tool to ensure we understand what is expected of us, and to help guide us in our efforts to conduct business with integrity. All employees are required to understand and comply with our Code. I encourage you to use this Code as a resource any time you have questions about the right thing to do. While our Code cannot address every situation we may face, it does provide a firm foundation upon which we can make sound decisions that are consistent with our Mission and Values.

We each have a role in making sure our business is conducted in the right way and that we always follow our Code, our policies, and the law. It is also our responsibility to speak up and ask questions or report concerns when we see something that doesn't seem to comply with our Code. To do so, we must familiarize ourselves with the reporting resources available to us.

Our Mission is clear. We have significant goals. I am confident we can achieve them if we work together and rely on each other – and our Values – to maintain our position as an industry leader. The path to success starts here with our Code.



Pierre Chen,  
Founder and Chairman



Our Code is an important tool to ensure we understand what is expected of us, and to help guide us in our efforts to conduct business with integrity.

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# Mission

*Empowering the Future with Innovative Component Solutions*

## CUSTOMER FOCUSED

### **Relentless commitment to our customers and partners.**

Our customers and partners are the reason for our business success. At all times and around the world, we are committed to listening and responding positively to their needs, solving problems proactively and quickly, and not stopping until we provide solutions. We are located where our customers are and have a global view with local expertise.

Employees are representatives of the YAGEO brand each time they engage with customers.

## INTEGRITY AND TRUST

### **Courage to always do the right thing, no matter who is watching.**

Our reputation depends on the highest principles and standards of ethical behavior. All employees, regardless of role, have a responsibility to work with integrity and to follow our Code of Conduct. We do not state opinions as facts or act under pressure to violate established standards. We are consistent in our words and actions, and we trust and respect others. We deliver our commitments on time and with the highest quality to customers, partners, and communities where our facilities are located.



## SUSTAINED INNOVATION

### **Leveraging our talents with ethical and sustainable material science to create breakthrough technologies.**

Innovation inspires and drives us, and our success results from our expertise in exploring new methods and ideas beyond conventional boundaries. We cultivate partnerships with ethical suppliers who support sustainable material development as part of our technology mission. We look ahead to future trends, and customer needs with a focus on sustainability.

## AGILITY AND SPEED

### **Individual and organizational responsiveness to achieve extraordinary results.**

We act with urgency to achieve effective, fast, and flexible solutions. We are committed to agility in our decision-making and planning without over-promising or under-delivering. We respond quickly to new opportunities, remain open to change, and have the courage to change direction when needed.

## COLLABORATION AND TEAM

### **One global team valuing diversity and inclusion.**

We perform at our best and achieve more as one YAGEO Group when we collaborate across boundaries, have a mutual commitment to support each other, and give others credit when appropriate. We accomplish this when we trust each other, encourage diversity in our workplace, value individual capabilities and contributions, and recognize that work is but one part of a full and rewarding life. We value risk-taking and view failure as an opportunity to learn.

# About Our Code

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We are a global company with a diverse team of talented people around the world working together to achieve our Mission of Empowering the Future with Innovative Component Solutions. Our people and our culture are critical factors in our continued success. Being part of the YAGEO Group ("Company" or "YAGEO Group") means making sure that our conduct is always shaped by our common Values of **Integrity and Trust**, and that we act ethically, responsibly and in compliance with the law wherever we do business.

Our Global Code of Conduct ("Code") is an important resource to ensure we understand what is expected of us, and to help guide us in our efforts to conduct business with integrity. Every day, each one of us makes decisions that can have a lasting impact, good or bad, for ourselves and for our Company. Although this Code may not cover every situation you will encounter, it will help you make responsible, lawful, and ethical decisions as you go about your daily work. It also provides important information about where you can go for additional guidance or to report concerns. More detailed information on topics addressed in this Code can also be found in your local Company policies.

The principles in our Code apply to all officers, directors, and employees of the YAGEO Group, its subsidiaries, and affiliates worldwide. We expect everyone to read, understand, and comply with our Code.

We are also committed to complying with the Responsible Business Alliance (RBA) Code of Conduct which establishes standards to ensure that working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. The RBA Code of Conduct can be viewed [here](#).

We expect everyone working on the Company's behalf, including suppliers, agents, contractors, distributors, and business partners to adhere to the RBA Code of Conduct standards.



# Our Responsibility

Building a culture of **Integrity and Trust** requires the commitment of every employee. We are each responsible to:

- comply with this Code and any laws or Company policies that apply to our work;
- complete any required training so we understand what is expected of us;
- seek advice from our manager or the appropriate Company resource if we have a question;
- speak up if we see something that doesn't fit with the spirit or intent of this Code; and
- cooperate fully and honestly in the investigation of any possible violation of our Code, our policies, or the law.

Managers have additional responsibilities to:

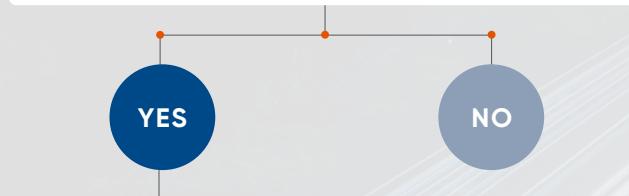
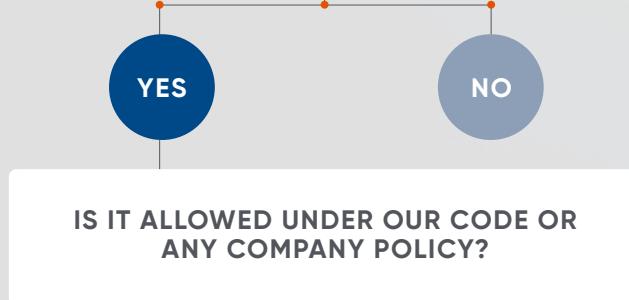
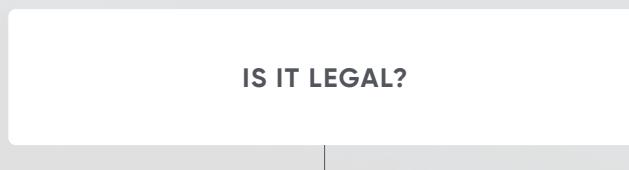
- role model the right behavior;
- clearly communicate ethics and compliance expectations with employees;
- create an environment of openness and trust that allows employees to ask questions or raise concerns without fear of retaliation; and
- address employee concerns promptly, appropriately, and with care and respect.



# Making the Right Decision

Acting with Integrity and Trust means having the courage to always do the right thing, no matter who is watching.

In every situation, we expect you to use your best judgment, but if you are ever unsure what to do, ask yourself:



IS IT CONSISTENT WITH OUR VALUES?

YES

NO

WOULD I BE COMFORTABLE IF IT BECAME PUBLIC?

YES

NO

If you answer "no" to any of these questions or if you still aren't sure about the right course of action, seek guidance from the appropriate Company resources listed in the **Resources** section of this Code.



Keep in mind, if local law or practices conflict with the guidance in our Code or policies, we follow the stricter standard.

# Speaking Up

We are each responsible for speaking up when we have a question or when we see something that we believe is, or may be, a violation of the law, Company policies, or this Code. This includes possible violations by our employees, suppliers, business partners, or anyone else acting on behalf of the Company. We know it can seem easier to stand by and hope that someone else will raise a concern, but we cannot address the issue if we do not know about it. Speaking up is the right way to build a culture of integrity and to protect ourselves and our Company from possible harm.

You can ask questions or raise concerns to:

- your Supervisor, Manager, or any member of management;
- your global compliance resource;
- your Human Resources Representative;
- the Chief Compliance Officer; or
- the Head of Legal in your division.

It is often best to speak directly to one of the resources listed above, but if you are uncomfortable with that for any reason, you may choose to use the Ethics Hotline. The **Ethics Hotline** is administered by an independent company to allow for confidential and/or anonymous communication online or through the telephone in your preferred language. When you ask a question or make a report on

the Ethics Hotline, no identifying information will be provided to the YAGEO Group unless you choose to identify yourself. Anonymous reporting is available only where local laws allow it. Details for using the Ethics Hotline can be found in the **Resources** section of this Code.

We take all such matters seriously and confidentially manage all reports. No matter who you contact or which resource you choose, your concern will be promptly reviewed and, if necessary, investigated by the appropriate team. We expect you to cooperate fully and honestly in any such investigation. Confirmed violations of our Code, our policies, or the law will result in disciplinary action up to, and including, termination of employment. Results of the investigation and discipline process may be provided to those making the report, if providing those details does not violate privacy considerations and will not hinder further investigation or remediation.

We do not tolerate retaliation against anyone who speaks up in good faith. Examples of retaliation might include demotion, firing, a reduced salary, job reassignment, threats, harassment, exclusion from team activities, or any other negative action taken against someone because they raised a concern or participated in an investigation. Every employee should feel free to ask questions, report concerns, or participate in investigations

without fear of reprisals. Retaliation against anyone for speaking up about a potential violation is against the law and Company policy. If you feel that you or someone else has been retaliated against as a result of raising a concern or participating in an investigation, you should immediately contact one of the Company **Resources** listed in our Code.

## Speak Up When You Believe Something May Be:

- A violation of the law or regulations
- An employee violation of the YAGEO Group Global Code of Conduct
- A violation of Company policies
- A supplier or business partner violation of the RBA Code of Conduct

## GOOD FAITH

**Good Faith** means that to your knowledge, the information you are providing is complete, truthful, and accurate.



# Acting with Integrity and Trust in Our Workplace



# We Promote a Safe and Healthy Workplace

While we value **Agility and Speed** as we work to achieve our Mission, we never do so in a way that would compromise the health and safety of our people. Our health and safety measures are rooted in our safety-oriented culture and extend beyond rules and standards. We believe workplace injuries or illnesses are preventable, which is why we invest in and incorporate safe practices and procedures in our daily routines. We all share a responsibility to make the safety of ourselves and our co-workers a priority every day.

Part of having a safe workplace is having a substance-free workplace. We do not conduct our work, including operating any Company equipment, under the influence of alcohol or drugs. Selling or distributing alcohol or illegal drugs while on Company property or while conducting your job duties is prohibited. Employees with a valid prescription may take that medication as long as it does not interfere with their work responsibilities or create a safety threat. Responsible consumption of alcohol during meals or entertainment of clients is allowable but you should never drink to excess, and you should take appropriate measures to ensure everyone gets home safely. Keep in mind, serving alcohol on Company property requires special approval.

We do not tolerate violence, threats of violence, or bullying of any kind in our workplace. We are all required to speak up and promptly report safety concerns, noncompliance with safety policies or regulations, substance abuse, threats of violence, or anything else that could pose a risk to the health and safety of our people or our workplace to the appropriate Company **Resource** listed in this Code.

**Q**

Shu-fen noticed a co-worker was not wearing the required Personal Protective Equipment (PPE) in the manufacturing facility. She knows people don't like to wear it because it is uncomfortable, but she always wears hers and would hate to see someone get hurt. What should she do?

**A**

Shu-fen should remind her co-workers about the importance of wearing the required PPE and discuss it with her manager. It is important to report anything that may increase the possibility of injury or contribute to unsafe working conditions.



# We Treat Each Other with Respect

We are one global team who values diversity and inclusion. Our Company is a reflection of our people. From the very beginning, we have attributed our growth and success to the people who have helped develop it. We believe in the power of tomorrow and a diverse, inclusive workplace where everyone can contribute to the Company's success by leveraging their own unique ideas, talents, skills, and experiences. We represent cultures from around the world, but while we celebrate our differences, we share a common commitment to our Values and mutual respect.

Treating each other with respect means we:

- value the diversity of each other's backgrounds, talents, abilities, and experiences;
- provide equal opportunity for all employees, basing hiring and promotion decisions only on an individual's skills and abilities for the role;
- never discriminate on the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, genetic information, marital status, or any other characteristic protected by law; and
- do not tolerate harassing or bullying behavior of any kind.

If you are aware of any discriminating, bullying or harassing behavior, you must report it immediately to an appropriate Company **Resource** listed in this Code or through the Ethics Hotline. Anyone engaging in such behavior will face disciplinary action up to, and including, termination.



## HARASSMENT

**Harassment** is any unwelcome conduct that might reasonably be expected or perceived to cause offense or humiliation to another person or interfere with their ability to do their work. It can take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment.



# We Protect Personal Information

Our fellow employees and others we do business with trust us with their personal information. Personal information includes telephone numbers, email addresses, banking or financial information, government identification numbers, medical information, biometrics, race, and ethnicity, among other things.

It is our responsibility to protect this information by complying with the applicable privacy and data protection laws in place wherever we do business.

We do this by ensuring that we:

- collect, hold, use, or process only the personal information we need for legitimate business purposes;
- share it only on a need-to-know basis or when required by law;
- protect the information from potential loss, misuse, or disclosure while it is in our custody; and
- report any possible violations to the appropriate Company resource listed in this Code.

Privacy and data protection laws are complex and vary by country. If you work with personal information as part of your job responsibilities, it is important to work with your local Legal, Human Resources or Data Protection resource to be sure you understand what is required.

**Q**

Chin-lung works in Human Resources and was emailing some personal employee data to the Company's health insurance provider when he realized he used the wrong email address. He received no response. What should he do?

**A**

Chin-lung must report the data breach immediately using the [soc@yageo.com](mailto:soc@yageo.com) email address so that the proper steps can be taken to comply with the law and Company policy. Privacy and data protection laws are complex, vary by country and require specific actions to be taken within a certain timeframe when such a breach occurs.



# We Avoid Conflicts of Interest

To achieve our Mission, we must work together for the best interests of the YAGEO Group and cannot compete with the Company or take personal advantage of opportunities that may come our way because of our employment with the Company.

A conflict of interest can arise from any situation that may divide our loyalties, interfere with our ability to make objective business decisions, or cause us to act, or appear to act, in any way that is not in the Company's best interest. It isn't possible to list every situation that may cause a potential conflict of interest here, but some examples include:

- working for, or having an ownership interest in, a competitor, supplier, or customer of the Company;
- having a second job that interferes with your work at the Company or using Company assets for personal gain;
- having a family or close personal relationship with someone who directly or indirectly reports to you;
- being involved in the selection process of a new employee, supplier or other business partner when the applicant is a family member or someone with whom you have a close personal relationship; or
- holding a public office that may require you to handle issues of interest to the Company.

Acting with **Integrity and Trust** means we must be transparent and disclose any potential conflict of interest to our manager or other appropriate Company resource listed in this Code so they may help us resolve it. Even the appearance of a conflict of interest can erode trust and hurt our reputation. If you are unsure about a particular situation, be proactive and disclose it.



## CLOSE PERSONAL RELATIONSHIPS

**Close personal relationships** include family relationships and relationships of a romantic, intimate or sexual nature, or close personal friendships that may influence your decision-making and cause you to act other than in the best interests of the YAGEO Group.



**Q**

Ben's cousin owns a company that recently became a supplier to YAGEO. Ben wasn't involved in the selection of his cousin's company but is worried because he read something in the Code about potential conflicts of interest related to family members or friends who work for suppliers. He isn't sure if this would be considered a conflict of interest. What should Ben do?

**A**

Ben should discuss the situation with his manager. As long as Ben discloses the relationship, doesn't have any influence over YAGEO's business with his cousin's company or affect his decisions or actions regarding his work at the Company, it is probably okay. It can be hard to sort out what is and is not a potential conflict of interest and how best to handle it, so keeping your manager informed is the best way to ensure that you are fulfilling your responsibility.

**Q**

Grace earns extra money by participating in a multi-level marketing company that sells products for the home. She does it on her personal time, so she doesn't think it interferes with her work at YAGEO. She does try to sell her products to her employees and even get them to join her at the multi-level marketing company so they can earn extra money too. Is that okay?

**A**

No. Having a second job that doesn't interfere with Grace's job at the Company, is conducted on her own time with her own resources may be acceptable; but soliciting her employees to buy products from her or join her at the multi-level marketing company is inappropriate. Because of her position as their manager, Grace's employees may feel pressure to participate in order to please her. They may feel that they would suffer negative consequences at work if they don't participate. In this case, Grace is taking advantage of her position at YAGEO for personal gain which creates a conflict of interest.

# We are Careful in our Communications

We value **Collaboration and Teamwork**. We believe we perform at our very best when we work together as one YAGEO Group collaborating across boundaries. To do this effectively, we communicate with each other and our business partners through various forms of communication such as emails, instant messages, text messages, and other documents. We must think carefully about the words we use in these communications, be factual, and write each message as if it could become public.

Social media is another avenue for communicating with people inside and outside the Company. It can be used effectively by people authorized in the Company to promote our brands and to engage with our customers and other stakeholders. It is important to remember that if we are expressing our own opinions online, we must make it clear that we are speaking for ourselves and not on behalf of the Company.

In whichever manner we communicate, always remember:

- do not communicate in a way that may violate our Code or other Company policy; and
- electronic communications are permanent and retrievable, even if deleted, and can be used as evidence in investigations or court proceedings.

On occasion, members of the media, financial analysts, or other interested parties may contact us to learn more about our Company. To ensure they receive information that is accurate and consistent, only those employees that have been specifically authorized to speak on behalf of the Company may do so. If you receive a request for information from outside the Company, contact the appropriate Company **Resource** for guidance.

**Q**

Susan is active on social media where she talks about what's going on in her life and posts a lot of pictures. Sometimes she tells stories about things that happened at work. Is that okay?

**A**

It depends. If Susan is talking about her work, she must:

- be clear that she is not speaking on behalf of the Company;
- not disclose any confidential or proprietary information about our Company, our employees, our customers or business partners;
- avoid harassing or discriminatory comments; and,
- remember she is responsible for the content she publishes.

**Q**

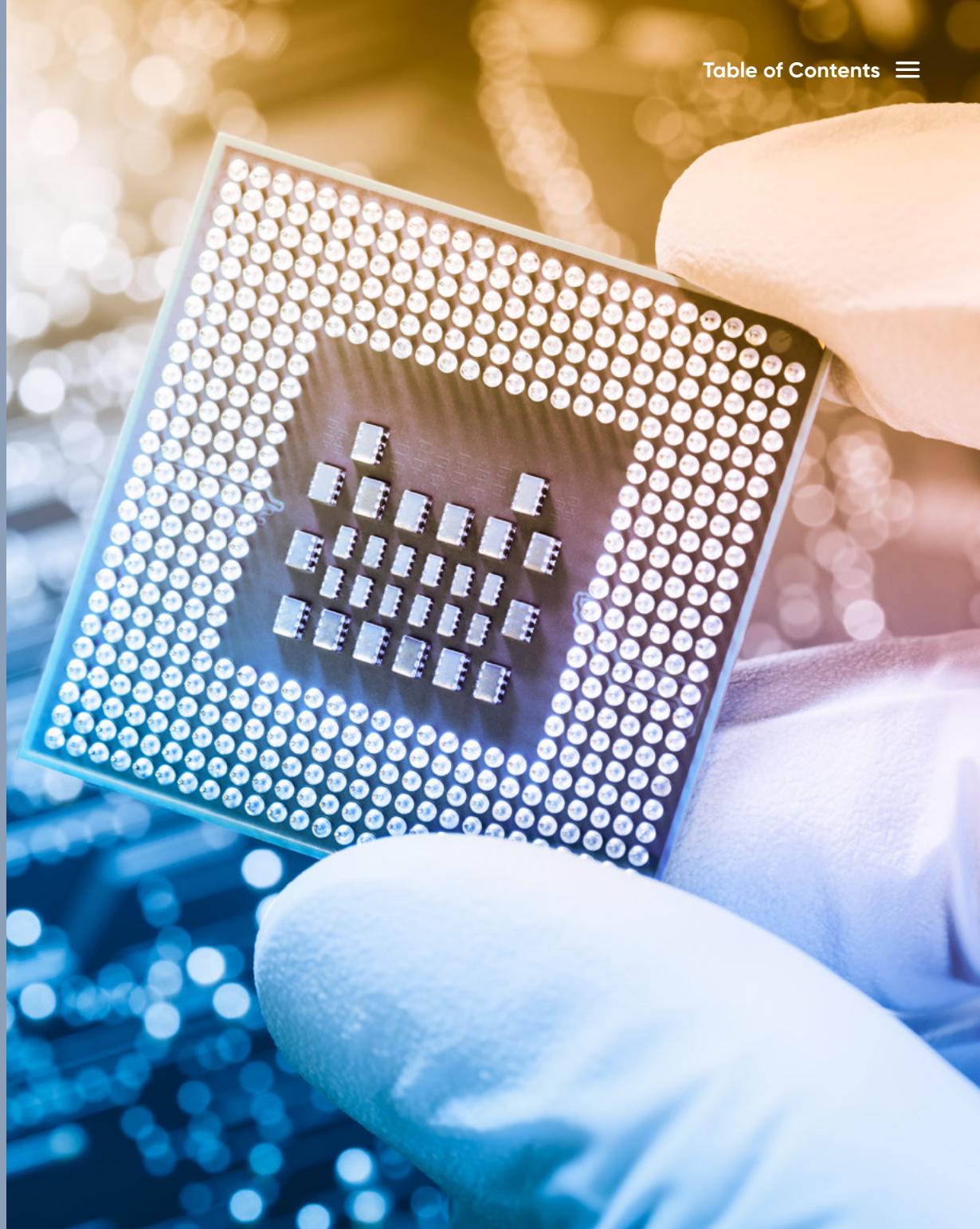
Hamish saw a posting on social media that includes incorrect information about one of our products of which he is familiar. Should he post a response correcting the information?

**A**

No, only those who are authorized to speak on the Company's behalf should post information about our products on social media. Hamish should alert his manager or the appropriate Company **Resource** to the post so they can address it.



# Acting with Integrity and Building Trust in the Marketplace



# We Compete Fairly

We compete fairly in the marketplace by following the laws that protect free and fair competition around the world. Though these laws, known as competition or antitrust laws, are complex and vary by country, common principles apply. We must never make an agreement (informal or formal, written or verbal) with a competitor to:

- Fix or set prices;
- Agree on bid terms;
- Allocate customers or markets;
- Limit production or sales, or condition sales on other purchases;
- Unduly limit a customer's ability to sell a product; or
- Attempt to monopolize a market, including by pricing products below cost.

We must always be careful when we interact with our competitors so that there can be no perception that we are engaged in any improper discussions or agreements. Even the appearance of violating competition laws can be a problem. It is important to keep this in mind when attending trade shows or other events where competitors might be present.

We are **Customer Focused**. We know our customers and business partners are the reason for our success, so we treat them with honesty and respect. We keep our promises to our customers, compete solely on the quality of our products, and never say anything false or misleading about our products or our competitor's products. We acquire customers and publicly available competitive intelligence through good work, not illegal or unfair practices.

**Q**

Francois has a customer that also buys from one of our competitors. During a recent meeting, the customer offered to show Francois the competitor's pricing. Is it okay for him to look at it?

**A**

No, the customer would likely be violating their confidentiality agreement with the competitor by sharing such non-public information and it is against our Company policy to obtain competitive intelligence in such a manner.



# We Protect Confidential or Proprietary Information

Many of us work with confidential or proprietary information about our Company, our customers, or our suppliers that must be protected. This type of information includes (but is not limited to) ideas, trade secrets, patents and trademarks, customer listings, marketing and sales data, strategic plans, financial information, and research.

We protect this information by properly marking it confidential, storing and handling it securely, and only providing access to those who have a business need to know. Sharing confidential information outside these guidelines can be damaging to the Company's reputation or financial results.

Our obligation to protect the Company's confidential and proprietary information continues throughout and after our employment with the Company.

You can determine if the information you are working with is confidential and should be protected as such by asking yourself:

- Is it marked Confidential?
- Is it proprietary to us or to one of our customers or suppliers?
- Would our Company, our customer or supplier be disadvantaged if this became public?

If the answer to any of these questions is yes, you should treat the information as confidential. If you still have questions, contact the appropriate Company Resource listed in this Code for guidance.



# We Manage Gifts & Entertainment Responsibly

We build trust by acting with integrity in our relationships with our customers and other business partners. Reasonable gifts and entertainment may be used to further build those relationships; however, these activities should never be used to secure business or to improperly influence a business decision. We must remain independent and impartial in our business relationships and cannot let gifts and entertainment affect, or appear to affect, our business judgment.

We act with **Integrity and Trust** when we ensure gifts and entertainment given or received:

- are nominal in value and within Company expense limits;
- are not cash or a cash equivalent;
- are infrequent and for a bona fide business purpose;
- are exchanged openly and transparently;
- are not solicited or requested;
- do not create a conflict of interest; and
- do not violate the law or Company policy of either party.

When a customer has a strict no-gift giving policy (i.e. meals, entertainment, etc.) or a customer contract exists which limits the exchange and/or value of gifts and entertainment, interactions with that customer and its staff will adhere to that policy or contractual obligation.

Gifts and entertainment customs and rules may vary by location. Consult your local policy for more information or contact your Human Resources representative for further guidance.

## Q

Nigel works in purchasing and he just received an invitation from a supplier to play golf at an exclusive golf course. He has always wanted to play there but he isn't a member. Is it okay for Nigel to accept the invitation?

## A

Probably not. There are many things to consider:

- Does the value of the golf outing exceed what is acceptable under our policy?
- Will Nigel be making a decision to choose this supplier for work to be done; and could it affect, or appear to affect, his business judgment?
- Could the supplier be seeking to improperly influence Nigel?

Nigel should discuss the situation openly and transparently with his manager before making any decision.

## GIFT & ENTERTAINMENT EXPENSE LIMITS

ENTERTAINMENT	\$250 USD or local currency equivalent
GIFTS OR FAVORS	\$100 USD or local currency equivalent

Note: If local expense limits are different than those listed above, follow the lower limits.



# We Prohibit Bribery and Corruption

We are a global company and must follow the anti-corruption laws of any country where we do business. We are committed to do our part to make the world a better place by reducing corruption and increasing transparent business activity.

We succeed through our **Customer Focus**, our **Collaboration and Teamwork**, our **Agility and Speed**, our commitment to **Sustained Innovation**, and **Integrity and Trust** rather than through corrupt activities such as bribery or fraud.

We never offer anything of value to a government official or a commercial partner in an attempt to gain business or to improperly influence a business decision. These rules also apply to anyone acting or doing business on our behalf. We must be diligent in selecting business partners that comply with our standards for doing business ethically and in compliance with the law.

In some situations, government officials may seek facilitating payments to complete routine or official government actions, such as providing permits. We do not provide such payments.

All business expenses or payments of any kind must be completely and accurately recorded in our financial books and records.

Issues and laws related to corruption, bribery, and fraud can be complicated and the fines and penalties for companies who violate them can be significant. If you have any questions or concerns about a particular activity, transaction, or payment, you should report it to the Chief Compliance Officer, Legal Division, or another appropriate Company **Resource** listed in this Code.



## BRIBE

A **bribe** is anything of value given with the intent to improperly obtain influence, business, or some other advantage. It can be in the form of money, gifts, hospitality, expense reimbursement, favors, political or charitable contributions, or any other direct or indirect benefit. There is no set monetary threshold that defines a payment as a bribe and the bribery does not have to result in the intended advantage being received to be considered a bribe. It is the intent that matters.

## GOVERNMENT OFFICIAL

A **government official** is defined more broadly than just someone who is elected or appointed to public office. Other examples include:

- Customs or tax officials
- Regulatory agency officials
- Political candidates
- Military personnel
- Employees of government-owned or government-controlled businesses

It also includes the family members of these officials and anyone acting on their behalf.



# We Comply with Trade Regulations

As a leading global manufacturer and supplier of electronic components, we sell our products to customers and engage with suppliers all around the world. While we aspire to work with **Agility and Speed** in meeting our customers' needs, we must always take the time to ensure we follow all applicable laws and regulations that govern international trade. Import and export laws, trade embargoes and economic sanctions put in place by authorities apply to the movement of products, services, information and/or technologies across international borders. Trade restrictions take many forms, including bans on:

- Exports to a prohibited country;
- Travel to or from a sanctioned country;
- Financial transactions and dealings involving a sanctioned country or designated individuals and entities; or
- Participating, directly or indirectly, in boycotts imposed by certain countries.

We act with **Integrity and Trust** when we:

- follow all regulations and restrictions that apply to the transfer of products, services, information, or technologies across borders,
- ensure we have acquired any necessary licenses, and
- review any applicable sanctioned or restricted party databases to confirm the appropriateness of any such transfer.

We will not knowingly conduct business with anyone involved in criminal activities of any kind, including money laundering. We will only conduct business with reputable companies who are engaged in legitimate and lawful business activities and who are funded by legitimate sources.

Trade regulations are complex and subject to change, and violations can be costly. Contact the Chief Compliance Officer or other appropriate Company **Resource** listed in this Code if you have any questions on the right way to proceed.

**Q**

Monique overheard some co-workers discussing an upcoming sales proposal involving a foreign customer. She does not believe the appropriate steps were taken to ensure compliance with export laws. She asked the team and was told that the delay to complete the necessary steps would cause them to lose the business to a competitor. What should Monique do?

**A**

Monique should report it to her manager or the appropriate Company resource. Violations of trade regulations can be costly to the Company, so it is important that she share her concerns with someone who can investigate further.

## MONEY LAUNDERING

**Money laundering** occurs when money obtained from criminal activities such as terrorism, drug dealing or fraud are processed through legitimate commercial transactions to conceal the source, avoid reporting or evade taxes.



# Acting with Integrity and Building Trust in our Communities



# We Support Human Rights

We support the human rights of all people in the communities where we live and work. Forced labor, child labor, slavery and human trafficking are abhorrent abuses of human rights and we have taken the necessary steps to ensure such abuses do not occur within our supply chain or in any part of our business operations.

We provide our employees with fair and competitive compensation and benefits; and we respect their right to freedom of association and collective bargaining.

# We are Committed to Sustainability

We are committed to the protection of the environment and our natural resources by operating in a sustainable manner. We work to:

- prevent climate change and maintain biodiversity and ecosystems;
- conserve energy, water, raw materials, and other natural resources;
- reduce waste, greenhouse gas emissions, and the use of hazardous materials in our products;
- source minerals responsibly;
- meet or exceed all applicable regulatory compliance obligations; and
- continually improve upon our systems to ensure better performance.

Our value of **Sustained Innovation** means we leverage our talents with ethical and sustainable material science to create breakthrough technologies. To do so, we partner only with ethical suppliers who uphold our standards and support sustainable material development as part of our Mission.

**Q**

Gerald saw a story in the news about one of our suppliers. It suggested that they may have been involved in unfair labor practices. Should he let someone know?

**A**

Yes. We hold our suppliers to the same high standards we follow, and if there is even a possibility of improper or illegal behavior, Gerald should report his concern so it can be appropriately investigated.



Our Sustainability Council works to ensure we are aware of, and comply with, current applicable environmental legislation, regulations, and requirements; and we develop, maintain, and continually improve our environmental, health, and safety management systems, including establishing and documenting corporate-wide greenhouse gas reduction goals and tracking emissions.

# We Are Connected to our Communities

We believe strong companies build strong communities, and strong communities build strong companies. We connect with our communities through charitable giving and encouraging employee volunteerism.

If we choose to engage in political activities as a way of connecting with the community, we must do so individually, on our own time, and be clear that we do not represent the Company.

We may not use Company resources, including time, property, equipment, or personnel for political activities. We may not pressure or attempt to influence other employees to support any candidate or cause, or to make a political contribution.

**Q**

Kathy's manager asked her to make a personal contribution to a political campaign of a candidate who is generally considered supportive of our business. She doesn't support the candidate but is worried if she doesn't agree to make the contribution, her manager won't be happy with her. What should Kathy do?

**A**

Political contributions are a personal decision. No one should encourage others to make contributions or otherwise support a candidate or cause, especially if that "encouragement" could be seen as required to remain in good standing at work. Kathy should speak with her Human Resources representative if she is unsure how to address this with her manager.



# Acting with Integrity and Building Trust with our Investors



# We Keep Accurate Records and Manage them Properly

Accurate reporting is critical to ensuring the integrity of our books and records, managing our Company efficiently, and building trust with our investors. In addition to our financial statements, a record can be anything that documents a business activity, decision, or transaction, such as timecards, expense reports, health and safety, or quality records.

We are each responsible to:

- maintain complete, accurate and timely books and records related to our areas of responsibility;
- securely store records in accordance with our local Record Retention policies, comply with retention schedules, and legal holds;
- follow all internal controls;
- cooperate fully with auditors (both internal and external); and
- promptly report any actual or suspected error in the records or violation of internal controls to the appropriate Company **Resource** listed in this Code.

Anyone who intentionally misrepresents or falsifies information in our books and records, or who assists others in doing so, has engaged in fraud. Fraudulent activity compromises the integrity of our financial reporting and creates serious consequences for our Company.

## Q

Mike's co-worker has committed to spending \$50,000 with a supplier for services in the next year. Since his spending authority is only \$30,000, he asked Mike to create two purchase orders for \$25,000 each so he could avoid asking for higher approval. Is that okay?

## A

No, this action would enable Mike's co-worker to violate important internal controls that are in place to ensure all transactions are properly authorized. Mike should explain this to his co-worker and discuss it with his manager to be sure it doesn't happen again.



# We Protect Company Assets

To succeed in our Mission, we need to use Company assets effectively and protect them from loss, damage, theft, waste, or misuse. This includes tangible assets such as our equipment, funds, products, vehicles, computers; and intangible assets such as our intellectual property (e.g. trademarks, patents, trade secrets, or ideas). Our intellectual property is what sets us apart from our competitors and must be used in compliance with our guidelines.

Limited personal use of assets such as telephones, computers and printers is generally allowed if it is consistent with Company policies and does not interfere with your work at the Company. Keep in mind that the Company has access to any information processed or stored on its devices and systems.

Protecting Company assets (data and devices, such as computer systems, portable electronic devices, phones, and other media) requires us to take special security steps to safeguard these assets from unauthorized access, use, disclosure, modification, or destruction.

Unauthorized activity, including but not limited to cyberattacks, can cause significant harm to our Company, including our ability to conduct business without interruption. Some of these security steps include physically securing our information assets, using strong credentials, taking appropriate precautions when accessing the network, installing only authorized software, and being alert for increasing cyberattacks (e.g. phishing and ransomware).

We are responsible to report any loss, damage, theft, waste, or misuse of Company assets to the appropriate Company **Resource** listed in this Code.

**Q**

Fred travels for work and takes along his laptop computer. On a recent trip he realized he had forgotten his charger and his battery was dead. He decided to use the public computer in the hotel's business center and unsecured public Wi-Fi to access and work on some company files. Is this okay?

**A**

No. Fred should only use approved, secured means to access company files or data. Using unsecured devices or internet services could expose the Company to viruses or unauthorized access.



# We Do Not Trade on Inside Information

During our work, we may have access to or come across information about our Company, our customers, or our suppliers that is not known to the public. "Inside information" is information that is not available to the public, is material to the business, and would likely be taken into consideration by an investor when deciding whether to buy or sell stock in the Company. Some examples include information about new products, innovation, merger or acquisition activity, undisclosed financial results, or changes in executive leadership.

We cannot buy or sell stock in any company if we have such inside information about the company. We also cannot tell anyone else to buy or sell stock because of this information. Trading on inside information is against the law and Company policy. It is important to avoid even the appearance of violating these rules. If you have questions about trading in Company stock or our Insider Trading policy, please contact the appropriate Company Resource listed in this Code.

**Q**

Mei-ling is on a team providing components for a new product our customer is preparing to launch. She knows from her work with this customer that the new product has the potential to be very popular. She mentions it to her friend over dinner and suggests it would be a good idea to buy stock in the Company before the new product launches. Is this okay?

**A**

No. The information Mei-ling has about our customer is inside information. It is illegal and a violation of our policy to trade or to "tip" someone else to trade based on that information.



# Resources



## Company Policies

More detailed information on topics addressed in this Code can be found in local Company policies. These policies can be found on your Company (YAGEO, KEMET, Pulse) intranet site. You may also contact your local Human Resources representative for more information on local policies.



## Key Contacts

If you have any questions about the content in this Code, or you would like to raise a concern, you may contact the following offices or individuals in person, by phone or email:

### COMPLIANCE

Chief Compliance Officer, YAGEO Group  
Tel: (+1) 864-228-4140  
Email: [SusanBarkal@kemet.com](mailto:SusanBarkal@kemet.com)

### LEGAL

Head of Legal Division, YAGEO Group  
Tel: +886.2.6629.9999 ext. 3602  
Email: [Jesse.Chen@yageo.com](mailto:Jesse.Chen@yageo.com)

Head of Legal Division, APAC  
Tel: +886 2 6629 9999 ext. 3537  
Email: [AndySun@pulseelectronics.com](mailto:AndySun@pulseelectronics.com)

Head of Legal Division, Japan and Korea  
Tel: +81 (0)3-3515-9194  
Email: [HiroshiOkubo@kemet.com](mailto:HiroshiOkubo@kemet.com)

Head of Legal Division, Americas and EMEA  
Tel: +1 954 766 2818  
Email: [CherylSwack@kemet.com](mailto:CherylSwack@kemet.com)

### FINANCE

Chief Financial Officer, YAGEO Group  
Tel: +8862.6629.9999 x 3968 (internal 811 3968)  
Email: [Eddie.Chen@yageo.com](mailto:Eddie.Chen@yageo.com)

Deputy Chief Financial Officer,  
YAGEO Group  
Tel: 954-595-5004  
Email: [MichaelRaynor@kemet.com](mailto:MichaelRaynor@kemet.com)

Head of Finance, Pulse Electronics Pte Ltd  
Tel: 65-69700375  
Email: [KahwaiFok@pulseelectronics.com](mailto:KahwaiFok@pulseelectronics.com)

### HUMAN RESOURCES

Chief Human Resources Officer, YAGEO Group  
Tel: +886.2.6629.9999 x 3958 (internal 811 3958)  
Email: [Alison.Tung@yageo.com](mailto:Alison.Tung@yageo.com)

### INTERNAL AUDIT

Head of Auditing, YAGEO Group  
Tel: +886.2.6629.9999 x 3292  
Email: [Alison.Hsieh@yageo.com](mailto:Alison.Hsieh@yageo.com)

### INFORMATION TECHNOLOGY

Chief Information Officer, YAGEO Group  
Tel: +886.2.6629.9999 x 3660 (internal 811 3660)  
Email: [ChrisYC.Yang@yageo.com](mailto:ChrisYC.Yang@yageo.com)

Deputy CIO, YAGEO Group  
Tel: +1 (954) 459-3133  
Email: [ChrisHall@kemet.com](mailto:ChrisHall@kemet.com)

Information Security & Compliance  
Email: [soc@yageo.com](mailto:soc@yageo.com)

COMMUNICATIONS (including Social Media)  
Email: [communications@yageo.com](mailto:communications@yageo.com)

## Ethics Hotline

The Ethics Hotline can be used to raise ethical concerns and/or report suspected violations of our Global Code of Conduct in a confidential and/or anonymous manner.

You may access the Ethics Hotline via the internet at

**[YAGEOGroupEthicsHotline.ethix360.com](http://YAGEOGroupEthicsHotline.ethix360.com)**  
or by telephone.

All other countries    Internet only



LOCATION	TELEPHONE NUMBER
Austria	+43 720 778 914
Bulgaria	0800 46 046
Canada	1 (833) 603-6004
China	400 120 0383
Czech Republic	800 700 739
Finland	+358 75 3255858
France	+33 9 70 0198 33
Germany	+49 32 221098271
Hungary	+36 21 211 1484
India	000 800 919 1264
Indonesia	007-803-321-2215
Italy	Internet only
Japan	0800-888-0165
Macedonia	0800 9 38 98
Mexico	800 681 8121
Portugal	+351 308 810 860
Singapore	+65 3158 4765
South Corea	070-4784-4357
Spain	+34 902 0186 88
Sweden	+46 77 676 62 00
Taiwan	00801-85-6740
Thailand	001-800-852-6255
United Kingdom	+44 330 808 7989
United States	1 (833) 603-6004
Vietnam (Viettel Network Subscribers)	122-80811
Vietnam (Mobifone Network Subscribers)	121-020161
Vietnam (Vinaphone & SPT Network Subscribers)	120-32-699

## Waivers of this Code

Any employee who believes a waiver of this Code is warranted must contact the Chief Compliance Officer. A waiver of this Code cannot be granted without the express approval of the Board of Directors following a review and recommendation by the Chief Compliance Officer. Any waiver of this Code must be promptly disclosed to shareholders.



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