



The TYCO ELECTRONICS GUIDE TO SUPPLIER SOCIAL RESPONSIBILITY

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The TYCO ELECTRONICS GUIDE TO SUPPLIER SOCIAL RESPONSIBILITY

Welcome to the Tyco Electronics Guide to Supplier Social Responsibility. In this document, we clarify for you, our Supplier, the values, principles and guidelines by which Tyco Electronics (“TE”) seeks to operate, in particular as they relate to social responsibility. Our goal is for our Suppliers to embrace these same socially important values, principles and guidelines. They track the values and principles communicated to and documented for our employees internally in the TE Guide to Ethical Conduct, which may be referenced at

<http://www.tycoelectronics.com/aboutus/ethicalConduct.asp>

Since the fundamental basis for TE’s operating principles is found in our core values, we begin by sharing those core values with you, below. We request that you also apply them in your daily business practices and operations.

TYCO ELECTRONICS’ CORE VALUES

Tyco Electronics’ commitment to the highest standards begins with ensuring that everyone across the TE organization and our Supply Chain understands and demonstrates our core values. These are the values that define how we conduct ourselves as Tyco Electronics employees and decision-makers at the individual, team, and company levels. We believe it is critical that our Suppliers understand, share, and apply our core values in their own operations and business interactions. The following four core values are the foundation of the Tyco Electronics internal Guide to Ethical Conduct and, as such, are also the foundation for our TE Guide to Supplier Social Responsibility.

Integrity

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, regulations and Company policies. We are dedicated to diversity, fair treatment, mutual respect and trust.

Accountability

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.

Teamwork

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 at all levels of the organization.

Innovation

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.

Tyco Electronics Principles and Guidelines for Supplier Social Responsibility

Our internal Tyco Electronics Guide to Ethical Conduct which contains our core values as defined above, in combination with policies and guidelines from the **Electronic Industry Code of Conduct** (please reference on the Internet www.eicc.info), are the foundation for the Tyco Electronics principles and guidelines for Supplier Social Responsibility contained in this Guide. This Guide to Supplier Social Responsibility is meant to provide our Suppliers with an understanding of TE's expectations for business conduct, decision-making and business interaction. It outlines key principles and behaviors, based on our core values, and emphasizes the principles and behaviors that we require of our Suppliers. We expect our Suppliers to embrace these principles and behaviors and seek to promote their use with their own employees and with their external business associates, customers and suppliers. Tyco Electronics also reserves the right to audit our Suppliers on issues of Social Responsibility.

Specific Guidelines for Integrated Suppliers and Temporary Personnel Resources working at TE via Staffing Services: Tyco Electronics utilizes "*Integrated Supplier Representatives*" to perform work for TE, both onsite at TE locations and remotely via telecommuting from their own companies' plant locations. Integrated Supplier Representatives are employees of our Suppliers who are present in Tyco Electronics facilities, and who are integrated into the TE workforce. These Integrated Suppliers perform specific TE work related to the commodities and products provided by that Supplier.

Also, TE utilizes external Suppliers of Human Resource Temporary Staffing services, which provide temporary labor to TE office and plant locations around the world, when and where needed by Tyco Electronics.

When resources from either of the two above categories of external personnel are engaged by Tyco Electronics to work in a similar capacity as TE employees and alongside TE employees, they must follow the values, principles, policies, standards, and guidelines stated in this Guide to Supplier Social Responsibility as well as in the TE Guide to Ethical Conduct, found at:

<http://www.tycoelectronics.com/aboutus/ethicalConduct.asp>

APPLICABILITY OF THIS GUIDE:

This Guide applies to all Suppliers of Tyco Electronics globally. The values, principles and guidelines stated in this Guide are demonstrated by Tyco Electronics in its day-to-day business operations.

LABOR, DIVERSITY, AND HUMAN RIGHTS

Providing Opportunity for All

Tyco Electronics extends equal opportunity and fair treatment to all of its employees. TE specifically prohibits discrimination on the basis of age, disability, ethnicity, marital or family status, national origin, race, color, religion, sex, sexual orientation, veteran status, or any other characteristic protected by law. TE is committed to providing a culture that values Diversity and team work with a conscious desire to achieve understanding, respect, inclusion, and continuous learning. We expect that all employees treat one another with respect and dignity.

We extend these same principles to the relationships throughout our Supply chain with our Suppliers and Customers. One of the included principles is the promotion and encouragement of Supplier Diversity within our Supply base.

Supplier Diversity: Diversity Suppliers are businesses owned by groups traditionally underrepresented in business, such as certain ethnic groups or women. The concept is labeled Supplier Diversity in the USA (and was formerly known as MWBE - Minority and Women-Owned Business Enterprises), and is a key business strategy for progressive corporations. In particular for businesses with operations in the USA, the concept of Supplier Diversity is a formalized program. The goal of Tyco Electronics' Supplier Diversity Program is to increase the number and variety of Diversity Suppliers with whom we do business. We are constantly engaged in expanding the integration of Diversity Suppliers into our Supply base, thus providing these businesses with an opportunity for growth. Just as equivalent types of internal decisions (such as employee hiring) are based on the individual applicant's qualifications and capabilities in conjunction with Equal Employment Opportunities (EEO), the qualifications and capabilities of our Suppliers are the primary basis for choosing them as business associates, in conjunction with our Diversity programs. We at Tyco Electronics are constantly seeking highly-qualified Diversity Suppliers for our Supply Base.

Human Rights: In addition to complying with Equal Employment Opportunities (EEO) laws in the United States of America, TE strives to comply with all other applicable civil rights, human rights, environmental and labor laws in the locations where the Company operates around the world. We expect our Suppliers to do the same.

We require Tyco Electronics business units and Suppliers to provide clean and safe working environments and conditions for employees, forbid child labor at our facilities or at the facilities of our Supplier subcontractors, and require that employees receive all benefits mandated by applicable laws. Regardless of location, TE prohibits our business units or Supplier associates from engaging in activities that do not maintain individual dignity and respect, even if permissible under applicable law. Our core values show commitment to being good global citizens and acting in a socially responsible manner in the communities where we live and work.

Tyco Electronics supports the following specific Labor and Human Rights related principles internally for TE, and for our Suppliers:

1) Freely Chosen Employment

Forced, bonded or indentured labor or involuntary prison labor is not to be used. All employment will be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to surrender government-issued identification, passports or work permits as a condition of employment, except for the purpose of legal status verification, in which case the documents must be promptly returned to the worker.

2) Child Labor Avoidance

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 should not perform hazardous work and may be restricted from night work with consideration given to educational needs.

3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Work weeks are not to exceed the maximum allowable hours set by local law. Further, a work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off per seven-day week.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

5) Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.

6) Non-Discrimination

Our Suppliers must be committed to a workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way as a condition of employment.

7) Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Our Suppliers must respect the rights of workers to associate freely, to join or not join labor unions, to seek representation, and to join workers’ councils in accordance with local laws. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

8) Metals Materials/Supplies from Conflict-Free Mines

Tyco Electronics expects that our Suppliers will take all commercially reasonable measures to supply metals materials/supplies from “conflict-free” mines. Suppliers should actively trace sources of metals materials/supplies commonly used in the electronics industry, including but not limited to gold (AU), tantalum (Ta), tungsten (W), tin (SN), cobalt (Co) and copper (Cu), to ensure metals supplied are not “conflict” metals. Tyco Electronics reserves the right to request declarations from our Suppliers verifying that metals supplied to us are from conflict-free sources and listing the metal sources for traceability (including metal supplier, metal mine name and location). Note that “conflict” metals are those sourced from mines in conflict areas controlled by either non-government military groups or unlawful military factions, including but not limited to the Eastern region of Democratic Republic of Congo (DRC).

HEALTH AND SAFETY

Making Workplace Safety and Security a Priority

Having a safe workplace is one of the most important benefits we offer to our employees and their families. We are committed to providing a safe working environment for all employees. We do this by following strict safety and security rules and practices, which we expect our Suppliers also to follow, including the ones listed below:

- Requiring employees to take an active role in working safely by adhering to safety procedures, and taking reasonable care of Company assets and equipment in accordance with TE's Use of Company Property Policy.
- Prohibiting the possession of weapons and other dangerous devices by employees, contractors, Suppliers, and visitors at all times on the Company's, Customers', or Suppliers' property, including parking lots and Company-owned vehicles.

While compliance with all applicable laws, regulations, and record-keeping requirements is mandatory, TE seeks to exceed the minimum legal standards. It is our goal to be recognized as an industry leader in safety, and we expect our Suppliers to work with us to achieve that goal.

Tyco Electronics supports the following Health and Safety principles and practices internally, and by our Suppliers:

1) Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicle, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns.

2) Emergency Preparedness

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

3) Occupational Injury and Illness

Procedures and systems are to be in place to manage, track and report occupational injury and illness.

4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.

5) Physically Demanding Work

Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

6) Machine Safeguarding

Physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers.

7) Dormitory and Canteen

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by Suppliers or a labor agent are to be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

SUBSTANCE-FREE WORKPLACE for the Well-Being of All Employees and Visitors:

Substance abuse, whether alcohol or drug abuse, poses a serious threat to the safety, health, and productivity of our organization, employees, and customers. TE has a substance-free workplace policy that extends to locations worldwide and applies to our employees, Suppliers, customers, and visitors.

Our substance-free workplace policy prohibits:

- Using, selling or possessing illegal drugs or other controlled substances in the workplace. Possession of prescription medication for personal medical treatment in accordance with physician's orders is permitted;
- Using or possessing alcohol in the workplace, unless specifically approved by both the highest-ranking management employee and the human resource manager at a particular location; and
- Being under the influence of alcohol, illegal drugs or any other controlled substance on the job.

Our Suppliers should adopt policies similar to those above for their own locations.

ENVIRONMENTAL CONCERNS

Environmental responsibility is critical to being a world-class organization and producing world-class products. Tyco Electronics supports the following Environmental principles internally and for our Suppliers:

1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring) and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

2) Pollution Prevention and Resource Reduction

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3) Hazardous Substances

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal. Tyco Electronics expects our Suppliers to comply with Environmental Requirements for the Elimination of Hazardous Substances, as in the various evolving global RoHS (Restriction of Hazardous Substance) regulations, and as required per the Tyco Electronics Product Environmental Compliance Specification TEC-138-702 (Supplier Requirements for Product Environmental Compliance).

4) Wastewater and Solid Waste

Wastewater, e-waste and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

6) Product Content Restrictions

Suppliers to Tyco Electronics must adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal. This includes adhering to processes to comply with each agreed-upon customer-specific restricted and hazardous materials list. Suppliers must also adhere to all regulations concerning radioactive substances in metals.

Specifically, regarding stainless steel or other nickel bearing alloy contamination of Cobalt 60, it is our expectation that Suppliers routinely test and audit their supply chain for potential radioactive contamination. Tyco Electronics reserves the right to request verifications from Suppliers detailing their ongoing testing and auditing of supply base to ensure compliance with all regulations and customer-specific requirements. Again, Tyco Electronics expects our Suppliers to comply with Environmental Requirements for the Elimination of Hazardous Substances, as in the various evolving global RoHS (Restriction of Hazardous Substance) regulations, and as required per the Tyco Electronics Product Environmental Compliance Specification TEC-138-702 (Supplier Requirements for Product Environmental Compliance).

ETHICS

To meet social responsibilities, TE Suppliers must meet the highest standards of ethics. Tyco Electronics supports the following principles internally, and we expect our Suppliers to abide by these same standards:

1) Business Integrity

The highest standards of integrity are to be expected in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited and may result in immediate termination and legal actions.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

3) Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

4) Intellectual Property

Intellectual property rights are to be respected; transfer of technology and knowledge is to be done in a manner that protects intellectual property rights.

5) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Means to safeguard customer information should be available.

6) Protection of Identity

Programs that ensure the protection of Supplier and employee “whistleblower” (employees who report regulatory violations) confidentiality are to be maintained.

7) Community Engagement

Community engagement is encouraged to help foster social and economic development.

GIFTS AND ENTERTAINMENT: Appropriate Giving and Receiving:

Tyco Electronics’ business decisions with our Suppliers are based on performance factors such as price, quality, delivery, service, and reliability. It is inadvisable for TE employees to accept any gifts or offers from, or give any gifts or offers to, anyone with whom TE does business. If the gift or offer is of significant value, accepting it can create the appearance of a conflict of interest. It could be suggested or inferred that the gift-giver might receive favorable or preferential treatment, such as purchase orders with better prices, terms or conditions of sale. This policy extends to our Suppliers, distributors and customers, as well as entities or individuals currently doing or seeking to do business with any TE entity.

Generally, acceptable gifts are:

- Infrequent, non-cash and not excessive in value; and
- Small enough so that Tyco Electronics or a Supplier are not embarrassed to discuss them or reveal them publicly.

Gifts, entertainment, and meals provided to U.S. or foreign government officials and employees must always be legal, reasonable, and never for the purpose of improperly influencing an official decision. TE Employees are required to comply with Company policies concerning giving any gift, entertainment or meal to government officials, employees or their immediate family, and those policies apply to our Suppliers' activities.

BRIBES:

While TE is careful about the companies it does business with, there's always a risk that an individual may try to "buy favor." Any bribe or improper payment is prohibited. In addition to cash payments, bribes include:

- Kickbacks or kickback schemes;
- Unexplained rebates; or
- Payments for disguised allowances or expenses.

BUSINESS ENTERTAINMENT:

It is important that relationships with Suppliers, customers, and other parties be based on lawful, efficient and fair business practices. Reasonable business entertainment that is in the best interest of the Company is allowed. Such entertainment must always be conducted in an appropriate and lawful manner and should comply with appropriate TE policies regarding expense reimbursement.

FRAUD: Know How to Identify and Avoid It

Fraud, or the act or intent to cheat, trick, steal, deceive, or lie... is both dishonest and, in many cases, criminal. Intentional acts of fraud by TE employees are subject to strict disciplinary action, including termination of employment, and possible civil and/or criminal action. Our Suppliers must understand this policy with regard to their dealings and interactions with Tyco Electronics employees in Procurement, Engineering or any function.

It is important to understand what fraud can entail in order to be able to recognize it and avoid mistakes. Examples include, but are not limited to, the following:

- Forging or altering checks;
- Misappropriating assets or misusing Company property;
- Unauthorized handling of transactions;
- Making an entry on records or financial statements that is not accurate and in accordance with proper accounting standards.

ANTITRUST: Encouraging Healthy Competition

Antitrust and competition laws are designed to ensure that competition remains vigorous and free from collusion, with the intended results being an efficient and productive global economy. Antitrust issues are very complex and apply to both domestic and international commerce. Employees working in Procurement, Marketing, Sales or Acquisitions need to be especially aware of antitrust, competition and trade regulation requirements. This also applies to those who participate in trade associations or industry standard setting groups. Our Suppliers must understand and comply with antitrust requirements.

Regarding Antitrust and competition, determining what actions are improper often depends on the structure of the market and a number of other factors. To avoid even the perception of unlawful conduct, TE employees and TE Suppliers must avoid:

- Discussing with a TE competitor prices, costs, production, products and services, bidding practices, other non-public business matters or terms of sale, sales territories, distribution channels or customers;
- Disparaging or misrepresenting a competitor or any competitors' products.

In addition, the following practices should not be engaged in without prior review by the TE Legal Department:

- Conditioning the purchase, sale or lease of a product or service on a reciprocal agreement with a customer or Supplier;
- Entering into an exclusive dealing arrangement with a customer, distributor, or Supplier;

CONFLICTS OF INTEREST:

Every day, TE employees work with Suppliers, customers, consumers, and others who do business directly and indirectly with TE. It is important that each business decision, and any related action, be based on the best interests and needs of the Company, and not on personal interests or relationships. It is critical for our Suppliers to understand our policy on conflict of interest. It is essential that we avoid even the appearance of conflicts of personal interest and those of the Company.

For purposes of this policy, a conflict of interest is any outside interest that conflicts with the purpose, policies or operations of TE. Even the appearance of a conflict is what a reasonable person might view as a potential conflict and represents risk. Conflicts apply equally to business relationships and personal activities.

TE expects its employees and our Suppliers to identify and prevent any such situations where there is an actual conflict of interest, or even the appearance of a conflict of interest.

OTHER BUSINESS OR FINANCIAL INTERESTS:

Financial Interests: If a TE employee or immediate family member, or any person living with a TE employee, has a significant financial interest in a TE Supplier, customer, distributor, consultant, or competitor, the employee must immediately notify the local TE Human Resources representative or Legal Department.

Involvement in Other Organizations: If a TE employee serves as a director, officer, employee, agent, or consultant with any organization that does business with TE (including a Supplier), that employee must notify the local TE Human Resources representative. Prior to accepting a new position with such an organization, the employee must timely notify and receive written approval from the local TE Human Resources representative. This policy includes volunteer positions (e.g., positions that are unpaid).

DOING BUSINESS WITH GOVERNMENTS: Know what is appropriate:

The sale of goods and services to many governments is heavily regulated. TE Employees must adhere to the highest standards of integrity and honesty and avoid even the appearance of impropriety. TE Suppliers must similarly comply.

TE employees and our Suppliers who are involved in transactions with governmental customers must take the necessary steps to ensure that all government-related transactions and relationships comply with applicable laws and regulations, including the completion of all required records.

FOREIGN CORRUPT PRACTICES ACT: Tyco Electronics expects our Suppliers to strictly abide by the regulations of the USA Foreign Corrupt Practices Act (FCPA) which applies to our global business and all local laws governing payments to government officials. TE complies with the FCPA and the anti-corruption treaties and laws of the countries in which it does business. The FCPA prohibits employees from bribing any public official, government, or other individual, regardless of nationality or local custom, to secure or maintain any concession, contract, or favorable treatment for TE or the employee. Bribes include any kickbacks, excessive gift giving, entertainment or meal expenditures or other unlawful payments. TE employees will not directly or indirectly make or offer to make a corrupt payment to government officials, including employees of state-owned enterprises. The FCPA also contains strict financial reporting requirements.

EXPORT/IMPORT CONTROLS: Growing our global business in a complex world of regulations:

Most countries, including the United States, have export/import control laws in place to protect strategically necessary products and technologies (this includes, but is not limited to, production materials, finished goods, capital equipment, molds and tooling, samples and prototypes, repaired or returned products, and technical information). When importing or exporting products, services, information or technology, TE complies with applicable United States and other national laws, regulations and restrictions worldwide.

It is important to understand that, with few exceptions, U.S. origin products and/or technology are subject to U.S. export controls no matter where they are located in the world. The United States controls the export of defense articles and certain commercial items that have both commercial and military applications.

As our Supplier, you are required to exercise due diligence to ensure that proper import/export related policies, procedures and controls are adopted within your organization. Failure to do so could expose TE, along with our customers and Suppliers, to increased scrutiny from government agencies and associated negative publicity. Tyco Electronics' ability to conduct business on a global basis must not be jeopardized.

In addition to United States export and import control regulations, countries around the world have their own regulations pertaining to exports and imports. TE's policies on export/import controls and economic sanctions related to Suppliers contain specific guidelines regarding:

- Obtaining proper export and import authorization;
- Disclosing or transferring technical data to foreign nationals either in the U.S. or abroad
- Establishing eligibility of export/import recipients;
- Executing, controlling, and delivering required documentation; and
- Retaining records for the above.

If your Company, as a Supplier to TE, wants to know TE's specific guidelines on this issue, please contact your local TE Purchasing Management.

PROPRIETARY and CONFIDENTIAL INFORMATION: Protecting the Company's Knowledge

TE's Proprietary and Confidential Information (defined as business and technical information that is not generally or publicly known by others) is very valuable because it provides TE, and our Supply Chain, with a competitive market advantage.

TE Suppliers must protect and respect Tyco Electronics' proprietary and confidential information by maintaining strict confidentiality of information provided to them by TE, or to which they are circumstantially exposed as a result of their business interactions with TE, by not sharing that information outside of their company, nor inside their company with anyone who does not need to know about it as part of their job. Such information is the sole property of TE. Examples of confidential and proprietary information include, but are not limited to:

- TE Intellectual property – such as Engineering/ Production drawings for potential new products as well as non-public drawings for current products, such as manufacturing drawings;
- TE Specifications, and information such as trade secrets, invention disclosures, and un-filed patent applications;
- Agreements between Tyco Electronics and its Suppliers, agents, strategic partners and/or other third parties;
- TE Company financial information including all non-public sales information;
- TE Proprietary software or Company-owned software modifications, templates, worksheets, or other programs;
- TE Financial, business, technical and other information about potential acquisitions and/or divestitures;
- TE Business information such as plant layouts, financial forecasts, organizational charts, organizational announcements, staffing changes, business updates or product news and product roadmaps that are not publicly available; or
- TE Customer lists and agreements, market share data, supplier agreements, Purchase Order data to Suppliers, and other similar confidential information.

E-MAIL, the INTERNET, and the USE of COMPANY Property: Limiting Use to Business Purposes

All communications data and information sent or received using Tyco Electronics Company equipment or assets are TE property and are not private communications. TE owns and/or controls access to all communications equipment, including computers, telephones, software, email, instant messaging, text messaging, voice mail, conferencing equipment, company cell phones, handheld devices, and office supplies. TE reserves the right to monitor all communications, including Internet usage.

Tyco Electronics' property, including but not limited to, its buildings, parking lots, vehicles, equipment, production scrap materials and supplies, exists to enable employees to perform their business-related duties, including interacting and transacting business with our Supplier base. The use of Company property is for the sole purpose of conducting business-related tasks.

This policy extends to our Suppliers in the use of such communications devices as listed above and including all communications methods with Tyco Electronics, such as E-Mail, the Internet, or any TE-owned software or TE-owned property that our Suppliers use.

- Communications between Tyco Electronics and our Suppliers via E-Mail and Internet, as well as any other forms of communication, must not violate this Guide or other TE policy, particularly the sections related to conflicts of interest and/or disclosure of TE confidential information.

- Communications between Tyco Electronics and our Suppliers also must not ever include forwarding of chain letters, mass emails for non-business purposes, or selling items or services for personal gain.
- Communications between Tyco Electronics and our Suppliers also must never contain pornographic or offensive material, discriminatory or harassing language or derogatory references to age, disability, ethnicity, marital or family status, national origin, color, religion, sex, sexual orientation, veteran status, or any other characteristic protected by law.

MANAGEMENT SYSTEMS

Suppliers to Tyco Electronics shall adopt or establish a management system designed to track: (a) Compliance with applicable laws, regulations and customer (including TE) requirements related to the Supplier's operations and products; (b) conformance with the principles stated in this document; and (c) identification and mitigation of operational risks. The management system embraced by Supplier should also facilitate continual improvement.

The management system as implemented by our Suppliers should contain the following elements:

1) Company Commitment

Corporate social and environmental responsibility statements affirming commitment to compliance and continual improvement.

2) Management Accountability and Responsibility

Clearly identified company representatives/employees responsible for tracking implementation and conducting periodic review of the status of the management systems.

3) Legal and Customer Requirements

Identification, monitoring and understanding of applicable laws, regulations and customer requirements.

4) Risk Assessment and Risk Management

Process to identify the environmental, health and safety (areas to be included in a risk assessment for health and safety are warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities/bathrooms, kitchen/cafeteria and worker housing /dormitories) and labor practice risks associated with company operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to ensure regulatory compliance to control the identified risks.

5) Performance Objectives with Implementation Plan and Measures

Written standards, performance objectives, targets and implementation plans including a periodic assessment of company performance against those standards, objectives, and plans.

6) Training

Programs for training managers and workers to implement policies, procedures and improvement objectives.

7) Communication

Process for communicating clear and accurate information about company performance, practices and expectations to workers, Suppliers and customers.

8) Worker Feedback and Participation

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Supplier Guide and to foster continuous improvement.

9) Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the principles and guidelines outlined in this Guide, and contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) Documentation and Records

Creation of documents and records to ensure regulatory compliance and conformity to Company requirements along with appropriate confidentiality to protect privacy.

RECORD-KEEPING and FINANCIAL CONTROLS: The Information by which we are measured

Accurate, timely, complete financial records provide the key information necessary to manage our businesses. These records and financial controls also are essential to fulfilling obligations to shareholders, governments and the general public at large. We expect our Suppliers to follow the same procedures and commitment to financial responsibility as does TE, including creating and retaining adequate records. In general, all internal and external financial records and information must follow:

- U.S.A. generally accepted accounting principles (GAAP);
- Effective internal financial controls, including procedures to protect assets.

Communicating Accurate, Timely Information

In all interactions and communications – between TE and our Suppliers, customers, distributors, governmental agencies, or others inside or outside of the Company -- TE employees are expected to be truthful and forthright, and we expect the same of our external Suppliers. This includes:

- Making accurate statements without misrepresentation, omissions, or statements intended to mislead or misinform; and
- Responding promptly, accurately, and with full disclosure to requests from governmental agencies for information or documents.

SUPPLIER CONCERNS

As our Supplier business associate, your role includes understanding Tyco Electronics' values and principles, including all regulations that apply equally to your company and its interaction with TE. If you become aware of any ethical, legal, environmental, or compliance issues about which you have concern, you have a responsibility to bring them forward to us.

To raise a concern you can call Tyco Electronics' confidential, toll-free ConcernLINE at the appropriate number found at the link below.

CONCERNLINE TOLL-FREE CALLING Instructions:

<http://www.tycoelectronics.com/aboutus/concernline.pdf>

ConcernLINE is available seven days a week, 24 hours a day and is staffed by trained professionals. Translators also are available. If you do not speak English or prefer to have an interpreter assist you in speaking with the ConcernLINE specialist, immediately tell the specialist which language you speak. The specialist will then begin conferencing in an interpreter. As this happens, you will hear music and you should remain on the line. You will then hear a recorded message in your language confirming that an interpreter will come on line shortly. An interpreter will then join your conversation to assist you and the specialist in completing the call.

Ombudsman:

In addition to the ConcernLINE, we have established an Ombudsman, a Tyco Electronics employee, who is an independent, impartial, and a totally confidential resource for our employees, Suppliers, investors and customers to raise and address concerns. The primary function of this office is to ensure that all compliance issues, raised through any of the channels offered to you in this Guide, are resolved quickly, fairly, and at the proper level in the organization. Contact information for the Office of the Ombudsman may be found at the link below:

<http://www.tycoelectronics.com/aboutus/ombudsman.asp>