

2022 ———•

Code of Conduct & Business Ethics



**Electrical Components
International**

COMMITTED TO ETHICAL EXCELLENCE



A message from...

Mike Balsei

Chief Executive Officer

Over the past few years, ECI has grown and expanded tremendously. As we move into our next chapter together, I believe it is crucial to take a moment to think about what ECI stands for as a company.

Above all else, ECI values safety, integrity, empathy, and accountability. While customer satisfaction, along with business growth and performance, are certainly priorities, no business result is ever worth compromising the well-being of our employees or our ethical standards. These values are more than just words on a page; they are how we live. ECI operates under three guiding principles:

- **We work hard to ensure that our employees return home, safe and healthy, to their families every day.**
- **We do the right thing, even when it's difficult.**
- **We communicate with each other, our customers, and our stakeholders with honesty and transparency.**

This Code of Conduct and Business Ethics is designed to ground us, guide us, and unite us in upholding these core values. It is meant to be a tool that will support your day-to-day decision-making, not a legalistic document that you glance at once a year and never think of again. Inside you will find discussions about how our values apply to our everyday work. You'll also find contact information to share concerns and a framework for making sound decisions.

At ECI, we are all one team and our compliance and ethics efforts require us all to lead by example. Please follow this Code and its principles in all that you do for ECI. Ask questions when you have them and speak up if you see a problem. Together we can continue to build an ECI that not only engineers and manufactures superior products for our customers but is also a special place to work.

Sincerely,

Mike Balsei

CEO

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Our Code – Staying Grounded

Our Code is designed to ground us and to unite us in upholding ECI's core values. No matter your title, job responsibilities, or location, if you are an ECI employee, we need and expect you to embody our Code and we are committed to helping you do so.

Our Code serves as a reference guide, a tool that can support your day-to-day decision making. We cannot possibly cover within this document all of the circumstances that you may encounter as an employee of ECI. Instead, we have developed this Code to serve as an outline for how ECI's core values apply to various organizational activities and to provide a framework for making sound decisions. If you find yourself in a tough situation, please ask for help. Our Leadership Team is always here to explain our policies and help you navigate challenging issues.

Our Code applies to all ECI employees, officers, and directors. This includes all employees, officers, and directors of ECI's subsidiaries and controlled affiliates. All third parties and individuals and entities working on behalf of ECI are also expected to know and comply with the Code.

Doing Your Part – Our Employees' Responsibilities

We cannot conduct business ethically without you. Each employee is responsible for doing their part to help ECI operate honestly and ethically, and in a manner that promotes the best interests of the Company.

All ECI Employees have three fundamental responsibilities:

- 1 Stay Informed:** Understand and be able to apply the Code and all policies, laws, or regulations to the risks that you encounter as a result of your job responsibilities.
- 2 Err on the Side of Caution:** If something seems close to the ethical line, don't do it. If you are confused or don't understand an issue, ask for help.
- 3 Speak Up:** If you see a problem, tell us about it and keep telling us about it until you are comfortable that the issue has been resolved. More details on how to speak up are provided below.

Doing Your Part – Our Leaders' Responsibilities

If you are a manager, you not only have to do your part, you must also help your team do theirs.

All ECI Leaders have three fundamental responsibilities:

- 1 Lead By Example:** As far as your team is concerned, you are the voice of ECI. Consider the example you set and always model ECI values.
- 2 Create a Culture of Integrity and Respect:** You are responsible for creating an environment where employees understand their responsibilities and feel comfortable speaking up without fear of retaliation. Proactively communicate the importance of ethics and compliance and make sure that your team knows they can always come to you, even if they are bringing bad news.
- 3 Hold Your Team Accountable:** Reinforce that no objective is ever worth compromising our integrity and hold the people who report to you accountable for following our values.

ECI's Guide to Making Ethical Decisions



Step 1: Pause

No Code or policy can address every circumstance you might encounter at work. If you find yourself in a situation where you don't know what the right decision is, **PAUSE**.



Step 2: Question

The following **QUESTIONS** will help you determine whether taking a particular action is the right thing to do.

- Does this action feel right?
- Is taking this action legal and consistent with ECI's values, Code, and policies?
- Are you confident that taking this action is in the best interest of our Company and its customers, suppliers, employees, and the community?
- Would you be comfortable with your friends and family knowing about your decision?
- If this decision becomes public, would you stand by your choice?



Step 3: Stop or Go

GO: If you answered "yes" to all of these questions, then moving forward is probably okay. However, if you're still concerned, it never hurts to ask for help.

STOP: If you answered any of these questions with "no," "I don't know," or even "maybe" – you should STOP. Do not move forward until you ask for additional help and guidance from your manager or the Legal Department.



Warning Bells

If you hear anyone having a questionable conversation about a business decision, it is likely time to PAUSE. Be alert for comments like:

- "Don't worry about it, no one is going to know."
- "Our competitors do it this way."
- "We need to hit our business goals, no matter what."
- "That's how business is done here."
- "We've always done it this way, it hasn't been a problem."
- "I don't really have a choice. I've been told to get it done."
- "This is above my pay grade. I'll let my manager figure it out."

How to Share Concerns

Our management team works hard to stay informed about things that are happening in the workplace at our job sites and locations across the Company, but given the size and geographic scope of our business, this is only possible with your help. You are in the best position to tell us what is truly happening within ECI. You may be the only one to witness a colleague being harassed by a coworker, for example. Or you might be the first to notice a safety concern.

It takes courage to speak up, and it might be easier to assume that an issue is someone else's problem or that someone else will step up to stop bad behavior. But don't be tempted to look away. Reporting a potential issue can not only make ECI a better place to work, but also might help protect our financial position, corporate reputation, and all of our jobs. We are committed to supporting those who come forward and ensuring that they are protected from retaliation.



Reporting Concerns

If you need to make a report, there are several ways to do so. Please choose whichever option you are most comfortable using. Whichever option you choose, we will always respect your confidentiality.

Your options include:

- Speaking to a responsible supervisor, including your immediate supervisor, department heads or local managers
- Contacting your local Human Resources representative or compliance officer
- **Using ECI's Ethics Helpline:**
See details below on contacting and using the ECI Ethics Helpline

Using the ECI Ethics Helpline

ECI's Ethics Helpline is available to ECI employees, customers, suppliers, and others. The hotline can be used to report suspected violations of our Code, to report other ethics or compliance issues, or simply to ask questions. It is run by an independent third party and is available 24 hours a day, 365 days a year. Reports to the Ethics Helpline may be made anonymously if desired.

Website: eciethicshelpline.com

Toll-Free Calls:

US: 800-461-9330

Poland: 00-800-111-3819

Mexico: 800-681-6945

Spain: 900-905460

China: +400-120-3062

Morocco: +212-52-4-85014

Numbers for additional countries and further instructions are available at eciethicshelpline.com

No Tolerance for Retaliation

Employees sometimes worry that they will be retaliated against if they raise a concern. The Company has a strong policy against allowing anyone to suffer any sort of retaliation for reporting a potential problem, and we promise that we will protect all employees from any retaliation or retribution for raising a genuine concern. We also commit to continuing to create a culture where speaking up is encouraged and employees are celebrated for doing so, not punished.

A Commitment to Investigate

ECI will investigate all reports of questionable or unethical behavior. Whenever we conclude that improper behavior has occurred, we will take appropriate action, up to and including termination of the relevant employees.



How Leaders Should Respond

If you are a leader and someone approaches you with a concern, you have a special responsibility to listen and act. Appropriately handling the situation is an essential part of resolving issues and building trust. Always:

Listen Carefully: Remember that the person you are talking with has done something difficult and important. Thank them for upholding ECI's values and for helping to create a better company.

Respond Respectfully: Take every concern seriously, even if you disagree or have questions about the reporter's motives. Make sure the employee knows you are committed to addressing the issue.

Protect Confidentiality: Avoid discussing the report with others and only share details on a need-to-know basis.

Escalate the Issue: Ensure that the issue is escalated to the proper department so that it can be addressed appropriately.

Putting Our People First

The well-being of our employees is critical to our success. ECI should be a place where our employees feel safe, are free from harassment and discrimination, and are treated with respect and dignity.

Ensuring Respect and Dignity

OUR COMMITMENT

We treat all people with respect and dignity and will not tolerate discrimination or harassment in our workplace. This includes bullying, sexual harassment, threats, name-calling, negative stereotyping, unwelcome physical conduct, offensive gestures, or other behaviors that might create a negative work environment.

DOING YOUR PART

- Always treat others with respect and dignity.
- Do not unfairly consider anyone's personal characteristics when making business decisions.
- If a colleague approaches you informally about bullying, discrimination, harassment, or other inappropriate behavior, take them seriously, and ensure that you maintain their confidentiality. If you are unsure of how to help, speak with your supervisor, Human Resources, or the Legal Department. If you are approached in your capacity as an ECI leader or if you have other reasons to believe that the individual was attempting to make an official report, ensure that you escalate the issue appropriately.



FUNDAMENTAL RESPONSIBILITY ALERT!

If you witness or learn about discrimination, bullying, or harassment, let us know!



Promoting Diversity and Inclusion

OUR COMMITMENT

We strive to create a diverse and inclusive workplace. We will not discriminate based on any legally protected status.

DOING YOUR PART

- Give everyone a fair chance.
- Base all employment-related decisions on merit alone.
- Take a proactive stance against bias in the workplace by promoting a positive work environment and relationships where people feel like they are heard, welcomed, and valued.

Protecting Our Employees

OUR COMMITMENT

We never compromise safety to meet business objectives. We strive to adhere to the highest levels of health and safety standards and make every effort to maintain safe and healthy working conditions.

DOING YOUR PART

- Take reasonable care of your own safety at work and consider the safety of those around you.
- Follow all safety policies and protocols.
- Never come to work under the influence of drugs or alcohol and do not possess, distribute, or use any controlled substances while at work.



FUNDAMENTAL RESPONSIBILITY ALERT!

It is particularly important to immediately report health and safety concerns to your supervisor. Additionally, if you are a manager, you must escalate all health and safety issues and ensure that appropriate corrective and preventative actions are taken.

Conducting Business Ethically and Legally

Preventing Bribery and Corruption

OUR COMMITMENT

We act ethically and comply with all applicable laws and regulations wherever we do business, even when doing so might be more time consuming, expensive, or could cost us business. We prohibit and seek to prevent corrupt business practices, including bribery, extortion, fraud, and other unlawful payments and conduct.

DOING YOUR PART

- Remember, bribes can be anything of value not just cash!
- Never offer, accept, or give money or anything else of value to someone in exchange for influencing any sort of business decision or securing any type of business advantage for ECI.
- Never do anything through a third party that you are not authorized to do yourself.

Handling Business Courtesies Appropriately

OUR COMMITMENT

We recognize that exchanging gifts and hospitality may be appropriate in some professional situations but we must ensure that these types of business courtesies do not create a conflict of interest, serve as a bribe, or otherwise violate the law or our Code.

DOING YOUR PART

- Never use gifts, entertainment, or other business courtesies to influence an individual or company's business decisions.
- Do not offer or accept any gifts, entertainment, or other business courtesies where doing so could compromise or be reasonably seen to compromise the receiver's judgment, integrity, or impartiality.
- Follow all company policies and procedures relating to gifts, entertainment, and other business courtesies including applicable spending limitations.
- Keep accurate records of all business courtesies you give or receive.



FUNDAMENTAL RESPONSIBILITY ALERT!

Anti-Corruption Laws

We are subject to laws governing both public and commercial bribery in many of the countries where we operate. Additionally, as a U.S. company, we are subject to the U.S. Foreign Corrupt Practices Act (FCPA) no matter where we are doing business. In general, anti-corruption laws prohibit offering or exchanging anything of value for the purpose of improperly influencing a business decision or to obtain a business advantage. Bribes can include cash, gift cards, entertainment, inappropriate discounts, hiring a family member of someone you seek to influence, making charitable contributions, or providing someone with a "favor" in order to influence a decision.

Preventing bribery is a key responsibility that applies to all of us. When in doubt, STOP. If you are concerned about a decision or suspicious about something, contact the Legal Department.

Giving Cautiously

OUR COMMITMENT

We use integrity and caution when contributing to charitable and political causes. We will not use charitable donations or political contributions as bribes or to otherwise promote business activities.

DOING YOUR PART

- Never use ECI resources for charitable giving purposes without first obtaining permission from ECI's General Counsel.
- Do not use ECI assets, including ECI services or facilities, to make political contributions and do not make any kind of political donation in the name of ECI or represent your personal political opinions as the political opinions of ECI.
- Never ask a supplier or vendor to make a donation or political contribution of any kind in exchange for doing business with ECI.
- Do not represent your personal political opinions as the political opinions of ECI, and do not pressure other employees to join in any political effort.

Respecting Global Trade Controls

OUR COMMITMENT

As a global company, we are subject to a number of trade compliance laws. We respect and comply with all applicable export and import controls, money laundering regulations, customs laws, international sanctions regimes, and other relevant laws in the countries where we operate.

DOING YOUR PART

- If it is relevant to your job, make sure you understand and comply with the current rules and regulations affecting the inbound or outbound sale or shipment of goods in the countries in which we operate.
- Make sure any information you provide to customs, tax, or other government officials is accurate, complete, and truthful.
- Follow all relevant ECI policies and procedures when onboarding new vendors or customers.
- Contact our Legal Department before selling or shipping products to or doing business in any country where ECI does not currently do business.



FUNDAMENTAL RESPONSIBILITY ALERT!

Export Controls and Economic Sanctions

Export controls and economic sanctions prohibit or restrict ECI from doing business in certain countries or with certain individuals or entities. Trade sanctions laws are complex, vary widely around the world, and may apply even if a company does not know it is dealing with a sanctioned individual or entity. Additionally, determining what global trade laws apply to a particular transaction can be complicated and often more than one law may apply.

Always follow ECI policies and procedures to ensure that any transaction you are involved with does not involve restricted or sanctioned individuals, entities, regions, or countries. Failing to do so can seriously impact our business and reputation, can lead to significant fines, and can even result in the loss of our export privileges.

If you have questions about the laws that apply to your work or responsibilities or if you have any concerns about a potential trade sanctions violation please contact the Legal Department.

Protecting ECI's Information and Assets

Avoiding Conflicts of Interest

OUR COMMITMENT

To uphold our reputation as a trusted business partner, we avoid conflicts of interest and disclose any situations that could create even the appearance of a conflict. A conflict of interest can arise when an employee's personal interests, including the interests of the employee's family members, do not align with what is best for ECI. We prevent such conflicts where possible and address them promptly if they arise.

DOING YOUR PART

- Maintain a clear dividing line between work and home. If you, your close friends, or your family work for, or have any sort of business relationship with or investment in, any of our suppliers, customers, or competitors, inform your supervisor and the Legal Department.
- Don't allow your personal interests or relationships, including business activities and familial obligations, to put you in a position where your personal wants and needs might influence or appear to influence your business decisions or actions.
- Disclose any potential or actual conflict of interest to your supervisor or the Legal Department.
- Do not use ECI's confidential business information for your own personal gain. Use caution when investing in, or otherwise having a personal interest or business relationship with, any company that has a potential or actual business relationship with ECI and do not use family members to make investments or create relationships that would be problematic if you were directly involved.



Potential conflicts of interest can occur when you take actions or have interests that make it difficult to perform your work objectively or effectively or when you or a member of your family might receive improper personal benefits as a result of your position at ECI. Common situations that involve potential conflicts of interest include:

- Having a spouse that works in the Sales Department of one of our suppliers. In such a situation, you may be inclined to steer business towards your spouse rather than to other suppliers, particularly if your spouse receives monetary compensation based on their sales.
- Having a romantic relationship with the owner of one of ECI's customers. This is potentially problematic because you might be inclined to make decisions that would benefit the customer, rather than ECI.
- Accepting valuable gifts or entertainment from a supplier of the company. This could cause you to favor that supplier without a justifiable reason for doing so.



Respecting ECI Property

OUR COMMITMENT

We expect all employees to use company resources wisely, carefully, and only for ECI business. We value our intellectual property and will vigorously defend our intellectual property rights and also respect the rights of others.

DOING YOUR PART

- Only use ECI equipment, facilities, and resources to do work for ECI and don't remove equipment from our worksites without permission.
- Work to prevent the loss, misuse, or theft of ECI property.
- Do not disclose any confidential or proprietary information about ECI, its suppliers, customers, or other constituents, outside of ECI without written permission.



Confidential business information includes non-public information about the company, including, for example, information about:

- Pricing (both suppliers and customers)
- Trade secrets or other proprietary information
- Company financial information
- Sales or marketing initiatives
- Information about transactions with other companies
- Other business information not in the public domain
- Sales forecasts
- Research and development
- Customer information

Protecting Privacy and Personal Information

OUR COMMITMENT

We respect and protect the privacy of all individuals who entrust us with their personal information, including our employees, suppliers, and customers. Protecting this information is our responsibility, not just a legal requirement.

DOING YOUR PART

- Use care when dealing with information that could be used to identify an individual (Personal Information) including names, gender, email addresses, financial records, and online identifiers, such as a Twitter handle.
- Only collect Personal Information for legitimate business purposes and only retain it as long as it is needed.
- Only share Personal Information on a "need-to-know" basis.



FUNDAMENTAL RESPONSIBILITY ALERT!

Many data privacy laws require that data breaches be reported very quickly – sometimes within 72 hours. It is critical that you promptly report any actual or suspected unauthorized uses, disclosures, or access to ECI data or Personal Information to the Legal Department.

Respecting Our Markets and Customers

Creating Safe, High-Quality Products

OUR COMMITMENT

We provide our customers with superior quality products and always work to ensure that our products are safe to use. We seek to comply with all applicable product safety laws and implement procedures to ensure safety and quality in our production, handling, storage, and shipping processes.

DOING YOUR PART

- Always follow ECI policies relating to safety and quality control.
- Make sure all new products, processes, and suppliers satisfy the relevant quality and safety standards.
- Implement and follow the Company's procedures for notifying customers or recalling products where quality or safety standards are not met.



FUNDAMENTAL RESPONSIBILITY ALERT!

Never turn a blind eye if you are worried about product quality or safety. Tell your supervisor immediately if you are concerned that a product might not be safe or of good quality, even if it complies with applicable standards. Always draw attention to technical issues and imperfections that could lead to problems.

Maintaining Strong Internal Controls

OUR COMMITMENT

We are honest and accurate when recording and reporting financial and business information. We maintain accurate books and records and do not omit or misrepresent facts and figures. We are committed to providing full, fair, accurate, timely, and understandable disclosures of financial information.

DOING YOUR PART

- Make sure any books or records you are responsible for are accurate, sufficiently detailed, and up to date so they give an accurate picture of our business. This responsibility is shared by all of us, not just ECI's accounting and financial personnel.
- Never misrepresent facts, or permit others to misrepresent facts, about ECI.
- Make sure you disclose all facts that are necessary to ensure that information relating to ECI is not misleading.
- Cooperate with all requests from our internal and external auditors.
- Never compromise transparency and accuracy in our internal or published accounts and never knowingly misrepresent facts about ECI.



FUNDAMENTAL RESPONSIBILITY ALERT!

If you have any concerns about accounting or auditing matters, such as inaccurate, false, or misleading information, promptly report your concerns to ECI's Chief Financial Officer or General Counsel. If you receive financial or other information about ECI that you think contains errors or is false or misleading, please speak up.

Supporting Free and Open Competition

OUR COMMITMENT

We believe that vigorous competition is the best mechanism for ensuring the production of high quality, well-priced, and innovative products and services. We compete solely based on our superior and innovative products and services and never engage in anti-competitive practices or seek to limit competition through illegal or unfair means.

DOING YOUR PART

- Never share confidential business information with our suppliers, or customers unless there is a nondisclosure agreement in place.
- Never share confidential business information with ECI's competitors. This could include information about marketing or sales activities, pricing of products or services, details about customers or suppliers and more.
- Always make commercial decisions independently and use caution when communicating with competitors. Do not coordinate or cooperate with competitors in any way. For example, we must not coordinate or cooperate with competitors to determine prices for ECI products, to allocate customers to particular companies, or to allocate specific sales territories.
- Do not exert inappropriate pressure on suppliers or customers.



FUNDAMENTAL RESPONSIBILITY ALERT!

Antitrust and competition issues are very complex. If you deal with the sale of our products or interact with our competitors, you must have a deep understanding of our antitrust policies and procedures. If there is any question about whether a course of action might restrain trade or be otherwise improper, contact the Legal Department immediately.

Communicating With the Public

OUR COMMITMENT

We communicate honestly and openly with all who have an interest in our company.

DOING YOUR PART

- Never speak on behalf of ECI unless you are authorized to do so by the General Counsel.
- Take care when posting as your online conduct outside of work may reflect on the company. Do not use personal social media accounts to make statements on behalf of the company.
- Direct any inquiries from the media, analysts, investors, or any other members of the public to our Chief Financial Officer or General Counsel.

Being a Good Corporate Citizen

Respecting Human Rights

OUR COMMITMENT

We believe that all human beings should be treated with dignity and respect and are committed to upholding internationally recognized human rights of all people. We use all reasonable efforts to avoid causing or contributing to human rights abuses and support the adoption of fair and sustainable business practices in our supply chain.

DOING YOUR PART

- Respect the human rights of everyone you interact with professionally.
- Conduct any third-party due diligence required by your position.
- Pay attention to the business practices of our suppliers and business partners and keep an eye out for things like forced labor or underage workers.



FUNDAMENTAL RESPONSIBILITY ALERT!

We are committed to identifying any abuse within our supply chain. If you suspect that an ECI supplier or business partner is violating human rights, promptly report the issue.

Protecting the Environment

OUR COMMITMENT

We recognize the necessity of preserving the environment and we strive to adopt environmentally conscious business practices. We work to consider environmental impact when evaluating projects or operations.

DOING YOUR PART

- Understand and comply with all environmental laws, policies, procedures, and guidelines that apply to your job responsibilities.
- Try to minimize the environmental impact of our operations, products, solutions, and services.
- Look for ways to reduce waste, recycle, and otherwise reduce our environmental footprint.





**Electrical Components
International**

COMMITTED TO ETHICAL EXCELLENCE