

Code of Conduct

Sensing What's Right



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A Message from Stephan

At Sensata, our values unite us in the way we work, every day, across our business and throughout the world. Integrity, Excellence, OneSensata, Flexibility and Passion provide the foundation of our company culture.

Company culture is not something that can be created solely by me or our senior leadership – it consists of the everyday decisions of every single one of us. Living up to our values as a company is only possible when each of us plays our part.

Our Code of Conduct, *Sensing What's Right*, means living up to the principles in our Code in the decisions we make every day – for our people, our business, and our communities. It means supporting one another in making the right decisions. And it means speaking up when you believe misconduct has occurred.

I encourage you to read the Code thoroughly, refer to it often, and always adhere to its principles. Thank you for your ongoing support as we continue *Sensing What's Right*.

Sincerely,

Stephan von Schuckmann, Chief Executive Officer



Our Values

Sensata's Values provide a level-set foundation and are a key way we can change or improve our culture. Moreover, they guide us in delivering on our vision and leading our industry.



Integrity

We are open and honest with all our stakeholders. We do what's right and deliver what we promise.



Excellence

We strive for continuous improvement in all we do. We find new, innovative ways to problem solve, grow our company and ourselves.



OneSensata

We trust, respect and rely on each other. We recognize that a shared vision, diversity of thought and a global team is central to our enduring success.



Flexibility

We operate in a dynamic, fast-paced environment and act with agility to best serve our stakeholders.



Passion

We have a dedicated and committed team working to solve some of the world's most challenging problems. We are passionate about serving customers and building our future.



Why We Have a Code

Our company culture is built by the day-to-day actions of each of you, our employees. Sensata's Code of Conduct is your practical guide to upholding Sensata's values and *Sensing What's Right* for our people, our business, and our communities. It provides a framework that ensures we act with the highest standards of integrity in our day-to-day activities and clearly sets forth the standards that we expect of each other at Sensata.

Everyone who works for Sensata has a duty to read, understand, and abide by this Code. The Code applies equally to every employee worldwide, from direct line workers to our Board of Directors and senior management. Individuals and entities acting on behalf of Sensata, including agents, representatives, contractors and other third parties, must also comply with the letter and spirit of our Code when providing goods and services to the Company or acting on our behalf.

Since the Code does not address all possible situations you might face in your work, you are expected to use good judgment when *Making Sense of It*, ask for guidance when uncertain, and speak up when something isn't right.

To the extent there is a direct conflict between the Code and other Company policy, the Code will control, subject to applicable law. For a complete list of policies and standards, refer to our Policy Center on the Sensata Intranet.

Subject to applicable law, Company employees who violate this Code and other Company policies may be subject to disciplinary action, up to and including termination. In addition, supervisors who, through lack of diligence or supervision, fail to prevent or report violations may also be subject to disciplinary action.

How to Make Good Decisions

At times you may face a situation where the right thing to do is not always obvious. When you face such a situation, ask yourself these questions:



Is it legal?



Is it consistent with our values, policies, and culture?



Would I be comfortable telling my family and friends about it?



Yes to all

Move forward



Unsure

Get advice – speak to your supervisor or contact Human Resources or the Legal Department.



No to any

Stop, don't do it!



Whistleblower Policy

Maybe you sense that something is not right at work. Maybe you saw something or heard about an act that may violate our Code, our policies, or the law. If so, you have a responsibility to speak up by reporting your concerns right away – even if you are not sure that a Code violation has occurred. Sensata offers multiple channels for reporting actual or suspected Code violations. You can go to:



The Sensata Hotline allows employees, customers, suppliers and other stakeholders to report genuine concerns relevant to the Code, inappropriate or illegal behavior, or violations of Sensata policies or local laws. The Sensata Hotline is operated by an independent third party, is available 24 hours a day in your local language and allows you to remain anonymous, where permitted by law. Please keep in mind that the more information you provide, the easier it will be for the company to investigate and respond to the concern. You may either call or report online.





Reports of suspected Code violations made through any channel will be appropriately investigated and treated confidentially to the extent possible in light of Sensata's need to conduct an investigation and follow up on any concerns. Employees are expected to cooperate in internal investigations of alleged misconduct. Never conduct your own investigations. Investigations often involve complex legal issues, and acting on your own may compromise an investigation.

Sensata prohibits retaliation against employees for making a good faith report of suspected misconduct or for cooperating in an investigation. If you are aware of retaliation (against you or another employee), report it right away. Sensata will investigate the matter and take appropriate action. Please note that routine employee issues are best dealt with by your local HR team.



A good faith report is one that you believe to be true and that contains all the information you have – even if it is later determined that you were mistaken.

When I Contact the Sensata Hotline...



Can I report anonymously?

Yes. The Sensata Hotline is managed by an external third party and you do not have to provide your name.



Who investigates my report?

Your report will be sent to the Legal Department and assigned to an appropriate person to investigate. Each report is taken seriously and fully investigated.



I want to report a concern but I'm afraid I will be retaliated against.

Sensata does not tolerate retaliation for reporting a genuine concern. Your report will be handled discreetly and in a confidential manner, to the extent reasonably possible and allowed by local laws.



If You Sense Something Is Wrong, Speak Up!



Sensing What's Right for Our People

We Put Safety First

We Respect Each Other

We Believe in our Culture and a Sense of Belonging



We Put Safety First

Sensata is committed to providing a safe and healthy workplace for our employees, contractors, customers and visitors. *Sensing What's Right* when it comes to health and safety means that we protect ourselves and each other, and we perform our duties in a safe manner at all times.



We follow the Company's [Global Environmental Health and Safety Policy](#) and [Cardinal Rules of Environment and Safety Zero Tolerance Policy](#), including understanding the hazards of each job, wearing proper personal protective equipment, and immediately reporting to our supervisors all work-related safety incidents, regardless of severity.

We are each responsible for safety in the workplace – safety is owned by every employee at every site.

Making Sense of It



My supervisor asked me to skip some required safety checks to meet a customer deadline. What should I do?

Do not skip these procedures. No matter who asks you to do something, if you know it is wrong, don't do it. We put safety first. If you are uncomfortable discussing this with your supervisor, contact your supervisor's supervisor or any of the other resources identified in this Code.





We Respect Each Other

We maintain a workplace where everyone is treated fairly and with respect. *Sensing What's Right* means we protect against unlawful discrimination or any behavior that creates an offensive, hostile, or intimidating work environment.

Fair and Respectful Workplace Practices

We are fair and equitable in all employment decisions, which are based on merit and never on personal characteristics. We also prohibit sexual and other forms of harassment.

In order to keep our workplace an environment we are proud to work in each day, any incidents of discrimination or harassment must be stopped as soon as possible.



For additional information see:

[Human Rights and Working Conditions Policy](#)



When to Speak Up

If you observe, experience, or suspect discrimination or harassment, promptly report it to your supervisor, your local Human Resources representative, or any of the other resources set forth in this Code.



Making Sense of It

Some of the other employees in my group joke about the woman who sits down the hall from us, and in particular, comment on the way she dresses and walks. I know that they don't mean to cause harm, but the joking bothers me, and I'm afraid she may hear, which would be terrible. I've asked them to stop. They responded that I should improve my sense of humor. What should I do?

Inform your supervisor or local Human Resources representative about the comments. The "jokes" are not funny to Sensata. They are instead a violation of our commitment to fairness, respect and dignity, and against our policy.

You want to apply for a job in another part of Sensata but were told that the supervisor of the position thinks the role should be filled by a young employee. Is this permissible?

No. The Company does not allow discriminatory attitudes about age or any other protected category to influence hiring decisions. Report the matter to your local Human Resources representative or any of the other resources identified in this Code.



We Respect Each Other

Fair Compensation

We are committed to complying with all applicable wage and hour laws in every country where we operate and regularly monitor wage rates to ensure employees are paid at or above the wages prescribed by the jurisdictions where they work.

Preventing Violence, Abusive Behavior and Bullying

At Sensata, we are committed to a non-violent working environment, free of threats, bullying, intimidation, and physical harm. Employees may not bring weapons or other dangerous devices on Sensata property or our customers' property.

Making Sense of It



I learned that one employee with whom I work recently threatened another employee. The employee who received the threat is too frightened to report it. What should I do?

Speak with your supervisor, local security, or Human Resources about the incident immediately. No employee should be subject to threats. Sensata will address the situation promptly.





We Believe in our Culture and a Sense of Belonging

We are firmly committed to a culture of belonging that promotes inclusion and cultivates a sense of community throughout the entire employee experience.

We believe this is critical to the success of our company, as an engaged workforce fosters creativity, fuels innovation, guides business strategies and drives long-term success. We are committed to identifying and preventing discrimination in our business practices and ensuring our employees feel a sense of belonging and respect every day, enabling them to bring their whole selves to work so they can engage, contribute and deliver results.

Each person brings unique value through their varying backgrounds and life experiences, no matter their age, race, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical or mental ability, political affiliation, religion, sexual orientation, socio-economic status, veteran status and other characteristics that make our employees unique. It is our policy and practice to hire and employ qualified individuals without regard to these characteristics. We strive to create and foster a supportive and understanding environment in which all employees can do their best work and have an equal opportunity to contribute, learn, lead and succeed.



For additional information see:

[Commitment to a Culture of Belonging](#)





Sensing What's Right for Our Business

We Comply with the Law

We Do Not Tolerate Bribery

We Are Responsible with Gifts, Meals and Entertainment

We Avoid Conflicts of Interest

We Safeguard Company Assets

We Compete Fairly

We Do Not Trade on Inside Information

We Maintain Accurate Records

We Communicate Responsibly

We Comply with the Law

As a global company operating across multiple countries and jurisdictions, Sensata is committed to full compliance with all applicable international, national, and local laws and regulations. This includes global trade compliance, product and quality, anti-money laundering, data privacy, and other legal obligations that govern our international operations.

Sensing What's Right means knowing the laws and regulations related to your job in the countries where you do business. When local laws conflict with our Code of Conduct, we apply the higher standard. If you have questions about legal requirements in any jurisdiction where Sensata operates, consult with the Legal Department before proceeding with business activities.

Global Trade Compliance

Sensata is subject to numerous laws and regulations governing how we import and export products from the countries where we do business. We are also subject to laws that prohibit us from doing business in some countries or with certain individuals or organizations.

Sensata is firmly committed to compliance with both U.S. trade laws and economic sanctions and those of other applicable jurisdictions. Additionally, Sensata will not participate in unsanctioned country boycotts. If your responsibilities include the purchase, sale or transfer of goods, services or technology between countries, you must stay informed of current law and Company policy. If you are ever unclear on whether or how to proceed, contact the Global Trade Compliance Department.



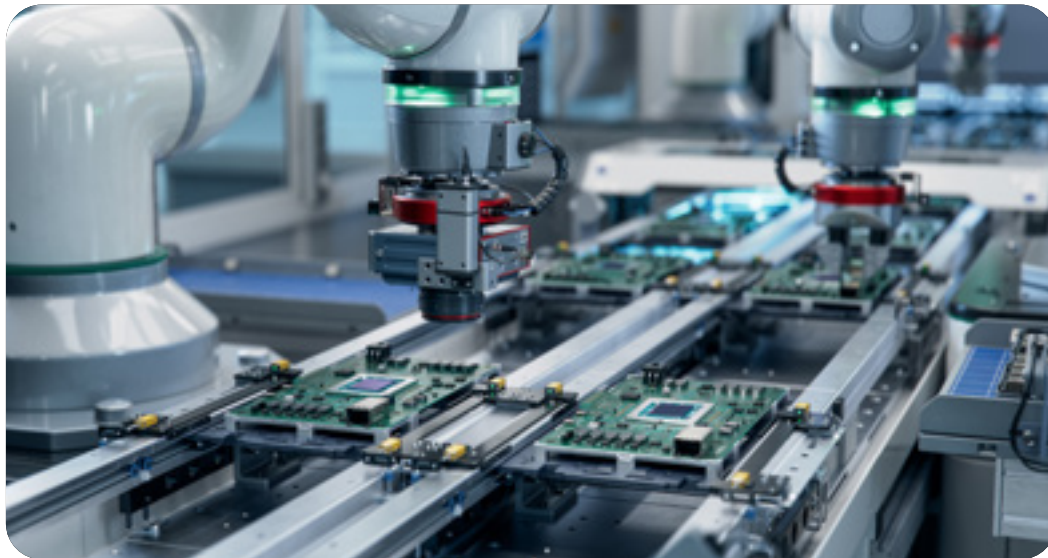
For additional information see:

[Global Trade Compliance Policy](#)

We Comply with the Law

Product and Regulatory Compliance

Sensata is subject to local and global product regulations and protocols designed to ensure our products and services are safe and used appropriately. We prioritize the production and delivery of safe and effective products and services that meet these requirements and that our customers trust. We recognize that our ability to deliver high-quality and compliant products is integral to maintaining our reputation and viability as a company. Promptly report to the applicable customer support organization any concerns about the quality or safety of our products and services.



For additional information see:

[Product Safety Policy](#)



Anti-Money Laundering

Sensata is committed to preventing our operations from being used to facilitate money laundering or the financing of terrorism. Money is “laundered” when funds from criminal activities (such as terrorism, drug dealing or fraud) are processed through commercial transactions to conceal the source, avoid reporting, or evade taxes.

Sensing What's Right means:

- We watch out for irregularities in the way payments are made, such as cash payments or payments made from personal accounts instead of business accounts.
- If you have concerns about a payment, request an alternative form be used and report the concern to your manager.
- We always know who is behind every transaction, only conduct business with reputable third parties engaged in legitimate business activities, and report any suspicious activity to the Legal Department or the Sensata Hotline immediately.



We Comply with the Law

Protecting Privacy

Sensata is committed to responsibly collecting, handling, and protecting personal information of our employees, customers and other third parties, and in compliance with applicable privacy and data protection laws. Personal information is data that can be used to identify a specific person such as a name, address, photo, birth date, phone number, driver's license number, credit card number or email address. Some countries have an even wider definition of "personal information".

Sensing What's Right means we always:

- Collect and use personal information only if we have the right to do so and only for legitimate business purposes.
- Take special care to limit access to personal information on a "need to know" basis.
- Disclose, use, and transfer personal information consistent with applicable law and Sensata's policies.
- Protect personal information from loss, misuse, or disclosure.



For additional information see:

[Privacy Policy](#)



We Do Not Tolerate Bribery

We prohibit all forms of bribery and corruption across all Sensata operations, in all of our locations and in all of our interactions.

This applies whether dealing with customers, suppliers, or with government officials, and whether by Sensata employees directly or by third parties on our behalf. We are committed to winning customers through the quality and value of our products and selecting business partners based on merit and never through improper payments or favors.

Sensing What's Right means:

- We do not give or accept cash or cash equivalents or anything else of value in order to secure an unfair business advantage.
- We ensure competitive selection of suppliers.
- We do not make payments or provide any benefit to government officials to obtain business or other favorable treatment or to avoid a fine or penalty.
- We do not make facilitation payments to government officials to speed up their performance.
- We prohibit kickbacks or the illegal practice of offering or accepting bribes in exchange for providing favorable treatment or services.



Bribery means offering, providing, seeking or accepting something of value to improperly influence a business decision or obtain a business advantage. Bribes extend far beyond cash and can include:

- Excessive entertainment and hospitality
- Inappropriate discounts or preferential pricing
- Employment opportunities for family members
- Personal travel that is unrelated to business
- Charitable contributions made to influence business decisions
- Gifts, meals, or other benefits of significant value

We Do Not Tolerate Bribery

Doing Business with Governments

When working with government officials, we maintain the highest standards of integrity, transparency, and truthfulness. Non-compliance can result in civil and criminal penalties, exclusion from future government opportunities, imprisonment, and severe reputational damage. When conducting government business:

- We comply with all government procurement laws and competitive bidding procedures.
- We submit only truthful and accurate information to government entities.
- We never offer anything of value to government officials to obtain or retain business or expedite routine clerical or administrative actions such as issuing permits or licenses (e.g. facilitation payments).
- We avoid discussing employment opportunities with government officials or their families.
- We route all government investigations, audits, and inquiries through the Legal Department.



For additional information see:

[Anti-Corruption and Anti-Bribery Policy](#)

Making Sense of It



Our business needs a government permit to build a new manufacturing plant. I'm working with a consultant who requested \$50,000 to help obtain the permit. When I questioned his above market fees, he said that he needs the money to "help move the process along." He didn't explicitly mention paying a bribe, so can I give him the retainer? We urgently need the permit.

No, do not proceed with this arrangement. The consultant's language about "moving the process along" combined with above market rates are clear red flags indicating improper payments. Consult with the Legal Department who will assist you in conducting due diligence on the consultant before Sensata enters into an agreement with him. Remember, Sensata is responsible for third-party actions taken on our behalf, and Sensata can be held liable for bribery if the Company knew or should have known that our funds were being used for improper purposes. No business need is urgent enough to risk violating anti-corruption laws, which can result in severe penalties and permanent damage to our reputation.



When to Speak Up

Contact your supervisor, Human Resources, Legal Department, or the Sensata Hotline if you:

- Encounter requests for improper payments or favors
- Become aware of potential bribery by employees or third parties
- Face pressure to make facilitation payments
- Have questions about gifts, entertainment, or hospitality
- Receive government investigation requests



We Do Not Tolerate Bribery

Making Sense of It



I'm trying to get an export license processed for our shipment to a customer overseas. The government clerk told me the normal processing time is 3-4 weeks, but he said for \$200 he could "expedite" it and have it ready in a few days. This seems like a small facilitation payment to speed up routine paperwork. The customer is threatening to cancel the order if we're late. Can I make this payment?

No. Sensata prohibits all facilitation payments, regardless of amount or local customs. Even though the clerk is offering to expedite routine administrative work, any payment to a government official to influence the timing of their duties violates our policy and anti-corruption laws. Facilitation payments may seem harmless, but they perpetuate corruption and can escalate into larger demands.

I am currently working on a project where our customer is a U.S. government agency. I have heard that my primary contact at the agency is planning to leave her job soon and may be interested in working in the private sector. I think that she would be a fabulous addition to our team. Would it be okay to have very preliminary discussions with her, just to find out if she might be interested in working at Sensata?

No. Contact the Legal Department before having any employment-related discussions with government officials or employees. Strict rules govern these interactions, and the Legal Department can ensure we remain compliant while exploring legitimate opportunities.





We Are Responsible with Gifts, Meals and Entertainment

When making business decisions for Sensata, your decisions must be based on merit, not influenced by personal benefits received or offered.

Sensing What's Right means never accepting gifts or other benefits if your business judgment or decisions could be affected, or could *appear* to be affected, by the gifts.

We Prohibit Giving or Accepting:

- Gifts of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) in any amount
- Bribes, kickbacks, or payments that create improper obligations
- Gifts or entertainment that could influence or appear to influence business decisions
- Soliciting or requesting gifts, meals, or entertainment from business partners
- Providing or accepting courtesies that violate another company's policies

We Do Permit Giving or Accepting Unsolicited Gifts When They Are:

- Customary and commonly accepted in business relationships
- Modest in value and infrequent
- Given and accepted without any obligation or expectation of favorable treatment
- Consistent with both Sensata's and the other party's policies express or implied understanding that the recipient is in any way obligated by acceptance of the gift.



When to Speak Up

Gifts that are extravagant in value or unusual in nature should not be offered or accepted without the prior written approval of your supervisor or Human Resources.



For additional information see:

[Corporate Expense Policy](#)

We Are Responsible with Gifts, Meals and Entertainment

Examples of gifts and entertainment OKAY to give and receive:

- Modest meal where business is discussed
- Modest gift that displays a company logo
- Conference gift bag with snacks and small toiletries

Examples of gifts and entertainment NOT OKAY to give or receive:

- Cash or cash equivalents (for example, gift cards)
- Extravagant meals for family members paid for by supplier not in attendance
- Airfare and accommodations to a beach resort
- Expensive electronics (e.g. tablets, smartphones, laptops)
- Gifts or entertainment that violate Sensata's or the other company's gifts and entertainment policy



Making Sense of It



A supplier invited me to dinner at an upscale restaurant to discuss our contract renewal. The meal cost about \$300 per person. Is this acceptable?

This depends on the context. If it's a working dinner where substantive business is discussed and the cost is reasonable for your market and industry, it may be acceptable. However, \$300 per person could be seen as extravagant. Discuss with your supervisor before accepting, and ensure it's documented properly. If the supplier makes this a frequent practice or if no business is actually discussed, decline the invitation.

Our customer sent me a \$100 gift card as a thank you after we completed a major project. Can I keep it?

No. Cash equivalents including gift cards are prohibited regardless of amount or circumstance. Politely return it to the customer, explaining that while you appreciate the gesture, Sensata policy does not permit accepting gift cards.

A vendor offered to pay for my hotel stay at an industry conference we're both attending. They said it would be more convenient since we have early morning meetings. Should I accept?

No. Even though the reasoning seems practical, accepting travel or accommodations from vendors creates the appearance of obligation and violates our policy. Sensata should pay for your business travel expenses. You can still meet the vendor for business discussions at the conference without accepting their payment for your accommodations.

We Avoid Conflicts of Interest

We must act in Sensata's best interest, independent of outside influences that could compromise our judgment. A conflict of interest occurs when your personal, financial, or family interests or relationships interfere, or appear to interfere, with your ability to make objective business decisions for Sensata.

You must not knowingly place yourself in a situation that creates an actual or apparent conflict with Sensata's interests. All conflicts of interest, whether actual or apparent, must be promptly disclosed in accordance with Sensata's disclosure procedures. The Company will then determine if a conflict exists and, if so, what steps should be taken to address it.

Common Conflicts of Interest Situations

Financial Interests

- Significant financial interest in current or prospective customers, vendors, or suppliers, or in a Sensata competitor (more than 5% of a public company or any ownership in a private company)
- Director, officer, or partner roles, including those of family members, in companies doing business with Sensata
- Corporate or business opportunities discovered through your Sensata role that you pursue personally

Employment and Business Activities

- Outside employment with Sensata competitors, customers, vendors, or suppliers
- Consulting work that interferes, or could interfere, with your ability to do your job with Sensata
- Using paid time off to pursue unauthorized outside work

Personal Relationships

- Family or close friend connections to Sensata competitors, customers, vendors, or suppliers
- Hiring, promoting, or supervising a family member or romantic partner

Permitted Situations

- Serving as an officer or on the board of directors or other advisory body of an outside business unrelated to Sensata's business **after** receiving prior approval in writing from the Chief Executive Officer or Chief Financial Officer
- Serving on charity boards
- Participating in another business unrelated to Sensata's business provided it does not interfere with your employment at Sensata



We Avoid Conflicts of Interest

Making Sense of It



My sister-in-law owns a company that wants to become a supplier to Sensata. They offer excellent service at a reasonable price, and I'd like to engage her company. Is that a conflict of interest?

Yes. Even if you feel that your sister-in-law's company offers a better value than her competitors would, do not be involved in the business decision. Disclose this situation to your supervisor or the Legal Department and do not attempt to influence Sensata's decision. Please note that if you are in a senior position, it would be difficult to avoid the appearance of influence even without any proactive involvement on your part.

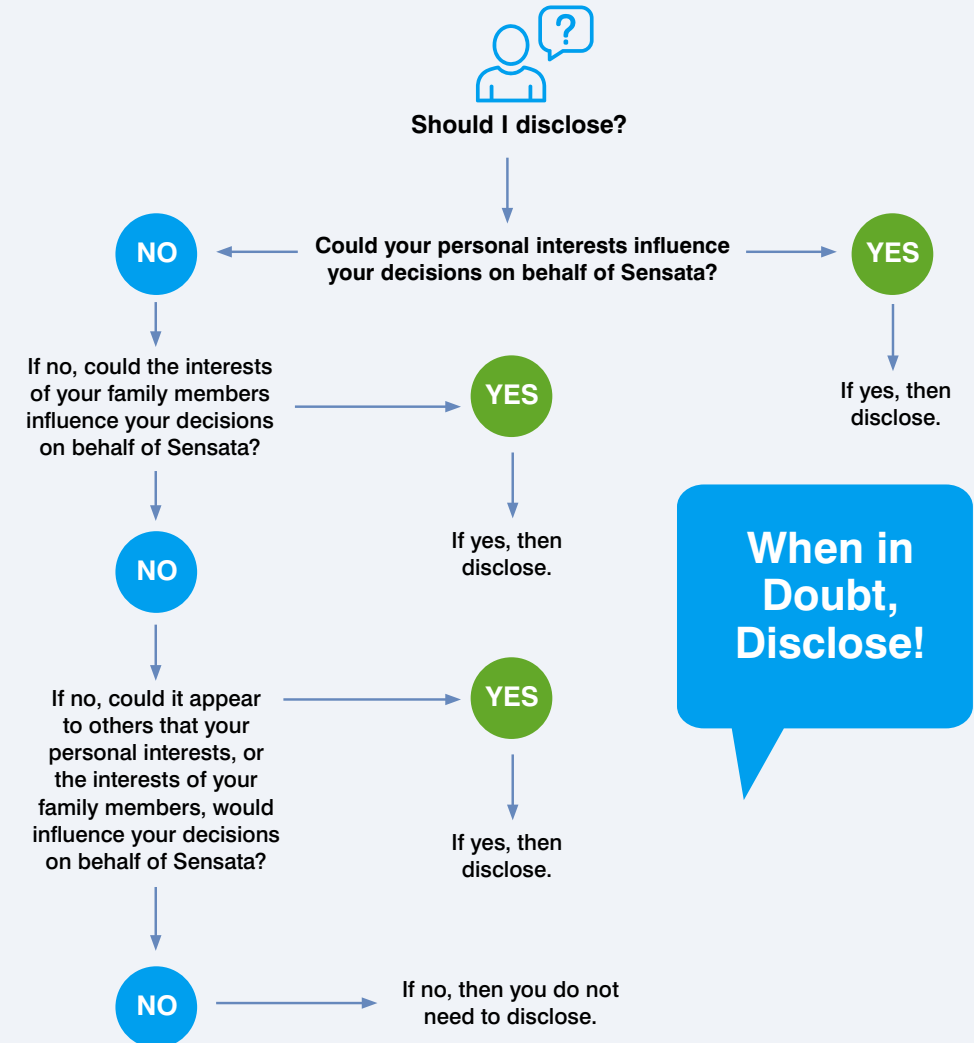
A Sensata customer mentioned they're looking for a marketing consultant. Can I recommend my spouse's consulting business?

No. This would be using your Sensata position and customer relationships for personal gain, creating a clear conflict of interest. Even if your spouse is qualified for the work, leveraging company relationships for personal business opportunities is prohibited and must be avoided.

My college roommate started a tech company and asked if I'd join their advisory board. They're not a Sensata competitor and I wouldn't receive any compensation. Is this okay?

You need written approval from the CEO or CFO before accepting any outside board position, even unpaid advisory roles. The company that seems unrelated to Sensata today could become a competitor, customer, or supplier tomorrow. Submit your request with details about the company and your proposed role.

When to Disclose Conflicts of Interest





We Safeguard Company Assets

Sensata's assets—physical, intellectual, and digital—are critical to our success. We all share responsibility for protecting these assets from theft, loss, damage, misuse, and unauthorized access.

Physical Assets

Sensata's physical assets include facilities, company funds, equipment, raw materials and inventory, and computer and communications systems. You must treat Sensata's physical assets with care and use them primarily for Company business. It is your responsibility to protect the Company's physical assets from theft, loss, damage and misuse, including unauthorized access and to use physical assets responsibly and efficiently.

Confidential Information

Confidential information is any non-public information that, if disclosed, could harm Sensata, our customers, or business partners, or that could benefit competitors. We all have a responsibility to safeguard Sensata confidential information and the confidential information of our employees, customers, and third parties.

Sensing What's Right means:

- We share confidential information only with employees who need the information to perform work responsibilities or authorized external parties.
- We follow all Sensata policies for information security and data protection.
- We never use illegal or unethical means (such as theft, spying, misrepresentation) to obtain competitor information.
- We continue protecting Sensata confidential information even after employment ends.



Examples of confidential information include:

- Non-public financial data and business metrics
- Trade secrets and know-how
- Acquisition, divestiture, and strategic business opportunities
- Customer and supplier lists, contracts, and pricing information
- Marketing plans, product roadmaps, and competitive strategies
- Employee personal information



We Safeguard Company Assets

Intellectual Property

We respect and protect the intellectual property of Sensata and of other companies, including those that formerly employed our current employees. This includes patents, copyrights, trademarks, and other forms of intellectual property. We must take appropriate steps to protect Sensata's intellectual property, never bring confidential information from former employers to Sensata, and consult the Legal Department with any intellectual property questions.

Cybersecurity and Data Protection

Each one of us plays a critical role in maintaining strong cybersecurity practices. Paying attention to security and to situations that could lead to the loss, misuse or theft of Company or customer property is the best way to ensure a secure workplace and protection of the Company's assets. We must take necessary measures to secure our computers, passwords, and other technological resources.

Security Best Practices

- Secure computers, mobile devices, and accounts with strong, unique passwords.
- Never share passwords with anyone, including supervisors or colleagues.
- Enable multi-factor authentication when available.
- Lock devices when away from your workstation.
- Encrypt laptops and mobile devices containing company data.
- Be alert to phishing attempts, suspicious emails, and social engineering.
- Report security incidents or suspicious activity immediately to IT Security.

Artificial Intelligence

At Sensata, we leverage artificial intelligence (AI) technologies to advance our mission of building a safer, cleaner, more efficient and electrified world. All use of AI must align with our principles and values and comply with applicable laws and regulations.

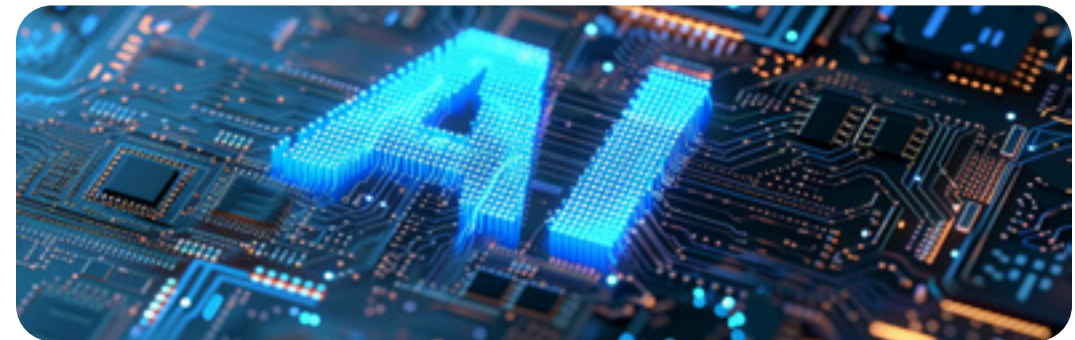
Sensing What's Right Means:

- We use AI ethically and ensure transparency and fairness.
- We comply with all relevant laws, regulations, and company policies.
- We ensure AI systems are safeguarded against unauthorized access, data breaches, and other security threats.
- We take accountability for the outcomes of AI applications and ensure they align with company values.



For additional information see:

[AI Usage Policy](#)





We Safeguard Company Assets

Making Sense of It



A former Sensata colleague who left the company last month asked me for a copy of a pricing strategy report she helped create when she worked here. Can I send it to her?

No. The fact that she contributed to the report while employed at Sensata doesn't give her rights to access it after leaving. This is confidential company information. Even if we redacted numbers or other information, it is protected company know-how and thus could be considered a trade secret. Inform your supervisor about the request and work with them to handle the response appropriately.

We just hired someone from a competitor. My team wants to meet with him to learn about the competitor's plans and product roadmap. Is this okay?

No. The new employee's knowledge likely includes his former employer's confidential information, which he has an ongoing obligation to protect. Do not ask about or discuss the competitor's confidential strategies, plans, or proprietary information. Focus on his skills and expertise, not his former employer's secrets.

I left my laptop on an airplane, and my passwords were on a yellow sticky on the bottom of my laptop. What should I do?

Immediately contact Sensata's Information Technology Department to report the situation. You may be asked to undergo additional training on Information Technology Security. Never physically keep your passwords with your laptop, and work with IT to ensure that your laptop is encrypted and otherwise appropriately protected.

My supervisor asked me for my computer password because I am going to be on vacation. Is this okay?

No. Never share your password with anyone, including your supervisor. If your manager needs access to specific files during your absence, work with IT to set up proper file sharing or delegate access through authorized channels before you leave. There is no business reason that would require you to provide your password to your supervisor.





We Compete Fairly

Sensata competes vigorously in all of our business activities, but we do so ethically and in full compliance with applicable antitrust and competition laws. Our success is built on the quality and value of our products and services, not on anticompetitive practices or unfair dealing.

Antitrust and Competition Law Compliance

Antitrust laws protect free and fair competition by prohibiting agreements and practices that restrict competition. Violations can result in severe consequences including criminal penalties, substantial fines, and imprisonment. We never engage in agreements or discussions with competitors about:

- **Price fixing** – Setting, maintaining, or coordinating prices or pricing strategies
- **Bid rigging** – Coordinating bids or deciding who will win contracts
- **Market allocation** – Dividing customers, territories, or markets
- **Output restrictions** – Limiting production or supply to control prices
- **Boycotts** – Collective refusals to deal with specific customers or suppliers



You must consult the Legal Department before:

- Entering exclusive dealing agreements requiring customers or suppliers to work only with Sensata
- Establishing tying arrangements that require purchasing multiple products together
- Implementing pricing strategies that could be considered predatory (for example, offering a discount that results in the sales price of a product being below the product's cost, with the intention of sustaining that price long enough to drive competitors out of the market)
- Joining trade associations or industry groups
- Attending meetings where competitively sensitive topics may be discussed
- Agreeing with suppliers to limit their sales to our competitors
- Controlling resale prices with distributors or trading partners



We Compete Fairly

Fair and Honest Dealing

We deal fairly with our customers, suppliers, competitors, employees, regulators, and everyone else.

Sensing What's Right means:

- We compete based on merit, quality, and value and never through dishonest or unfair practices.
- We make products that we can be proud of.
- We prioritize product quality, and we describe our products in a fair and accurate way.
- We always do business with honesty and integrity.

Obtain Information Ethically

Learning about our competitive landscape is legitimate and important, but we must do so ethically and legally.

Sensing What's Right means:

- We use publicly available sources whenever possible.
- We do not ask for sensitive or confidential business information directly from a competitor.
- While it may be okay to ask customers and third parties about competitors, we do so with integrity and never use our business relationships to obtain information improperly.
- We never ask current or former employees of competitors to share confidential business information.

Making Sense of It



A competing sales executive asked me if his company and Sensata can “coordinate” our bids on an NBO we are submitting to a potential customer to ensure whichever of us wins the bid will have an adequate margin. Can we do this?

No. This is illegal “bid rigging,” exposing both you and the Company to serious criminal penalties. Do not engage in this conversation. End the discussion immediately, do not agree to anything, and report the incident to the Legal Department right away.

A new hire who used to work for a competitor gave me some non-public information about a competitor. I didn't ask for it, but now that I have it, what should I do?

No matter where the information came from or what the motivation of the person giving it to you was, do not review or make copies of the material or share it with others. Instead, contact the Legal Department immediately. Using improperly obtained competitor information exposes both you and Sensata to serious legal liability.

At an industry conference, competitors started discussing what prices we should all charge for a new product category. What should I do?

Immediately excuse yourself from the conversation and leave the area. Do not participate in any way, even by listening. Document what was discussed and who was present, then report the incident to the Legal Department. Your prompt departure protects both you and Sensata from potential antitrust violations.

A customer asked if we could match a competitor's price and also told me what that price is. Is it okay to use this information?

Yes, this is generally acceptable. Information voluntarily provided by customers in the normal course of business negotiations is typically legitimate competitive intelligence. However, be cautious about probing too deeply for competitor confidential information or pressuring customers to share details they seem uncomfortable disclosing.



We Do Not Trade on Inside Information

Employees often have confidential information about their company, its customers, its suppliers or other companies with whom their company has or may have a business relationship.

Some confidential information is particularly significant and could influence investors if they were made aware of it ("non-public information"). Examples include financial results, new or lost contracts, new products, a significant merger or acquisition, sales results and important personnel changes, each before public disclosure.

The purchase, sale or gifting of shares or securities in a company based on non-public information is known as insider trading. Insider trading is illegal and strictly prohibited. Providing non-public information to others so that they can buy or sell shares or securities in a company is also illegal.

Sensing What's Right means:

- We do not trade Sensata or other company securities when possessing material non-public information.
- We do not share material non-public information with anyone who might trade on it, including family members and friends.
- We comply with all closed trading windows and blackout periods.
- We pre-clear trades when required by Sensata policy.
- We consult the Legal Department if uncertain whether information is material or non-public.



For additional information see:

[Insider Trading Policy](#)

Making Sense of It



I learned through my job that Sensata will likely acquire a technology company in the next few months. Without providing details, I suggested to my brother that he might want to buy stock in that company. Is this a problem?

Yes, this is illegal "tipping". Even without sharing specific details, your suggestion was based on material non-public information and could influence your brother's trading decisions. Both you and your brother could face serious legal consequences including fines and imprisonment. Never hint at or suggest investment actions based on non-public information.

During a meeting with one of our major customers, I learned they'll soon announce a large contract award. Can I buy their stock?

No. This is material non-public information about the customer that you obtained through your Sensata duties. Trading on this information would be illegal insider trading, even though it is not Sensata stock. You must keep this information confidential until it becomes public.



We Maintain Accurate Records

The integrity of our business depends on accurate, complete, and timely records. Every employee has a responsibility to ensure the information they record is truthful and complies with all applicable laws and accounting standards.

Financial Records

Our financial credibility with investors, regulators, and stakeholders depends on accurate reporting and requires each of us to properly record information in the Company's books and records, including sales, expenses, costs, payroll, test data, environmental data, and regulatory data.

Sensing What's Right means:

- We record all financial activities honestly, ethically, transparently, and always in compliance with applicable laws and accounting practices.
- We never make false or misleading entries in Company records.
- We never omit information from our records that is required to be recorded.
- We report all financial information—positive or negative—accurately and on time.
- We never manipulate financial, production, or other data to meet the numbers, meet our targets performance goals.
- We do not delay reporting negative financial results.
- We never inappropriately hold back reserves or profits when a project is doing well in order to protect against possible bad numbers in the future.
- We never pressure others to manipulate financial records.

Business Records

All business records, including expense reports, timekeeping records, production data, environmental data, and regulatory submissions, must be accurate, complete, and properly authorized.

Sensing What's Right means:

- We prepare documents accurately, truthfully, and timely.
- We obtain proper authorization when required.
- We submit honest expense reports with appropriate supporting documentation.
- We maintain accurate timekeeping records.
- We preserve records according to company policy and legal requirements.
- We make full, fair, and timely disclosures in regulatory filings.



We Maintain Accurate Records

Records Retention and Legal Holds

We retain Company records for a time and in a manner required by law and Company policy. When litigation, investigations, or audits are pending or reasonably anticipated, special preservation rules apply. If you learn of a subpoena or a pending or contemplated litigation or government investigation, immediately contact the Legal Department. You must retain all records that may be responsive to the subpoena or relevant to the litigation or investigation until you are advised by the Legal Department as to how to proceed.



For additional information see:

[Records Retention Policy](#)



When to Speak Up

Report concerns immediately if you hear comments like:

- “Make the numbers work”
- “Hold those invoices until next quarter”
- “We need to recognize this revenue now”
- “Just delete those emails”
- “Adjust the test data so it passes”

Making Sense of It



It is the last week in the quarterly reporting period. My supervisor wants to make sure we meet our numbers for the quarter, so he asked me to record a sale, even though the sale will not be finalized until next month. We are extremely confident we'll win the business. Should I do what he says?

No. Unless a policy provides otherwise, sales can only be reported after the sale has been finalized. Report this matter to the Legal Department, the Sensata Hotline, or through any of the other resources identified in this Code. Meeting quarterly targets never justifies inaccurate financial reporting.

A colleague asks you to delete certain emails because he believes a lawsuit will be filed and the emails could be embarrassing to him. Should you do this?

No. It would violate our policy – and possibly the law – regarding preservation of records relevant to a legal dispute. Report the matter to the Legal Department or through any of the other resources identified in this Code.

We Communicate Responsibly

How we communicate about Sensata impacts our reputation and credibility. Our communications about Sensata with the media, analysts, and regulators should always be accurate.

Employees may not speak with the press, analysts or regulators on behalf of Sensata or as a Company representative unless expressly authorized to do so. Media inquiries should be sent to Corporate Communications for response and investor inquiries should be sent to the Company's Investor Relations Department.

Social Media Guidelines

Sensing What's Right means using good judgment in your use of social media and other online activity. Generally, your participation in external social media sites should take place on your personal time, except to the extent that your responsibilities for the Company include interaction with social media. Never use social media to:

- Intimidate, harass or discriminate against others.
- Discuss or disclose any confidential financial information, other non-public proprietary Company information, personal information, or any confidential information regarding our clients or other business partners.
- Violate the copyrights, trademarks, or other intellectual property rights of Sensata or any third party.



For additional information see:

[Sensata's Social Media Policy](#)

Making Sense of It



I read an online article with inaccurate information about a Sensata project that I am very familiar with. Can I respond in the "Comments" section to correct the mistake?

No. Only those employees who have been authorized to speak on behalf of the Company may do so. Instead notify Corporate Communications or your supervisor about the article so that appropriate steps can be taken to respond.

On my personal LinkedIn profile, I shared some general thoughts about trends in our industry. A connection asked me to elaborate on how Sensata specifically is responding to these trends. Can I answer?

Be very careful. You can discuss publicly available information about Sensata (information on our website, in press releases, etc.), but you cannot share non-public information about our strategies, any products under development, or competitive plans. If the question asks for information that isn't already public, politely decline or point them to public sources. When uncertain, consult Corporate Communications.



Sensing What's Right for Our Communities

We Respect Human Rights

We Care for our Communities

We Follow Sustainable Business Practices



We Respect Human Rights

Sensata believes that all individuals should be treated with dignity and respect.

Sensing What's Right means we prohibit forced labor, child labor and human trafficking in all of our operations around the world. Beyond prohibiting these practices in our own operations, Sensata prohibits such practices by our contractors, subcontractors, suppliers and their sub-suppliers. We are committed to identifying, assessing and eliminating the risks of modern slavery and human trafficking at not only our facilities and operations, but also within our supply chain. Sensata also supports freedom of association and recognizes the right to collective bargaining.



For additional information see:

[Supplier Code of Conduct](#)

[Annual Slavery and Human Trafficking Statement](#)

[Human Rights and Working Conditions Policy](#)

[Responsible Minerals Sourcing Policy](#)

Be Vigilant. If your work involves selecting or managing third parties, practice due diligence and monitor activities to ensure workers are treated with dignity and respect. If you suspect behavior that violates our Code, report it to your supervisor or any other resource identified in this Code.





We Care for our Communities

At Sensata, we create a long-term positive impact in the communities where we do business. We take our community engagement responsibility seriously.

Sensing What's Right means we respect local people and cultures, comply with applicable laws, and encourage employees to engage in their local communities and support initiatives that strengthen those communities.

Political Activities

Political contributions include any donation to support a candidate, party, or political cause. An in-kind political contribution could be the use of company facilities, resources, or employees' time to further a political campaign.

Sensata does not make political contributions from corporate funds to candidates, political parties, ballot initiatives, referendum campaigns, electioneering communications, non-candidate organizations (such as political convention host committees), or for independent political expenditures.

Sensata may occasionally take action that will help governments understand certain issues that are important to the Company. When doing so, we respect and comply with the laws regarding political contributions in the countries and regions in which we operate.



For additional information see:

[Political Activity Policy](#)

Making Sense of It



My supervisor asked me to contribute to the campaign of our city mayor. The mayor has been very supportive of Sensata, and my supervisor told me that the Company will "make it up to" me. Is that allowed?

No. Decline the request and report the matter using the procedures described in this Code.

A friend with Sensata-friendly political positions is running for local office. She asked if she could hold a campaign fundraiser in the company's training facility outside of business hours. Can we arrange this?

No. This would be an in-kind contribution to the friend's campaign and is an inappropriate political contribution.



We Follow Sustainable Business Practices

Sensata has adopted sustainable practices throughout its operations that are aligned with the goals of our stakeholders and that address the applicable regulatory requirements in the countries where we conduct business.

We comply with applicable environmental laws, and we are committed to continuous improvement of our environmental practices, as well as to the prevention of pollution, injury and ill health at all our facilities worldwide and promoting a culture of collaborating for a more sustainable world. We are each responsible for knowing the environmental responsibilities that apply to our jobs and conducting business in accordance with those responsibilities.

Making Sense of It



We use a contractor to dispose of several regulated substances. Based on some comments I've heard from their employees, I think that they may not be disposing of these substances legally. Since it is not Sensata who is out of compliance, does it matter to us?

Yes. What the contractor is doing could create liability for us, and, even if there were no legal liability, we are committed to environmental stewardship. Talk with your supervisor, or any of the other resources identified in this Code.



For additional information about our commitment to protecting the environment and sustainable business practices, see:

[Sensata's Annual Sustainability Report](#)

[Global Environmental Health and Safety Policy](#)



Further Resources

[Guide For Reporting Concerns](#)

[Hotline Numbers](#)

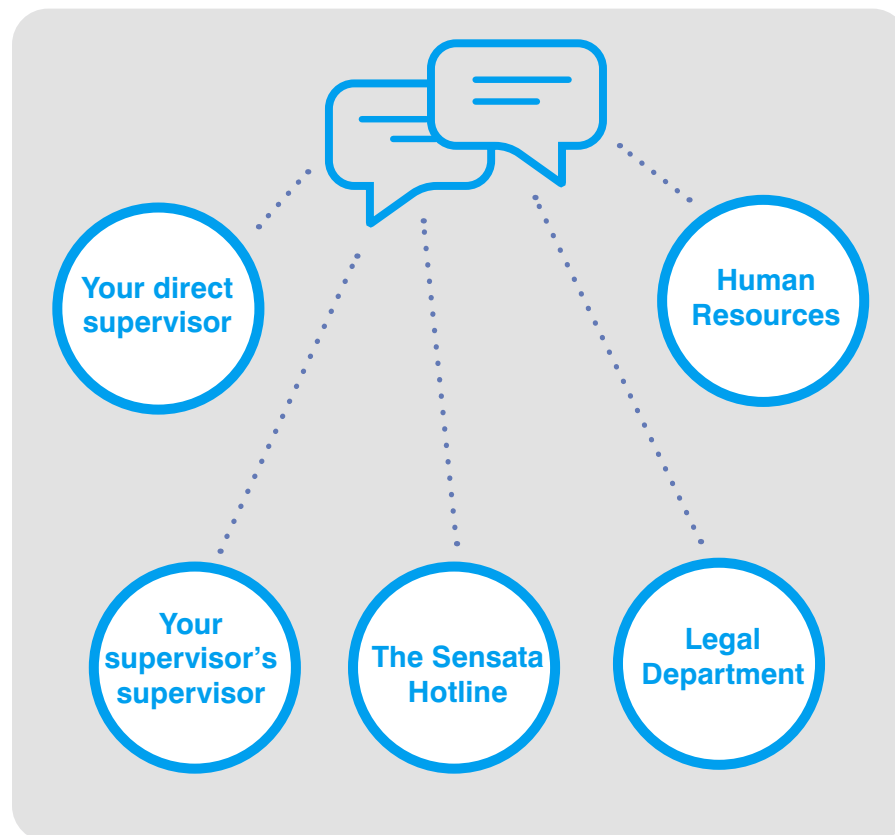
[Responsibilities of Supervisors and Leaders](#)

[Disclaimers](#)



Guide for Reporting Concerns

Remember, if you have a genuine concern about a possible breach of the Code or the law, speak up. Please report your concern to any of the following:



Hotline Numbers

Country	Access Code	Hotline Number
	Dial direct access code first. At the English prompt, dial hotline number.	(toll-free)
Brazil		0800-892-0808
Bulgaria	00800-0019	866-307-3538
Canada		1-844-765-6699
China		4006000265
India	800-0117	844-765-6699
Italy		800-790012
Japan		00531-11-0489 (KDDI) 0066-33-830717 (Softbank Telecom) 0034-800-600347 (NTT)
Korea		00308-13-3138
Malaysia		1-800-81-8738
Mexico		001-844-860-6707
Netherlands		08000200012
United Kingdom		0808-234-2249
United States		1-844-765-6699
France, Germany and all other countries		www.sensata.ethicspoint.com



Responsibilities of Supervisors and Leaders

As a Sensata supervisor or leader, you have a special obligation to demonstrate Sensata's values and to support our employees in *Sensing What's Right*. Sensata supervisors and leaders must:

- **Be a role model.** Set the example of doing business in accordance with Sensata's values. Never encourage or direct any employee to achieve a business result at the expense of violating our Code or the law.
- **Support a culture of compliance and ethics.** Create a workplace environment in which employees feel comfortable asking questions and raising concerns. Encourage employees to refer to the Code. Ensure employees are familiar with the policies that apply to their jobs, support the Company's compliance training and communications, and assist in implementing compliance and ethics initiatives.
- **Listen and offer guidance.** Be available to employees who come to you to raise concerns and ask questions. Assist employees in making ethical decisions.
- **Take action and monitor for retaliation.** If you become aware of suspected misconduct, refer the matter to the Sensata Hotline, Legal Department, Human Resources or any of the other resources identified in this Code. Monitor for retaliation against those employees who report suspected misconduct and those cooperating in investigations.
- **Consider compliance.** Consider employees' commitment to compliance and Sensata values when evaluating and rewarding employees. Help employees understand that business results are never more important than ethical conduct and compliance with policies.

Making Sense of It



Comments like those listed below can create a misunderstanding for employees who hear them. Be sure to support messages about meeting business goals with a reminder that we can only do so ethically. Also remind employees of the many resources available for expressing their concerns.

"We really can't miss the quarter."

"You must find a way to meet our goals."

"Let's keep this to ourselves."

"Nobody needs to know about this."



Disclaimers

Waivers of the Code

We realize that the Code will not cover every possible circumstance, especially when issues arise with contracts or local laws. In the extremely rare situation that a waiver is approved, we will quickly and properly disclose it where required by law. Our Company may modify the Code, as necessary.

Not an Employment Contract

This Code does not alter the terms or conditions of your employment with Sensata. It does not constitute an employment contract or an assurance of continued employment.

No Rights Created

This Code is a statement of the fundamental principles that govern the conduct of the Company's business. It is not intended to and does not create any obligations to or rights in any employee, customer, supplier, competitor, shareholder or any other person or entity.





Sensata
Technologies

