

## **Ethics and Business Conduct Policy**

The Ethics and Business Conduct Policy for Coilcraft outlines expected behaviors for all Coilcraft employees. Coilcraft shall conduct its business in an ethical and proper manner, and in compliance with all applicable laws and regulations. Coilcraft shall strive to continually improve our global Ethical Standards.

- **Business Integrity** The highest standard of integrity is upheld in all business interactions in compliance with applicable laws and regulations. Coilcraft shall strive to avoid conflicts of interest and prohibits all forms of bribery, corruption, extortion and embezzlement.
- No Improper Advantage Coilcraft employees shall not promise, offer, authorize, give or accept bribes or other means of obtaining undue or improper advantage either directly or indirectly through a third party.
- **Disclosure of Information** Coilcraft shall implement restrictions on the use and disclosure of information. This includes following all of the requirements for protecting Coilcraft, customer, and supplier business information. Information shall only be disclosed as authorized by the owner of the information or as otherwise permitted by law.
- Intellectual Property Employees shall protect all Company, customer, and supplier proprietary and confidential property.
- Fair Business, Advertising and Competition Coilcraft will uphold standards of fair business, advertising and competition.
- **Privacy** Coilcraft shall seek to protect the reasonable privacy expectations of personal information of employees and business partners as required by law.
- **Protection of Identity and Non-Retaliation** Coilcraft shall protect its employee and supplier whistleblower confidentiality and anonymity, unless prohibited by law. Coilcraft prohibits retaliation against those raising concerns.
- Responsible Sourcing of Materials Coilcraft shall proactively exercise due diligence on the source and chain of custody of tantalum, tin, tungsten and gold to reasonably assure the procurement does not directly or indirectly finance or benefit armed groups and/or perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.

Every employee has the responsibility to ask questions, seek guidance and report suspected violations of this Ethics and Business Conduct Policy. Retaliation against employees, who come forward to raise genuine concerns, will not be tolerated.

Thomas C. Liebman

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President

February 23, 2018