

METHODE ELECTRONICS, INC.
ANTI-CORRUPTION POLICY

Methode's policy on corruption is absolutely clear: Do not pay or accept bribes.

Purpose. This Policy establishes requirements for business activities and transactions of Methode Electronics, Inc. and its subsidiaries around the world (collectively "Methode") to ensure they are conducted ethically and in compliance with all applicable laws and regulations relating to bribery and corruption.

At Methode, we aim to outperform our competition fairly and honestly, through ethical business practices. We strive to build and maintain trust in our relationships with customers, government authorities, partners, suppliers and other stakeholders.

Applicability. This Policy applies to all interactions and business activities on behalf of Methode. The requirements of this Policy apply to interactions directly by Methode personnel, including all employees, officers and directors, and indirectly by third parties or intermediaries acting for Methode.

Policy Principles and Requirements.

1. Always conduct business with integrity.

- a. Conduct business activities for Methode with integrity and in compliance with all applicable laws, including those related to anti-bribery/anti-corruption/anti-kickback, anti-money laundering, human rights, labor rights, sanctions and export restrictions. This commitment to integrity and compliance is reflected in and required by our Code of Business Conduct.
- b. Do not offer, pay or accept bribes, kickbacks or other improper payments in connection with Methode business. Such improper payments are prohibited whether made directly or indirectly, such as to a related party or through an intermediary.
- c. Never offer, promise, provide, solicit, authorize, or accept anything of value directly or indirectly through any third parties to or from a government official or any other person for the purpose of improperly influencing the recipient's actions or decisions to obtain or retain business or secure any improper advantage.
 - i. "Anything of value" literally means anything. For example: money, gift cards, jewelry, meals, travel, donations to a favored charity, entertainment, and offers of employment.
- d. Avoid conflicts of interest and promptly disclose any actual, potential, or perceived conflicts of interest in accordance with the Code of Business Conduct and disclosure procedures. A conflict of interest exists when a private interest interferes in any way, or even appears to interfere, with the interests of Methode.
- e. Hire only for legitimate purposes, based on objective qualifications, and not in exchange for an improper business advantage.

2. All company records must be truthful, accurate and complete.

- a. Make sure that all transactions, including expense reports and uses of petty cash (to the extent permitted by policy), are accurately and completely recorded in Methode's books and records in accordance with Methode policies (no undisclosed or unrecorded accounts or transactions).
- b. When conducting business transactions, specify and document all products, services and items of value exchanged with a third party in writing (no undocumented side transactions).
 - i. "Third party" means anyone who is not employed by Methode, including any business partner, contractor, supplier, vendor, customer, reseller, distributor, consultant, public or government official, etc.
- c. Do not use personal funds for any payment or activity prohibited by this Policy.
- d. Report time worked accurately in approved time-keeping systems.
- e. Follow all applicable standards, principles, laws and company requirements for accounting and financial reporting, and external reporting or interactions with government regulators.

3. When interacting with government officials, be careful and truthful, and use authorized Methode communication channels.

- a. Ensure that all communications with public officials or government officials or agencies are accurate and truthful.
- b. Do not communicate or interact with public or government officials for Methode, directly or indirectly, unless you are specifically authorized to do so and your job includes government interactions. Do not allow any representatives to communicate or interact with public or government officials for Methode unless they have been engaged or authorized to do so by the corporate Legal department. Seek guidance from Compliance if you are contacted by government officials.
- c. Follow the Global Authority Matrix with respect to government interactions. Report to Compliance any contracts, agreements or proposals involving government interaction at any value before negotiating or signing.
- d. Use only authorized Methode channels, such as email, for written communication with public or government officials. Do not use messaging apps to communicate with government authorities.
- e. Make sure government fines and fees are legitimate, with a valid basis for payment, and fully reflected in documents surrounding payments requested or made.
- f. Never provide tips or facilitation payments (also known as "grease payments") in government interactions. Expediting fees may be permissible if an expediting option is published and available to everyone on the same terms (such as when applying for faster processing of a travel visa).

4. Engage with business partners who are selected and committed to do business the right way.

- a. Engage third parties to work for Methode for legitimate business purposes only. Select third parties based on objective qualifications after a thorough selection process and risk-based due diligence.
- b. Follow procurement processes and the Global Authority Matrix requirements with respect to any third party engagement.

- c. Have third parties commit in writing to Methode partner expectations, or to uphold their own equivalent commitments based on their own compliance and governance programs. Seek guidance from Legal regarding what commitments are appropriate for each engagement.
- d. Ensure good contracting practices in commercial transaction terms with third parties. Discounts, rebates, and other price incentives to customers and other third parties should be reasonable, consistent with the market, based on measurable criteria, and accurately recorded in transaction documents. When engaging service providers, restrict subcontracting without Methode approval rights or other protections approved by corporate Legal. Seek guidance from Compliance if unusual requests or transaction structures arise during the course of business.

5. Monitor third party business relationships and seek help to address risks.

- a. When managing and overseeing third party engagements for Methode, ensure that work performed for Methode is consistent with all Methode policies and compliance expectations.
- b. Review invoices carefully and be a good steward of company funds.
- c. Contact Compliance for guidance if you encounter any of the warning signs described in the Red Flags and Risk Scenarios section of this Policy (below).

6. Items of value exchanged with third parties must be for legitimate business purposes only, in accordance with Methode policy.

- a. Follow all requirements in Methode's Gifts and Hospitality Policy. Benefits, such as gifts, meals, travel or entertainment, whether given to or received from a third party, must comply with the following requirements:
 - i. Be made openly and transparently;
 - ii. Never be solicited;
 - iii. Be reasonable in value and appropriate to the occasion and circumstances;
 - iv. Comply with the recipient's local laws, regulations, policies, and rules;
 - v. Be offered for legitimate business reasons;
 - vi. Not give rise to a conflict of interest;
 - vii. Not be used to exert influence or pressure;
 - viii. Not create the appearance of corruption or bad faith;
 - ix. Not damage Methode's reputation (or any other party involved) if made public;
 - x. Be limited to only invitees serving a business purpose; and
 - xi. Be recorded and approved in accordance with the requirements of Methode's Gifts and Hospitality Policy.

All benefits and items of value involving a government or public official must be pre-approved in writing by emailing the Chief Compliance Officer and the giver or recipient's Business Unit or function leader.

- b. Follow all requirements in Methode's Charitable Donations & Political Contributions Policy. Any donations to charities, including sponsorships benefiting qualified charities, must be made in accordance with the Policy. Political contributions by Methode are generally prohibited. Follow the Global Authority Matrix with respect to all charitable donations and political contributions.

- c. Methode policies can be accessed from the Methode Connect home page (connect.methode.com), under the “Policies” tab.

Red Flags and Risk Scenarios.

Be alert for warning signs or “red flags” during third party onboarding and throughout Methode business engagements. Not all red flags are obvious, some examples are:

1. Third party is owned by or has ties to a government;
2. Third party is referred to Methode by a government or public official;
3. Third party or any of its management, directors, owners or points of contact for Methode have a history of misconduct or criminal activity;
4. Credible news report or other awareness of third party involvement in misconduct or criminal activity;
5. Third party business location does not exist where it should;
6. Third party proposes or shows signs of conducting business in violation of applicable law (for example, in a prohibited location or in violation of applicable trade sanctions);
7. Third party proposes boycott, exclusion of certain entities or includes language like “boycott products of Israel” or “blacklist” of certain groups;
8. Third party records related to Methode business are not accurate or complete;
9. Request for payment in cash;
10. Request for payment in different location from where work is done;
11. Request for payment to person or entity not a party to the transaction;
12. Request for payment to a PO box or other anonymous location;
13. Request for payment in advance that is not standard for the transaction, or payment too high for goods or services;
14. Refusal to provide information or answer questions during onboarding process or monitoring; or
15. Something otherwise does not seem right or does not make sense in the business relationship.

Also be alert for potential improper payments disguised or described as something else. Improper payments raising corruption risk can include items described as “donations,” “contributions,” “sponsorships,” “gratuities,” “fees,” “fines,” etc.

Miscellaneous Situations.

1. If you encounter a situation where payments are demanded and health or safety is at risk (such as extortion), prioritize the safety and protection of Methode personnel and property. Report such situations to the site Head of Security, to the Chief Compliance Officer, and to the Chief Human Resources Officer as soon as the situation allows.
2. In the event of business acquisitions or joint ventures by Methode, carry out due diligence regarding compliance with this Policy before any transaction, as well as steps to ensure post-transaction adherence to this Policy.

Questions, Concerns and Resources. If you have questions or concerns regarding this Policy or other Methode requirements, please contact the Compliance department. Always seek guidance before acting if you have a compliance question or concern.

Methode personnel and contractors are required to report known or suspected violations of Methode policies or applicable laws related to Methode business activities. Please Speak Up and report it if something does not seem right. Methode does not tolerate any form of retaliation.

If you believe a violation of Methode policy or applicable law may have occurred, report the situation to any of the following:

1. An immediate supervisor or another manager;
2. Compliance Department, including the Chief Compliance Officer, or Legal;
3. Finance or Human Resources; or
4. Methode Compliance HelpLine (available 24 hours a day, 7 days a week, in multiple languages: www.convercent.com/report)

Violations, or deliberate ignorance, of this or any Methode policy, including the prohibition on retaliation, may result in disciplinary action, up to and including termination of employment or loss of business relationship.