

METHODE ELECTRONICS, INC. ANTI-CORRUPTION POLICY

Purpose

Methode is committed to conducting its business ethically and in compliance with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act (the “FCPA”), the Canadian Corruption of Foreign Public Officials Act (the “Canadian CFPOA”) and the UK Bribery Act 2010 (the “UK Bribery Act”), as well as the anti-corruption laws of the member countries of the Organization for Economic Cooperation and Development’s Anti-Bribery Convention (the “OECD Convention”).

All Methode companies, employees, officers, directors and agents are required to conduct business without engaging in bribery, kickbacks, illegal payments, false invoicing or other corrupt practices. This Policy should be read in conjunction with Methode’s Code of Business Conduct.

This Policy applies to all operations and employees, officers and directors of Methode and its subsidiaries and affiliates, as well as distributors, representatives and other intermediaries acting on Methode’s behalf, both within and outside of the United States. Methode includes Methode Electronics, Inc. and all of its subsidiaries.

FCPA Requirements

All Methode companies, employees, officers, directors, distributors, representatives and agents are required to comply with the anti-bribery and accounting provisions of the FCPA.

Anti-Bribery Provisions. Under the FCPA, it is illegal to promise, offer or give “anything of value” to a “foreign official” for the purpose of obtaining or retaining business or influencing a decision regarding Methode.

The term “anything of value” is broadly interpreted and includes cash, loans, gifts, offers of employment, discounts, use of vehicles or vacation homes, travel expenses, excessive meal or entertainment expenses, home improvements, and political or charitable donations.

The term “foreign official” includes any officer or employee of a foreign government (including governmental departments, agencies and instrumentalities); any officer or employee of a government-owned or government-controlled state enterprise such as a state-owned bank, airline, oil company or telecommunications company; any officer or employee of a public international organization, such as the United Nations, the World Bank, the International Monetary Fund or the Inter-American Development Bank; any person acting in an official capacity for or on behalf of any such foreign

government, government entity or public international organization; and any foreign political party, party official or candidate for foreign political office.

The FCPA prohibits both direct and indirect payments to foreign officials. Thus, a U.S. company can face FCPA liability based upon improper payments made by its agents or other business partners. Accordingly, except as set forth in this Policy, neither Methode nor any of its employees, agents, representatives, distributors or other business partners shall promise, offer or give anything of value on behalf of Methode to a foreign official or to any third person who, in turn, is likely to offer or give anything of value to a foreign official. In dealings with agents, distributors and representatives, Methode personnel are expected to remain alert for possible violations of this Policy and bring such circumstances to the attention of management so that Methode can respond appropriately. Conscious disregard, willful blindness or deliberate ignorance to circumstances that should put an employee on notice of a possible violation is prohibited under this Policy.

If permitted by local law, Methode employees may offer and receive reasonable meals and entertainment and small promotional gifts. These must be reasonable in value and frequency, not lavish or extravagant and directly related to the promotion, demonstration or explanation of products or services. Exchanges of gifts and entertainment must be exercised with care, and in no event may a gift or entertainment be offered, given or accepted unless it (i) is not a cash gift, (ii) is reasonable in value, (iii) is consistent with customary business practices and does not violate any laws or the policies of the other party's organization, and (iv) cannot be construed as a bribe or payoff. Depending on their size, frequency and circumstances in which they are given, gifts and entertainment may constitute a bribe. The key test is whether gifts and entertainment could be intended, or even be reasonably interpreted, as a reward or encouragement for a favor or for preferential treatment. If the answer is yes, they are prohibited under the Methode Code of Business Conduct and this Policy and may violate one or more laws. You should discuss any questions or concerns about gifts, meals or entertainment with your supervisor or Methode legal counsel before acting. All gifts, meals and entertainment must be fully and accurately reported in expense reports and other company records.

The FCPA does, in certain very limited circumstances, allow nominal "facilitating payments" in order to obtain non-discretionary, "routine governmental action," such as expediting a permit to do business in a foreign country or processing visas. The term "routine governmental action" does not include any decision by a foreign official on whether, or on what terms, to award new business to or continue business with a particular party. This "facilitating payment" exception has limited application and is not permitted under certain other anti-corruption laws, such as the UK Bribery Act. Facilitating payments are to be avoided, and no facilitating payment of any kind is permitted under this Policy unless reviewed and approved by Methode's Chief Financial Officer and legal counsel.

Accounting Provisions. The accounting provisions of the FCPA require Methode and its subsidiaries to keep their books, records and accounts in reasonable detail,

accurately and such that they fairly reflect all transactions. The accounting provisions also require that an adequate system of internal accounting controls be maintained at all times. The FCPA prohibits the mischaracterization or omission of any transaction on a company's books or records, or the circumvention of any internal controls. This means that any type of bribe or other corrupt payment (whether to a foreign governmental official, a domestic governmental official, or to a private individual or company) can form the basis of an FCPA violation if misrepresented on the company's books and records. Methode employees must follow all applicable standards, principles, laws and company practices for accounting and financial reporting. All business expense reports must be accurate and complete. No undisclosed or unrecorded accounts are to be established for any purpose. False or artificial entries are not to be made in the books and records of Methode for any reason. Finally, personal funds must not be used to accomplish what is otherwise prohibited by this Policy.

Other Anti-Corruption Laws

Many of the countries in which Methode and its subsidiaries operate have also adopted anti-corruption laws. For example, the Canadian CFPOA prohibits any payment or benefit of any kind to be provided or promised to a foreign government official to obtain or retain a business advantage. Canadian criminal laws also more broadly prohibit other commercial bribery or corrupt payments. The UK Bribery Act also prohibits a broad range of corrupt business practices including bribes to government officials and other commercial bribery. The UK Bribery Act also requires organizations to adopt adequate procedures to prevent bribery. Many countries in which Methode operates are member countries of the OECD Convention. Members of the OECD have pledged to prohibit bribery of foreign officials in international business transactions. Many other local, state and national laws prohibit governmental and commercial bribery. All Methode companies, employees, officers, directors and agents are required to comply with the anti-corruption and bribery laws applicable in their relevant jurisdictions.

Domestic Government Officials

Any offer or payment of a bribe or other corrupt payment to any U.S., federal, state or local domestic governmental official is also a violation of law and a violation of this Policy. The U.S. government, as well as state and local governments, and relevant governmental agencies and departments, have a number of laws and regulations prohibiting business gratuities in the context of procurement and contract administration processes. The promise, offer or delivery to a governmental official or employee of a gift, favor or other gratuity in violation of these rules would not only violate company policy but is also a civil and/or criminal offense. Employees and other Methode personnel involved in acquiring or administering government contracts at any level are required to be familiar with relevant public procurement laws and regulations.

Penalties

The FCPA, the Canadian CFPOA, the UK Bribery Act and other domestic and foreign anti-corruption laws of relevant jurisdictions impose potential criminal liability on

both individuals and corporations. In addition to criminal penalties, the relevant regulatory authority, such as the U.S. Department of Justice or the Securities and Exchange Commission, may bring a civil action against Methode and/or the individual. Those who violate this Policy, the FCPA or any other applicable anti-corruption law will also be subject to discipline by Methode, including possible dismissal for employees.

Things to Remember

- Never offer, give or receive money, or anything of value, to obtain or provide an improper advantage;
- Make sure you know the representatives, distributors and other intermediaries with whom you work, and monitor them;
- Before giving a gift or engaging in customer entertainment or meals, understand applicable legal requirements, our customer's own rules and Methode's policy;
- Make sure business records accurately reflect the true nature of each transaction; and
- Never ignore warning signs or "red flags" that raise suspicions of illegal or improper activity. Report them to your supervisor, company management, internal audit or company legal counsel.

Enforcement of Policy and Reporting Violations

This Policy applies to all operations and all employees, officers and directors of Methode and its subsidiaries and affiliates, as well as all representatives, distributors, agents and other intermediaries acting on Methode's behalf, both within and outside of the United States.

If you are unsure of what to do in any situation, seek guidance before you act. Any employee or other person who has reason to believe that a violation of this Policy has occurred, or may occur, should report this information to the Chief Financial Officer using the contact information set forth below. Alternatively, Methode has contracted with an independent third party that specializes in Help Line Reporting to manage any reporting via a toll free number and web reporting tool. This Help Line has multi-lingual representatives, and is available 24 hours a day, seven days a week. The toll-free U.S. number is: 1-800-461-9330, the International collect call / reverse charges number is: 1-720-514-4400, and the secure web portal is: www.convercent.com/report. Reports to the Help Line can be made anonymously if desired. All incident reports are directed to our Corporate Office for investigation and corrective action if needed. You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. Methode does not permit retaliation of any kind against employees or other parties for good faith reports of suspected violations.

If you have questions or problems concerning this Policy or wish to report a violation, you should contact the Chief Financial Officer at: Methode Electronics, Inc.,

Attn: Ronald L.G. Tsoumas, Chief Financial Officer, 8750 W. Bryn Mawr Ave., Suite 1000, Chicago, IL 60631, Telephone: (708) 457-4051, Email: rtsoumas@methode.com.

December 2019