



2 Our Assets & Property



Responsible disclosure and guarding of information

We disclose financial and accounting details when appropriate, and have the responsibility to guard important information assets and intellectual property.

2-1 | Accounting/Tax/ Financial Reporting



We prepare financial documents in a timely, accurate and appropriate manner, disclosing all accounting and financial reports in accordance with relevant laws and regulations, and generally accepted accounting principles.

- We document and reflect the Company's business activities and economic information including financial statements, expense reports, contracts, internal & external reports and tax filing in a timely, accurate and complete manner based on facts and evidence and accordance with related laws and regulations, accounting principles and internal rules.
- We keep business records in accordance with applicable laws and regulations, and the Company's own internal rules regarding the preparation of such documents.

- We assure that documents and records related to internal and external investigations or audits, as well as pending or potential litigation, be retained properly upon request from our Legal Department and/or any other relevant departments.



For the TEL Group Tax Policy, please refer to the following website at:

<https://www.tel.com/csr/related-policy/>

2-2 | Insider Trading



We do not use material non-public or non-disclosed inside information about TEL Group or any other company, including suppliers and customers, to buy, sell, or otherwise transact in securities of TEL Group or any other publicly traded company.

- We do not make profits by trading securities using material non-public or non-disclosed inside information.
- We do not recommend or suggest to others to buy, sell, or otherwise transact in securities using material non-public or non-disclosed inside information.
- We do not communicate regarding material non-public or non-disclosed inside information to others who might trade on the basis of such information, tip the information to others, or otherwise misuse the information, whether verbally or by any other means.

- Examples of inside information include the following:
 - ▶ Business results or forecasts for a company
 - ▶ Changes in management or board of directors or other governing body of a company
 - ▶ Major new product, product claim or product incident/issue

- ▶ Loss, delay or gain of significant contract, sale or order
 - ▶ Acquisition, merger or divestment
 - ▶ Major developments in litigation cases or in dealings with regulators or governments
 - ▶ Revisions in dividend policy
 - ▶ Issuance of stock and stock acquisition rights, stock buy-back, and stock split
 - ▶ Changes in or dispute with a company independent auditor
 - ▶ Default in debt or bankruptcy filing
- Trading or encouraging others to trade on material non-public or non-disclosed inside information, or giving it to unauthorized parties, is a criminal offense in many jurisdictions. A breach of the applicable laws can lead to fines and/or imprisonment against the individual who passed the information even if he/she does not personally gain.
 - Trading securities through third parties such as family members, friends, and/or agents, is also not allowed.



Insider Trading – the buying or selling of a security (e.g. shares, equities and related derivatives) of a listed company by investors (individuals or legal entities) with access to non-disclosed material information (inside information) about the company. This is prohibited by laws, and the Company is committed to complying with all applicable insider trading laws, rules and regulations.

2-3 | Intellectual Property



We respect intellectual property and protect, manage, and utilize it appropriately.

- We are committed to complying with all applicable intellectual property laws, rules and regulations, and we secure and protect the use of these valuable assets.
- We take precautions to protect our intellectual property and confidential business information.
- We do not use TEL Group intellectual property and confidential business information outside of the office without permission.
- We respect and do not misuse intellectual property and confidential business information of others. We do not use other's intellectual property and confidential business information without authorization or an appropriate license.

- Below are some examples of intellectual property rights:
 - Patent Right · Utility Model Right · Design Right
 - Trademark · Copyright · Trade secret
- We do not discuss or share TEL Group or third party intellectual property and confidential business information in public places, such as airports and restaurants.

- We do not bring to TEL Group any intellectual property and confidential business information of a former employer or other third party, or utilize for the benefit of or disclose to TEL Group any intellectual property and confidential business information of any former employer or third party, without prior written authorization from the former employer or third party and unless necessary to further a business purpose.
- We immediately notify the Company, in the designated manner, when in the scope of our work we create an innovation, invention, idea, design using the physical or technical assets of TEL Group.
- We consult with the designated department before using TEL Group intellectual property, such as trademark or copyright, outside the Company.

2-4 | Information Security



We protect TEL Group confidential business information as well as any confidential business information that is entrusted to the Company by our customers and business partners, and prevent information leakage by maintaining a reasonable and appropriate information management framework and complying with rules concerning the handling and protection of confidential business information including personal information.

- We appropriately protect and manage confidential information such as technical and sales information, and only use TEL Group confidential business information for legitimate business purposes or as required by law.
- We do not misuse or improperly obtain confidential business information from third parties.

- We define the classification of information and scope of disclosure, control such information, and only disclose confidential business information on an as-needed basis and in accordance with company policy. Examples of confidential information are: detailed sales information, business performance targets, key performance indicators, product strategies, new product and technology, pending personnel announcements, manufacturing processes and equipment designs, and contracts with customers.
- We take care not to disclose confidential business information in public places, including taking all necessary steps to protect documents and IT devices away from the workplace.
- We do not disclose confidential information beyond its authorized limits while employed at the Company.
- Upon the end of employment, we must erase, destroy or return electronic files and material objects that contain confidential information, and shall sign written acknowledgement of such action. It is absolutely impermissible to keep the confidential information after the end of employment.

- Below are some examples of methods to prevent information leakage and loss:
 - ▶ Do not open an attachment and/or URL when you receive a suspicious email;
 - ▶ Do not let others know or use your password;
 - ▶ Pay close attention to the companies' devices with confidential information; especially when outside the Company, in transit, etc.;
 - ▶ Ensure any removable TEL Group IT equipment, including devices, are secured when left in the office overnight and are locked away or out of sight when left unattended off premises; and
 - ▶ Do not install software without Company's approval.
- The Company may monitor, record or use any communication made by using the Company's information system (e.g., email and internet) to the extent permitted by local laws and regulations.
- Officers and Employees must immediately report the loss or theft of any TEL Group equipment, or any personal device used to store TEL Group information or any actual or potential incidents of information leakage to the information security department.



For the TEL Group Information Security Management, please refer to the following website at:

<https://www.tel.com/about/riskmanagement/>

2-5 | Personal Data



We respect the privacy of all individuals and confidentiality of Personal Data and handle Personal Data with utmost care and take measures to promote the appropriate handling of Personal Data.

- We comply with each country/region's law, regulations, and internal Company rules regarding Personal Data protection. We collect, use and retain Personal Data on a minimum basis to the extent our business needs and dispose it when no longer necessary.
- We always consider the privacy risks before we collect, use, or retain or disclose Personal Data, such as in a new system or part of a project.
- We endeavor to keep Personal Data accurate and up-to-date.
- We protect the Personal Data we hold by ensuring we have effective safeguards in place so it does not fall into the wrong hands.
- We are transparent with individuals about how we use, disclose or transfer their Personal Data. We also make it easy for individuals to access and correct their information.

- Personal Data is information about any existing individual including the following:
 - ▶ information that can identify a specific individual such as name, date of birth or other descriptors
 - ▶ information that can be collated with other information and can identify a specific individual
- Many of the laws and regulations related to Personal Data are extraterritorially applied; therefore, when handling personal information, it may be necessary to understand and follow not only the laws and regulations in your country, but also the other country/region.



For the personal information protection policy, please refer to your market's specific policies.



If you receive any contacts from outside parties regarding the usage of personal information of TEL Group or data breach, immediately consult with your local Legal/Compliance Department.

2-6 | Company Assets



We do not improperly use company assets for our own personal benefit.

- We rely on company assets to support our work every day. We use computers, mobile devices, information technology hardware and software, vehicles, facilities, intellectual property, supplies and other assets with our care and for legitimate and appropriate business reasons.
- We do not use, waste or take the property of TEL Group out of the Company's facilities without the Company's permission regardless of whether it is tangible or intangible.

- We may not install software that the company purchased on a home PC, or use a company PC for personal purposes.
- Improper usage of company assets (as above) would not only be a violation of the internal rules but could also constitute a criminal offense.
- Below are some examples of assets that are considered company assets.

Tangible	Intangible
Facilities	Software
Equipment	Confidential Information (customer information, market share information etc.)
Raw materials	Intellectual property rights such as patent rights
Office supplies	

