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## Office of Ombudsman: Internal Investigation Process and Investigation Guiding Principles

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The purpose of this document is to provide a general overview of TE’s internal investigation process and guiding principles of TE’s internal investigation program. This document can be read in connection with TEC-01-57 “Reporting and Investigating Misconduct” and applies to all internal investigations overseen by the TE Office of Ombudsman.

### 1. Objective of Internal Investigation and Guiding Principles

#### a. Objective of Internal Investigation

The Office of Ombudsman determines which reported matters warrant internal investigation, and in general, this would include matters that involve potential violation of laws, TE policies or TE Guide to Ethical Conduct (“TE Guide”). The Office of Ombudsman ensures that all such in-scope matters are investigated and resolved fairly and appropriately in a prompt and confidential manner. Matters that are deemed out of scope for internal investigation should be addressed via other appropriate channels, for example by local HR, business or function leadership.

The internal investigation process is essentially a neutral, impartial and objective fact-finding process and, to the extent possible, a conclusion will be reached based upon all relevant information. Upon completion of an investigation, appropriate disciplinary actions and/or other corrective actions (if applicable) will be recommended based on appropriate disciplinary guidelines. Upon alignment with the relevant business or function leadership team, such disciplinary actions and/or corrective actions are executed by that business or function. Often, the post-investigation corrective actions enable TE to make process improvements or otherwise rectify an inefficiency for the benefit of TE or its employees.

#### b. Guiding Principles of Internal Investigation

- i. All investigations shall be conducted in a fair, appropriate, and timely manner.
- ii. All investigations shall be conducted in accordance with applicable local laws.
- iii. All individuals shall be treated with fairness and respect throughout the investigation process.
- iv. Every reasonable effort shall be made to maintain confidentiality and anonymity, to the extent possible, to protect all involved parties.
- v. The investigation team shall conduct all investigations in a professional, neutral, impartial way and in a manner that upholds the values set forth in the TE Guide.
- vi. Any individual who reports a matter based on reasonable grounds or beliefs, or who provides information or assistance with an investigation, shall be protected from retaliation, even if the reported matter is later not validated by evidence.

### 2. Internal Investigation Process

- a. Once a matter is reported, the Office of Ombudsman shall review and determine, in its sole discretion, if the matter warrants investigation. If the reported matter involves

potential violation of laws, TE policies or TE Guide and therefore warrants investigation, the case will be assigned to an impartial investigation team for investigation.

If the reported matter does not warrant investigation, the Office of Ombudsman will inform the reporter of such decision in an appropriate manner. No further investigative actions will be taken by the Office of Ombudsman, and no investigation team will be assigned. If other channels are deemed to be appropriate for addressing a matter, the Office of Ombudsman may also forward the matter to such channels for further review or appropriate action, and inform the reporter accordingly.

- b. To proceed with an investigation, the investigation team shall:
  - i. Inform the reporter that an investigation has started on the reported matter, and provide contact information of the assigned investigator.
  - ii. Gather and review relevant evidence, data and documents, and ensure they are appropriately documented.
  - iii. Interview relevant parties who may have knowledge of the reported matter.
- c. Concluding an Investigation
  - i. The investigation team shall review all evidence obtained during the previous phase of the investigation, make credibility determinations where appropriate and reasonably possible, and ensure that all allegations have been properly addressed.
  - ii. Once the investigation team reaches a conclusion, they shall inform the reporter that the investigation has been completed. Due to privacy and other policy concerns, no investigation details will be disclosed unless required by applicable local law.
  - iii. Where applicable and as mentioned above, disciplinary actions and/or corrective actions resulting from the investigations may be implemented, and the Office of Ombudsman shall assign appropriate individual(s) to monitor implementation of such actions through to completion. However, due to privacy and policy reasons as stated above, a reporter may not be informed/aware of such actions or their implementation.
  - iv. Under certain circumstances, there may not be enough information to allow an investigation to be conducted or allow the investigation team to draw a definitive conclusion. Under such circumstances, if additional details cannot be gathered from the reporter or other sources, the reported matter may be closed due to the lack of sufficient information.

### **3. Additional Considerations**

- a. All employees and those working on behalf of TE, or otherwise working at TE sites, are expected to be truthful and fully cooperate during an internal investigation per TE Guide and TEC-01-57 Reporting and Investigating Misconduct Policy. TE employees who refuse to cooperate or purposefully interfere with an on-going investigation (e.g., by providing false or misleading information, destroying evidence, or disclosing critical information

related to an on-going investigation to others without a need-to-know) may be subject to disciplinary actions.

- b. To ensure adequate information can be gathered by the investigation team, a reporter is expected to maintain open communication and respond to questions from the Office of Ombudsman or the investigation team through various confidential channels. These may include email, phone, or messages via the ConcernLINE/ConcernNET reporting system.
- c. Periodically, after an investigation has been completed, those who provided information or assistance with an investigation may be contacted by the Office of Ombudsman or its delegate through follow-up surveys to monitor whether they have experienced retaliation, and to ask their personal experience with the investigation process. All responses are appreciated and kept confidential. The survey responses need to include sufficient details and/or contact information to enable the Office of Ombudsman to take actions on potential retaliation concerns.
- d. The investigation team shall comply with applicable local laws where the investigation is conducted. In the event a local law conflicts with TE's internal investigation process or procedure, the local law shall prevail.
- e. Certain countries may allow a reporter to utilize alternative external reporting channels to address their concerns. TE respects a reporter's choice in selecting a specific reporting channel, but encourages the usage of our internal reporting channel via the process outlined here.