

PANDUIT Code of Conduct and Business Ethics

Panduit Code of Conduct and Business Ethics Statement

Panduit will, at all times:

- Conduct its business globally in an ethical manner
- Support our Core Values of Quality, Customer Focus, Integrity, Leadership, Initiative and Results Focused, Superior Products, Optimum Systems and Processes, and Teamwork
- Obey all laws in the countries in which we operate
- Interact in a fair, impartial and ethical manner with prospective and current employees, suppliers, customers, partners and communities

All Panduit employees are responsible for maintaining our ethical reputation, and will be protected from harassment if they report suspected or actual unethical behaviors.

At Panduit, we will not accept, or tolerate any behavior that is in violation of our Code of Conduct and Business Ethics.

PANDUIT[®]

infrastructure for a connected world

We Recognize Ethics and Values to Be Key to Our Company's Success

Panduit's Code of Conduct and Business Ethics guides the way we conduct business around the world. This code applies to all Panduit employees. This code cannot provide guidance for every issue, but it is a roadmap to get answers to your questions about situations you may encounter at Panduit. The code is grounded in Panduit's core values, which are the foundation for achieving our mission to create long-term profitable global growth and employee opportunities through earning customer preference.

A. Core Values

1. Quality – We are driven by quality in all of our activities, engaging in a never-ending quest for zero defects in everything we do in order to earn customer preference.
2. Integrity - We are honest, honorable, trustworthy, and ethical at all times.
3. Customer Focus – We engage our customers in dynamic, consultative relationships to provide the solutions they need.
4. Superior Products – Our continuing success is propelled by our passion for research, technology and innovation.
5. Optimum Systems & Processes – We believe our best can always be made better, and relentlessly seek continuous improvement in all of our work and business practices.
6. Initiative and Results Focused – We are dedicated to working hard and working smart and believe that the results we achieve are the only valid measure of our success.
7. Leadership – We believe that our employees are our most valuable resource, and are committed to effectively leading our people and business practices internally in order to lead externally in the marketplace.
8. Teamwork – We work as one unified organization, breaking down barriers and always moving forward to greater successes.

B. We Follow the Law (Laws Always Take Precedence)

We follow the laws of any jurisdiction in which we do business.

C. We are Ethical in Our People Management Practices

1. Legal and ethical hiring – We do not discriminate in our recruiting or hiring.
2. Fair treatment of current employees in accordance with the law – Panduit is committed to maintaining a work environment that is free of discrimination and harassment.
3. Anti-harassment policy (sexual harassment or other) – Panduit does not tolerate harassment of employees.
4. Safety guidelines to protect employees – The safety of each employee is our primary concern. Safety and accident prevention is everyone's responsibility.

D. We are Ethical in the Use of Our Resources

1. Compliance with copyright rules – Improper use of copyright-protected material is prohibited.
2. Appropriate information technology usage – We use our information systems for legitimate Panduit business.
3. Adherence to software and licensing agreements – We only use software that is authorized for each desktop or laptop. Copying of third-party software is prohibited without the written consent of the owner.
4. Environmental safeguarding – We protect the environment through recycling and other programs.
5. Entertainment and expense monies are only used for legitimate business purposes consistent with the law.

E. We Protect What is Ours

1. New products developed by Panduit employees within the scope of their employment are the property of Panduit Corp.
2. Protect Intellectual Property (all forms) – Record sketches, trade secrets, ideas, and other forms.
3. Safeguard printed, spoken, or electronic information – Examples include financial, strategic, operational, and technical information, as well as information regarding titles, names, phone extensions, products, and projects.

F. We are Ethical in Our Relationships (Avoid Conflicts of Interest)

1. We do not engage in any conduct that may be influenced (or appear to be influenced) by personal interests at the expense of Panduit.
2. We proactively disclose any relationships, financial interests, or dealings involving anything of value which we, our family members, or our relatives have with Panduit, our suppliers, customers, or competitors.
3. Serving on outside boards requires management approval. All requests to serve on outside boards should be communicated through management channels.
4. No paid speaking engagements – When a speaking engagement is in Panduit's best interest, Panduit will pay for employees to attend these engagements.
5. Take care in the giving or receiving of gifts, as there are circumstances when any gift giving will be a violation of a local law. When appropriate, gifts given or received should be of nominal value. When there is any doubt, employees should seek guidance from management or the Legal Department.