

Sensata Technologies Anti-Bribery and Anti-Corruption Policy

Effective October 20, 2021

The Board of Directors (the “**Board**”) of Sensata Technologies Holding plc (“**Sensata**”) has adopted this Anti-Bribery and Anti-Corruption Policy (the “**Policy**”) as of the date set forth above. The Board reserves the right to amend or rescind this Policy or any portion thereof at any time.

1. Guiding Principles

We at Sensata conduct our business with integrity, and are serious about our obligation to comply with the anti-bribery laws that apply in all of our locations around the world, including, for example, the U.S. Foreign Corrupt Practices Act (“**FCPA**”), the U.K. Bribery Act, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and other similar laws and regulations. This applies not only to employees, directors, and officers of the company (“**Sensata Personnel**”), but also to the agents and partners who work on our behalf (“**Partners**”).

Bribery harms communities, causes damage to our reputation, and disrupts markets. We are committed to winning customers and selecting business partners based on merit and never because of bribery or other illegal activity. This Policy therefore establishes Sensata’s global standards regarding the prevention of bribery and corruption within our operations. This Policy is intended to make you aware of anti-corruption laws so that you can recognize potential problems and address them appropriately.

The consequences of bribery, or turning a blind eye to suspicions of bribery, whether by Sensata employees directly or third parties in connection with our business, can be serious for you and our Company, and can include fines and criminal penalties.

2. Policy Statement

A bribe is generally defined as something of value offered or given with the intent to persuade a person to perform his or her duties improperly, to reward such improper performance, or to otherwise gain an unfair commercial advantage.

All forms of bribery are prohibited across all Sensata operations, in all of our locations, and in all of our interactions, whether with government or public officials, or private customers, and whether by Sensata officers, employees, agents, or other third parties on our behalf. This means you must not give or offer (directly or indirectly) anything of value to any person (including government officials, employees of government-owned or controlled companies, and individuals in the private or commercial sector) if the payment/gift is intended to improperly influence the recipient in order to obtain business or other favorable treatment for Sensata. You also may not solicit or accept a bribe or kickback.

We do not give or accept cash or cash equivalents, or otherwise give or accept anything of value, to secure an unfair business advantage. We do not make payments or provide any benefit to government officials to obtain business or other favorable treatment or to avoid a fine or penalty. In this regard, we also do not make facilitation payments to government officials to speed up their performance. Furthermore, every officer, employee and agent is obligated to keep books, records, and accounts that accurately and fairly reflect all transactions and disposition of Company assets.

3. Anti-Bribery Concepts

Bribery means offering, providing, seeking or accepting anything of value to improperly influence a business decision or obtain a business advantage. Bribery does not always involve payments in cash. Bribes can take many forms and include things like entertainment, inappropriate discounts, hiring a family member of someone you seek to influence, travel that is unrelated to business, or even making charitable contributions

in order to influence a business decision. Likewise, instructing, authorizing, or allowing a third party to make a prohibited payment on the Company's behalf, ratifying such payment after the fact, or making such payment to a third party knowing or having reason to know that it will likely be given to improperly influence a business decision or obtain a business advantage, is a violation of this Policy and the anti-bribery laws that apply in all of our locations around the world.

The following concepts are essential to understand the prohibition against bribery:

- a. Offering, promising, authorizing, or giving. The act of offering, authorizing, or promising a corrupt payment is a violation of anti-corruption laws and is prohibited, even if no payment is ever made or the payment is refused.
- b. Anything of value. Not all bribes are paid in cash or monetary equivalents. Benefits that could be considered a bribe if offered in exchange for a benefit can also include:
 - Gifts;
 - Meals and entertainment;
 - Travel expenses;
 - Charitable contributions;
 - Internships or job offers or family members;
 - Discounts; and
 - Other business opportunities.
- c. To any person. While virtually all anti-corruption laws focus on bribery of domestic government officials, many countries also have laws that prohibit bribery of foreign government officials and persons in the private sector, or commercial bribery. This Policy prohibits bribes in all forms, regardless of whether the recipient is in the public or private sector.
- d. Directly or indirectly. Under applicable anti-corruption laws, Sensata can be held liable for the conduct of partners and other third parties that are acting on its behalf. That means that even if you do not make an improper payment yourself, you (and the Company) may still be liable and face penalties if you authorize somebody else to pay a bribe, or know that they have done so, or ignore signs indicating that they are likely to pay a bribe.
- e. To obtain an improper benefit for the Company. Improper benefits can include, for example:
 - the awarding or renewing of a contract;
 - a reduction or evasion of taxes or fees;
 - expediting an approval or permitting process;
 - gaining access to non-public information;
 - avoiding penalties or sanctions; and
 - obtaining exemptions from regulations.

4. Books & Records

As a public company, Sensata is also subject to certain accounting requirements. Specifically, the FCPA requires Sensata to maintain books, records and accounts that, in reasonable detail, accurately reflect the transactions and dispositions of that company. In order to comply with these requirements, it is imperative that all Sensata Personnel and Partners maintain complete and accurate records with respect to all transactions undertaken on behalf of Sensata, regardless of value. "Records" includes virtually all forms of business documentation, including accounts, correspondence, memorandums, tapes, discs, papers, books, electronic documents or communications, and other documents or transcribed information of any type. This applies to all payments, not just sums that would be "material" in the traditional financial sense.

5. Enforcement & Anti-Bribery Compliance

The purpose of this Policy is to ensure that Sensata and all employees and partners acting on its behalf fully comply with all applicable anti-corruption laws and continuation of our record in maintaining lawful and ethical dealings in business transactions throughout the world. The consequences of failing to comply with anti-bribery legislation are potentially disastrous for a company and its employees. Failure to comply with this Policy and/or any applicable anti-corruption laws may result in millions of dollars in civil and/or criminal fines against the Company, and can subject any individual employees involved in the misconduct to prosecution, criminal fines, and imprisonment, as well as disciplinary action by Sensata, up to and including dismissal. Note that the FCPA and related laws state that fines and penalties imposed upon individuals may not be paid directly or indirectly by any corporation for which they may have acted.

6. Gifts, Entertainment, Charitable Contributions & Other Considerations

The following rules have been established for all Sensata Personnel and Partners:

Gifts & Entertainment.

- **Sensata prohibits offering gifts in exchange for benefits.** Gifts, entertainment, and other business courtesies (such as meal expenditures) may not be offered or provided to anyone in return for any favor or benefit to the Company or to influence improperly any decision of the recipient. Giving or receiving any payment or gift in the nature of a bribe or kickback is absolutely prohibited.
- **Gifts must be reasonable in value and provided for a business purpose.** Expenditures for meals, entertainment, and other normal business courtesies are permitted provided they are not extravagant and otherwise conform to the laws and customs of the country in which the expenditures are incurred. All such hospitality must be reasonable in amount, must be provided for a bona fide business purpose (such as an all-day meeting where food is required for participation), and must be lawful under applicable local law. Sensata prohibits the payment of any lavish, expensive, or extravagant gifts, entertainment, or hospitality on Sensata's behalf.
- **No requesting gifts.** You must never ask for gifts, entertainment or any other business courtesies from people doing business with the Company.
- **No cash gifts.** Gifts of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) in any amount are prohibited.
- **Code of Business Conduct and Ethics (“Code”).** We never provide or accept gifts or entertainment that is inconsistent with our Code of Business Conduct and Ethics. As further noted in our Code, when we make business decisions on behalf of the Company, such decisions must be based on uncompromised, objective judgment.

Charitable Contributions. The making of improper charitable contributions to or on behalf of foreign officials may also have severe consequences under anti-bribery legislation for the Company and involved employees. All Sensata Personnel and business units must obtain prior approval from the Chief Legal Officer before making a charitable contribution or a donation payment at the behest of a foreign official or to an organization affiliated with a foreign official or a close relative of same. In addition, in no instance may an employee or business unit make a charitable contribution or donation payment that might provide a personal benefit to a government official or that is made to gain a commercial advantage.

Political Parties or Officials. All contributions by or on behalf of Sensata of money or services to political parties or officials thereof or to candidates for political office are expressly prohibited.

Government-Owned Businesses. In many countries it is a common practice for government officials to own or operate business enterprises. While the FCPA and related laws do not prohibit legitimate business relationships with business enterprises owned or controlled by foreign officials, great care must be taken to avoid any association with any such enterprise in circumstances that might constitute an evasion of the anti-corruption laws. For example, Sensata should not award business to, or offer atypical discounts to, a company owned by a foreign official, if the purpose of doing business with that company is to encourage the foreign official (in his or her government role) to award Sensata some kind of benefit.

Facilitating Payments. Facilitating or nominal payments to secure or expedite a routine government action by an official are prohibited under this Policy.

You must seek assistance from the Sensata Legal Department if you have any question as to whether a particular gift, entertainment, business meal or other action may violate this Policy.

7. Using Third Parties.

Under many anti-corruption laws, Sensata can be held responsible for the actions of its partners or other third parties acting on Sensata's behalf. As a result, great care should be taken in the retention of such agents and representatives, and sufficient due diligence must be undertaken to ensure that any such representative does not intend to engage in any improper practices. In determining whether to engage a particular representative, factors such as the representative's reputation and qualifications, the manner and reasonableness of compensation, the relationship, if any, between the owners and employees of the representative and a foreign official, the presence or absence of any secret partners, the willingness of the representative to fully disclose its relationship with us, and the legality of the relationship under local law, must be considered.

No person acting on behalf of Sensata may enter into any transaction with agents, contractors, consultants, lawyers or other persons that is intended or designed to permit such persons to circumvent currency, tax or other laws of a foreign country. Any transaction that has the appearance of permitting any person to circumvent such laws must be avoided. Particular care must be taken in respect to "split payments" (i.e., payments for services that are made outside the country in which the services are performed, other than payments in the country in which the provider of the services is incorporated and has an established presence, or payments inside the country in other than the local currency). Company employees must be conscious of any other "red flags" that may be present or arise. A "red flag" is a fact or circumstance that serves as a warning signal that an intermediary may act corruptly. It is the responsibility of an employee who observes a red flag to either resolve such red flag by further due diligence and investigation or to refer the matter to the Company's Chief Legal Officer. A *non-exclusive* list of examples of red flags is below:

- Rumors regarding unethical or suspicious conduct by an employee, marketing representative, consultant, agent, or other business partner, or by a government official;
- Unnecessary third parties or multiple intermediaries;
- Requests for payments to a third party rather than the consultant or agent;
- Requests for payments in a third country;
- Business in a country with bribery problems (examples of countries with a history of bribery problems include, but are not limited to Nigeria, Kazakhstan, Haiti, Myanmar, Iraq, Guinea, Sudan, Congo, Chad, Bangladesh, Uzbekistan, Equatorial Guinea, Cote d'Ivoire, Cambodia, Venezuela, Argentina, Sierra Leone, Pakistan, Egypt, Ecuador, Bolivia & Kenya); see also the Transparency International CPI Index: <https://www.transparency.org/en/>
- Requests for payments in cash or in a currency other than where the third party is located or the contract is being performed;

- Requests for unusually large commissions or other payments, or payments that appear excessive for the service rendered (in this regard, compensation to third parties must be reasonable according to the level and type of work being performed, and consistent with local laws and industry practice);
- Requests for facilitation or “grease” payments;
- Political contributions;
- Requests for reimbursement of expenses that are poorly documented;
- Incomplete or inaccurate information in required disclosures;
- Refusal to certify compliance;
- Refusal to include anti-corruption provisions in the contract; and
- Lacks experience for the work.

8. Reporting Requirements

All Sensata Personnel and Partners are required to report any conduct or transaction, no matter how seemingly insignificant, that they believe might violate this Policy or any applicable anti-bribery legislation. Such reports may be made to the Company’s Chief Legal Officer or, if the employee or partner so desires, anonymously through the Company’s Ethics Hotline: <https://www.sensataethicshotline.com>. All such reports will be treated as confidential, to be used only for the purpose of addressing the specific issue or problem raised. Such reports will be shared by Sensata management and other authorized individuals only on a need-to-know basis or as required by law. Failure to report known or suspected wrongdoing of which an employee has knowledge could, by itself and depending on the circumstances, subject that employee to disciplinary action.

9. No Retaliation

Sensata prohibits retaliation of any kind against any Sensata Personnel who, honestly and in good faith, reports a possible violation of this Policy or of any applicable anti-corruption law. Sensata Personnel will not suffer adverse consequences for refusing to pay or take a bribe or kickback, or engage in other activities that violate this Policy, even if this results in a loss of business to Sensata.

10. Further Information

Any questions concerning this Policy or any anti-bribery or anti-corruption law shall be addressed to the Legal Department.