Corporate Policy	Title: Global Anti-Corruption Policy		
	Function: Legal		
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	Reviewed: 1/1/2025	Effective: 2/1/2016	Supersedes: FCPA Policy
Preparer: Legal Counsel- Litigation and Compliance	Owner: SVP Legal- General Counsel and Corporate Secretary	Approver: President and CEO	

Global Anti-Corruption Policy

WHAT IS THIS POLICY FOR?

This policy applies to all Belden operations and is designed to ensure compliance with global anti-corruption and anti-bribery laws

WHO IS THIS POLICY FOR?

This policy applies to all Belden associates, subsidiaries and affiliates in all business platforms and in all countries where Belden operates.

Overview

Belden's Code of Business Conduct and Ethics requires adherence to the highest ethical standards and the following of all anti-corruption laws applicable to it in the conduct of its business. The Global Anti-Corruption Policy presented here is intended to supplement Belden's Code of Business Conduct and Ethics. Belden values integrity and transparency and has zero tolerance for corrupt activities of any kind, whether committed by Belden associates or by third parties acting for and on behalf of Belden. Unauthorized payments or acts that create the appearance of promising, offering, giving or authorizing payments prohibited by this policy will not be tolerated. The use of Belden funds or assets for any illegal, improper, or unethical purpose is strictly prohibited.

Belden's Legal Department helps administer and direct our global anti-corruption efforts, however all associates are responsible for understanding and following the rules that apply to them. Belden's Legal Department will provide periodic training on applicable anti-corruption laws to relevant Belden associates. New Belden associates who may encounter issues with such laws will be provided with appropriate online training within 90 days of their employment start date.

Additionally, Belden requires regular training and certification of its Code of Business Conduct and Ethics for all associates.

Any associate or third party who violates this Policy in connection with Belden business will be subject to disciplinary measures, up to and including termination in the case of an associate, or termination of business relations in the case of a third party and, where appropriate, referral of the matter to relevant law enforcement authorities.

Key Definitions

The following definitions are to serve as a guide for some of the words or phrases that could possibly be left up to interpretation. These definitions can be added, removed, or changed as deemed necessary by Belden.

Anything of Value: The use of the phrase "anything of value" means that the applicable law forbids not only money bribes but also bribes constituting such things as: 1. Stock 2. Entertainment 3. Gifts 4. Discounts on products and services not readily available to the public
5. Offer of employment 6. Assumption or forgiveness of debt 7. Payment of travel expenses 8. Personal favors

Bribe: When one party gives or offers another party, either directly or through an intermediary, any reward, advantage or benefit of any kind, in order to influence the making or not making or implementation of a decision or act by the party concerned.

Facilitating Payment: Payments made to secure or accelerate routine government procedures such as to: 1. obtain licenses, permits, or other documents to qualify to do business in a foreign country; 2. process visas or secure customs clearance; or 3. secure police protection.

Gift: A gift is any item of monetary value presented to a Belden associate by a non-Belden associate or any item of monetary value presented to a non-Belden associate by a Belden associate.

Entertainment (including, but not limited to, beverages, recreation, lodging, transportation and tickets) is an event with a specific business purpose.

Government: An agency, instrumentality, subdivision or other body of any national, state or local government, including hospitals or other health facilities which are owned or operated by a government, and including regulatory agencies or government-controlled businesses, corporations, companies or societies.

Government Official/Foreign Public Official: Any officer or associate (including any person nominated or appointed to be an officer or associate) of a government or department, agency, or instrumentality of a government (including a government-controlled enterprise); any person acting in an official capacity on behalf of a government or any department, agency, or

instrumentality of a government; any officer or associate of a company or business owned in whole or part by a government; any officer or associate of a public international organization, such as the World Bank or the United Nations; any officer or associate of a political party or any

person acting in an official capacity on behalf of a political party; and/or any candidate for political office.

Application and Relevant Laws

- GENERALLY
    - Companies may be liable for directly violating as well as knowing of a violation of applicable anti-corruption and anti-bribery laws by its outside agents, consultants, sales representatives or distributors. Knowing includes a conscious disregard – that is, a person ignores the circumstances surrounding the transaction that would make a reasonable person suspicious that a violation may occur. Costs associated with an anti-corruption law violation can be significant. Direct and indirect costs associated with fines, lengthy investigations, and implementing measures to avoid future violations can be in the millions of dollars. Violations also significantly damage reputations and disrupt business.

"Red Flags" that may raise concerns:

- The foreign official has a reputation for corruption.
- Dealing with a third party who objects to providing anti-corruption representations and warranties.
- Dealing with a third party who is known to be related to a government official or who has been recommended by a government official.
- Requests for large or unusual payments or commissions.
- Requests for payments made through non-obvious third parties or to an account located in another country where the payee does no business.
- Unexplained travel or entertainment expenses.
- Any other circumstance raising a suspicion that a bribe may be involved.

Red flags should be investigated before entering into any agreement or before providing payment or thing of value.

    - It is no defense to an anti-corruption violation that bribery is an accepted practice in the foreign official's country.

    - Steps should be taken to update as necessary the Company's accounting systems to ensure proper recording of expenses incurred for certain activities, such as those in connection with travel, entertainment and gifts for foreign officials or

foreign government contracts. Expense reports should contain detailed narratives sufficient to explain the purpose of each expense.

- All contracts with agents, consultants, joint venture partners and distributors should include certifications by such third parties that they are in compliance with anti-corruption and anti-bribery laws, or in the alternative a separate certification should be signed. For more information, see Belden's Third Party Sales Organization Policy.

- As part of its Enterprise Risk Management (ERM) procedures, the Company will periodically assess the effectiveness of its anti-corruption law compliance program. This may include auditing high risk locations, reviewing invoices, expense reimbursements and vendor payment statements to detect any unusual payments, and addressing compliance with the applicable anti-corruption laws in the Company's internal management representation letters.

- U.S. LAW
  - In the United States, the Foreign Corrupt Practices Act of 1977 ("FCPA") prohibits bribery- i.e., the payment of cash or other thing of value (such as lavish entertainment or travel) to obtain or retain business. The FCPA applies to all Belden operations, including those in South America, Asia, Europe and the Middle East.

  - FCPA violations carry criminal penalties: for corporations, a fine of up to $2 million and for individual associates, a fine of up to $100,000 plus imprisonment of up to five years. The U.S. Government may also require disgorgement of up to twice the profits gained through the unlawful act.

  - The FCPA has two parts- a prohibition against bribing foreign officials, and a requirement to maintain accurate books and records and a system of internal accounting controls. The anti-bribery and recordkeeping provisions intersect because the government sometimes prosecutes unlawful bribes on the basis that these are not properly identified in a company's books and records. The FCPA's anti-bribery section prohibits Belden from paying or offering to pay money or anything of value to a foreign official (directly or indirectly through a sales representative or distributor) with the intent of obtaining or retaining business.

  - Many businesses are state-owned or state-controlled (especially in Asia) and therefore their associates are subject to anti-corruption laws.

- U.K. LAW
  - The United Kingdom has passed its own anti-corruption law, the U.K. Bribery Act of 2010. While similar to the FCPA in several respects, it is broader in that it prohibits not only bribery of foreign officials, but also of private individuals (commercial bribery). All Belden associates who are employed by a Belden UK

subsidiary (whether they work in the UK or in other countries) must apply the principles set forth in this policy to all customers- not just to foreign officials- whether located in the UK or elsewhere.

- Individuals may be held criminally liable for violating the U.K. Bribery Act and can incur penalties of up to 10 years imprisonment and/or an unlimited fine, or both. Companies would face a fine which, in certain circumstances, may relate to a percentage of worldwide revenues.

- BRAZILIAN LAW
  - Brazilian anti-corruption law, also known as The Clean Company Act, includes provisions similar to the FCPA and the U.K. Bribery Act. The Clean Company Act prohibits bribes to both foreign and domestic government officials, no matter the intent. If, for example, money was given to a government official that could be considered a bribe, even in the absence of an improper or corrupt intent by Belden, Belden associate, or Belden agent, Belden could be liable under Brazil's anti-corruption law.

  - Only civil and administrative penalties are imposed on companies under the Brazilian anti-corruption law. Fines of up to 20% of the company's gross annual revenue or three times the benefit sought or received from the misconduct can be assessed under this law. Companies may also be subject to debarment from government contracts.

- OTHER ANTI-CORRUPTION LAWS
  - Other nations have enacted anti-corruption laws (including China and India) and the United States and other countries are signatories to several anti-corruption conventions and treaties, including: the United Nations Convention against Corruption and the Organization for Economic Cooperation and Development (OECD) Convention against Bribery. Several countries' anti-corruption laws prohibit bribing and being bribed and go beyond bribery of public officials to include commercial bribery involving non-government parties. For example, the Peoples Republic of China (PRC) prohibits most conduct that violates the FCPA, but also prohibits (like the UK law discussed above) commercial bribery not involving state-controlled entities. Associates should consult with the Legal Department for guidance on these laws and conventions.

Facilitation Payments

Facilitating payments or gifts may be made only if: 1. The assistance requested and for which the payment or gift is made is clearly an action which the person receiving the payment is legally required to provide, and the payment is only to facilitate such action; 2. Such payment is legal and customary in the foreign country in question; 3. No reasonable alternative to making the payment

exists; 4. The duties of the person receiving the payment are essentially ministerial or clerical; and 5. The payment has been approved in advance by the local Company Manager, the Chief Financial Officer, and the Law Department. Approval will be given only after it has been determined that such payment is consistent with the criteria set forth above and with all other applicable laws. In any event, every effort should be made to eliminate or minimize such payments.

Duty to Report

You must report actual, potential, or suspected corruption in Belden or by any individual or organization with whom Belden does business. Failure to do so may result in liability for Belden and for you personally. You must report any request for an improper payment, any indication that a person might be making corrupt payments, or that a person has an intention or plan to violate this policy. You have a similar obligation to report any information or knowledge of any hidden fund or asset, of any false or artificial entry in Belden's books and records, or any payment that circumvents Belden's internal financial processes. Reports must be made immediately. Your report may be made to your manager, the Legal Department, or on an anonymous basis using our hotline. Please view the Speaking-Up Policy for more information on how to report potential violations. If any instance of bribery or corruption is identified, an investigation will take place under the guidance of the General Counsel or his or her nominee. You can also contact the Legal Department or the hotline to seek advice on anti-bribery and corruption issues or to make suggestions for how we could improve our anti-bribery and corruption policy and procedures.

Anyone who reports a suspected violation of this Policy will not be subject to disciplinary action or retaliation for the act of making the report. However, anyone who reports a suspected violation may be subject to disciplinary action to the extent he or she violated any Belden policy or procedure.

Reporting Violations

Global Ethics Hotline:
800-461-9330

Web: www.belden.com/ethics
Email: ombudsman@belden.com

Specific country contact information can also be found on Belden's website.

Owner:
/s/ Brian E. Anderson

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Brian Anderson
SVP- Legal, General Counsel and Corporate Secretary

Approved:
/s/ Ashish Chand

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Ashish Chand
President and Chief Executive Officer

Related Policies

- Code of Business Conduct and Ethics
- Gifts and Entertainment Policy
- Speaking-Up Policy
- Third Party Sales Organizations Policy