

THE TTM CODE OF BUSINESS CONDUCT

INTEGRITY · RESPONSIBILITY · HONESTY

THE  
TTM CODE

OF BUSINESS CONDUCT

INTEGRITY

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RESPONSIBILITY

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HONESTY

# THE TTM CODE OF BUSINESS CONDUCT

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## LETTER FROM THE CEO

Dear TTM Colleagues,

Our core values are so important to our global corporation, TTM Technologies, Inc. ("TTM"), that we have included them in our Vision Statement; to keep us focused on...an **unwavering value system built upon honesty, integrity, performance, excellence and clear communication**. As TTM has expanded globally with sales and operations around the world it is even more important that all of us commit to strive to make TTM a good corporate citizen wherever we do business. Ethical standards that are clearly understood and consistently adhered to are key to that commitment. This Code of Business Conduct is designed to answer the challenging questions that TTM employees may confront in their dealings with fellow employees, customers, suppliers, agents or government officials. The Code is not just about legalities; it is much more than that. It is an integral part of our corporate culture and our way of doing business. TTM expects its employees to adhere to the highest standards of ethical business conduct by following the standards and ideals set forth in this Code in addition to adhering to all applicable laws.



No set of guidelines can ever cover every possible problem we may encounter. This Code is designed to explain how to find assistance for questions an employee may have about TTM's ethical standards and practices in a given situation. If faced with uncertainty about what to do, stop and ask for help. Refer to the relevant section of the Code, speak with supervisors, or, if you prefer, communicate with any of the other points of contact indicated in the Code. Moreover, keep these questions in mind when confronted with a business decision that you believe may have ethical repercussions:

- Am I adhering to the spirit and the letter of the laws or policies that may be involved?
- Would I want my actions reported on the front page of the newspaper?
- What would my family, friends, or neighbors think of my actions?
- Will there be any direct or indirect negative consequences for the Company?
- Are my actions consistent with the overall values set forth in the TTM Statement of Vision, Mission and Strategy and the TTM Code of Business Conduct?

As always, the success and reputation of TTM depends upon the judgment and care of its personnel. It is essential that each and every employee protect our most important asset ... our reputation for integrity.

Thank you for your support in maintaining and building our global reputation by learning and living by our Code of Business Conduct.

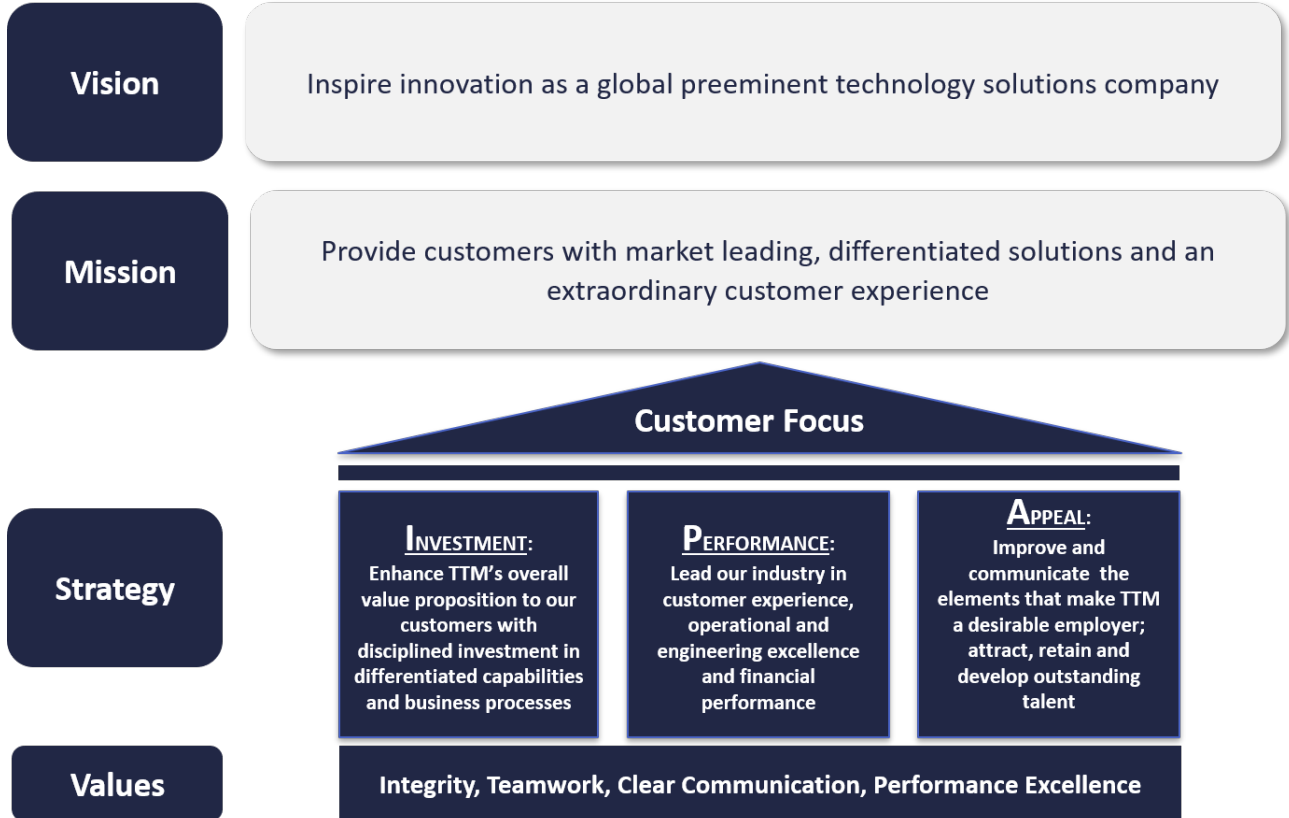
Sincerely,

Tom Edman, President and Chief Executive Officer

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## TTM Strategic Foundation



## TTM'S VALUES

TTM is committed to upholding the highest level of ethical standards and integrity in our work. TTM's reputation for honest and fair business dealings is one of our greatest strengths and living up to and protecting that reputation is the responsibility of each and every member of our global workforce.

Future success depends, in large part, on the continued good judgment of all of our employees.

## PURPOSE AND SCOPE

The purpose of this Code is to set forth the Company's expectation for ethical conduct and to provide guidance for employees. This Code is a public statement regarding our expectations for all persons and constituencies impacted by the Company's business activities.

This Code applies to all employees, temporary workers, officers and directors of TTM Technologies, Inc. ("TTM or the Company") and its affiliated Companies. All third party consultants, partners and suppliers are equally expected to adhere to this Code in all their dealings with or on behalf of the Company. We must ensure that they are aware of the contents of the Code, either by providing them with a copy or by referring them to its dedicated page on our website at <http://connect.ttmtech.com/>

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Although the Company may not be able to require adherence to the Code in every related party, joint venture or third party with which TTM participates or conducts business with, the principles expressed in this document are universal and we should encourage its use in our partner organizations.

Nothing in this policy is intended to prevent any employee from discussing with others, or making a complaint about, their wages, hours, or working conditions, or from engaging in any other legally protected activities. Should an employee have such a complaint, they are encouraged to raise the complaint to their supervisor or the Human Resources Department or through the Company's whistleblower hotline, so that the complaint may be resolved in an expeditious and productive manner.

It is your personal responsibility to read and understand this Code, as well as other Company policies; comply with them both in letter and in spirit; and seek guidance when appropriate.

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## COMPLIANCE WITH LAWS AND REGULATIONS

Our Company employees and third party representatives such as sales representatives, agents, contractors, among others, are responsible for complying with all applicable laws and regulations wherever we do business.

This Code of Business Conduct is designed to reflect – and surpass – the standards for ethical conduct set forth in applicable laws and regulations.

The head of each function of the Company and/or designee is responsible for informing Company management and employees of applicable laws and regulations of the respective functional area, and for providing advice on compliance programs. As this Code impacts a broad range of Company activities and is intended only as a general statement of policy, separate policies will be issued from time to time to provide guidance related to specific circumstances.

## RESOURCES FOR EMPLOYEES

TTM is dedicated to providing its employees with the tools they need to make ethical business decisions. This Code is extensive – but it cannot address every situation that employees will face. The Company relies on its employees to exercise good judgment and to seek help when they have questions or concerns that are not addressed in this Code.

Employees are required to review, understand, and abide by the Code. Management personnel are required to affirm that they have read and understand the Code in the annual certification process. In addition to this Code and related policies, employee training may be conducted to address other specific issues.

### *What if I have a concern with a section of this Code or reservations about completing my annual certification?*

If you have an issue with a section of this Code or annual certification, please discuss your concern(s) with your supervisor, your Human Resources representative, or any executive of the Company. Even if you fail to complete your certification of this Code, you are still obligated to follow the policies contained in it. Failure to complete the annual Code certification may result in disciplinary action, up to and including termination of employment.

## CONDUCT IN THE WORKPLACE AND MARKETPLACE

TTM is guided by the principles of non-discrimination, respect for human rights, and individual freedoms. Mutual respect is central to a harmonious and productive workplace, where the rights of employees are upheld. All employees have a right to work free of intimidation, discrimination, or coercion of any kind.

Our global economy is based on the principle of a free and competitive market. To make sure that this principle carries over to the marketplace, most countries have laws prohibiting business practices that interfere with competition. These laws are designed to prevent businesses from setting prices to keep competitors out of the market, employees from trading nonpublic information for their own benefit, and anyone from offering bribes or other corrupt payments to obtain an unfair advantage.

The Company abides by these laws, and employees must avoid conduct that violates or appears to violate these laws. The following section of the Code sets forth the basic principles that employees should follow to respect and surpass the standards set forth in applicable laws. Please contact the Company's Human Resources department with any questions about how these laws apply to you.

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## EQUAL EMPLOYMENT OPPORTUNITY AND ANTI-DISCRIMINATION

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The Company is committed to equal opportunity hiring and promotion practices. All hiring and promotion decisions will be fair and based on talent and merit only. All employees are entitled to respect, as well as to evaluations and promotions that are based on their contributions to the Company. The Company and its employees will strive to achieve and maintain this positive work environment.

TTM values diversity in our workforce, as well as in our customers, suppliers, and others. We provide equal employment opportunity for all applicants and employees. TTM does not discriminate on the basis of race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic to the extent required by local law, regulation, or ordinance.

TTM follows these principles in all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, termination, and social and recreational programs.

## HUMAN TRAFFICKING, CHILD AND FORCED LABOR

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The Company prohibits employment of any person under the age of the applicable local statutory minimum age limit for employment, or the age for completing compulsory education. Employees under the age of 18 shall not work in positions that may be subject to hazardous conditions or may jeopardize the health and safety of a minor.

TTM does not tolerate forced, debt bonded, indentured labor practices, or human trafficking. TTM does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment.

TTM supports the use of legitimate workplace apprenticeship, internship and other similar programs that comply with all laws and regulations, applicable to such programs.

## PERSONS WITH DISABILITIES

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The Company is committed to working with and providing reasonable accommodation for employees and applicants with physical or mental disabilities. Disabled employees are encouraged to provide notification from their doctor describing any restrictions on their ability to perform the essential duties or functions of their job.

## WORKING HOURS

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The Company complies with the applicable local practices for working hours.

## COMPENSATION AND BENEFITS

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The Company compensates employees fairly and complies with applicable local employment standards, practices and conditions including but not limited to minimum wage, leave and holiday pay.

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## FREEDOM OF ASSOCIATION

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TTM recognizes that in many of the locations where we operate, employees have the right to freely associate or not associate with third party organizations in accordance with local laws. TTM is committed to treating our employees with dignity and respect, and creating an environment of open communication where employees can speak with their managers about their ideas, concerns or problems, and team together to address workplace issues.

## ANTI-HARASSMENT

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The Company does not tolerate workplace harassment of any kind. This includes threats, intimidation, bullying, subjecting individuals to ridicule or unwarranted exclusion, and sexual harassment (which may include unwanted sexual advances, sexual jokes, subtle or overt pressure for sexual favors, innuendos, and offensive propositions).

Every employee is expected to support this policy and to report any such behavior or concerns particularly when it relates to their safety or the safety of their colleagues. Any supervisor observing or knowing of a harassing situation shall take immediate action to stop it. Supervisors and Human Resources personnel who receive reports of harassment are expected to seriously consider all such complaints and take immediate steps to investigate and take action in accordance with this policy and any other related company policy. When the Company believes that harassment or violence has occurred, appropriate disciplinary action will be taken against those responsible, up to and including termination of employment.

***What if the person harassing me is my supervisor? If I complain, could I lose my job?***

No, you will not lose your job because you make a complaint and you are entitled to work in an environment that is free from intimidating, hostile or offensive behavior. Contact Human Resources for help.

## VIOLENCE IN THE WORKPLACE

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The Company is committed to providing a safe work environment for all of its employees and does not tolerate any type of workplace violence committed by or against employees. All employees are prohibited from doing any of the following while on Company property including its parking lots:

- Causing physical injury to another person;
- Making threatening remarks;
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress;
- Intentionally damaging Company property or property of another employee or third party on TTM's property;
- Possession of all firearms, knives, and/or any weapon whether used for hunting, protection, or any other purpose unless such prohibition is specifically not allowed by law; and
- Committing acts motivated by, or related to, sexual harassment or domestic violence.

Any potentially dangerous situation must be reported immediately to a supervisor or the Human Resources Department. Reports can be made anonymously via the hotline and all reported incidents will be investigated. Employees who violate this policy can be subject to discipline, up to and including termination of employment.



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## DRUGS AND ALCOHOL

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The Company is committed to providing a work environment free of illegal drugs and alcohol. Substance abuse poses health and safety risks both to the abuser and to his or her fellow employees.

## ENVIRONMENTAL HEALTH AND SAFETY (“EH&S”)

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A number of environmental laws, standards, requirements, and policies apply to TTM’s worldwide business operations, practices, and products. TTM has a responsibility to understand and follow these requirements, including:

- Conserving energy, water, raw materials and other natural resources,
- Managing materials and wastes properly, and
- Complying with environmental permits and health and safety requirements.

TTM is committed to protecting, maintaining and promoting the environment as well as the health and safety of our employees and the community in which we operate. All employees are expected to be familiar with Company EH&S policies, procedures and practices. Furthermore, employees must:

- Take responsibility for our environment, personal health and safety and that of their co-workers;
- Identify hazards, assess risks and then, whenever possible, initiate corrective action and bring the matter to the attention of management; and
- Promptly report EH&S incidents (such as spills, non-compliant emissions, occupationally-related injuries and illness, etc.) to local management to permit investigation of causes and initiation of corrective and preventive measures.

TTM supports a precautionary approach to the materials used in our products and strives to reduce and minimize the use of hazardous materials in order to optimize the environmental impact of our manufacturing technologies.

TTM expects our suppliers and others to comply also with all applicable environmental, health and safety laws and standards in their operations.

## PRIVACY

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The Company respects the privacy rights and interests of all its employees and provides safeguards for the protection of its employees’ personal information that is collected, held, and used. Everyone must respect the privacy rights of coworkers and handle all employees’ personal information in accordance with the Company’s applicable electronic communications and security policies which are generally available on TTM’s intranet and will be periodically updated.

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## ELECTRONIC AND DIGITAL COMMUNICATIONS

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All electronic and phone communications equipment and systems, and all information, including email transmitted, received, or stored in Company systems, are property of TTM. You should use such Company equipment for job and business-related purposes. Personal usage of TTM's equipment such as phone and e-mail should be kept to a minimum.

To ensure that the use of electronic and phone communications systems and business equipment is consistent with business interests, TTM reserves the right to enter, search or monitor computer files and email files at any time and without advance notice. You have NO RIGHT OF PRIVACY in your use of any TTM's electronic and phone communications systems or business equipment. All access codes and passwords are the property of TTM, and must be surrendered upon request by the Company.

Under no circumstances are you permitted to use TTM's computers or systems to view, download or distribute inappropriate content, including but not limited to content that is illegal, fraudulent, defamatory, offensive, derogatory, pornographic, or otherwise considered inappropriate in a business environment. TTM reserves the right to inspect and monitor, at any time and without advance notice, any incoming or outgoing correspondence received or sent by an employee to or from the Company premises or with Company equipment or resources, including but not limited to email, text messages, facsimiles, or hard copies.

Any duplication of copyrighted software, except for backup purposes, is a violation of federal copyright law. In accordance with this law, the software that is loaded onto your hard disk may not be duplicated for use on any other computer without authorization from the Company. Employees must also refrain from downloading any software on Company equipment. Only Company owned or leased hardware is allowed on TTM networks. Only the IT Department is allowed to load software on Company issued equipment. If you have a business or work-related need for a certain type of software that is not on your equipment, you should consult your local IT Department. Employees should not attach any type of personal external storage devices, such as thumb drives/hard drives/USB sticks, to the Company's equipment. If a business need arises for use of such devices, contact your local IT Department.

All employees are required to acknowledge receipt of TTM's Electronic and Digital Communication policy that explains these policies and procedures in more detail. In addition, employees are expected to adhere to new policies that the Company may implement from time to time.

Here are a few procedures you should follow to safeguard Company information stored on computers, mobile devices or other electronic media:

- Lock your screen and device(s) when not in use.
- Do not leave company equipment in a vehicle overnight or in plain sight in the cabin of a locked vehicle.
- Be conscious of others who may observe the screen of the computer system you are using. For example: Use a screen cover when working on proprietary information or handling confidential data while traveling by aircraft or other common carrier where passengers are seated closely.
- Do not share your password with anyone such as co-workers or third parties.
- Change your password(s) as requested by company IT policy.

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## USE OF SOCIAL MEDIA

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TTM recognizes that the lawful and proper use of social media can be a valuable communication tool. However, use of such media by employees, even outside of work, can pose a risk of liability, as well as harm to the business reputation of TTM. For this reason, the Company has developed this policy to provide some basic guidelines for avoiding such risks. As this means of communication continues to grow and develop, TTM reserves the right to maintain flexibility in administering this policy, and to modify it, as needed, to best meet its business needs.

TTM supports employees' rights to use all forms of social media outside of work, on their own time, and using their own electronic communications devices and computers. However, only personnel who are specifically designated and authorized by TTM may communicate on behalf of TTM, whether by electronic means or otherwise.

If in connection with any social media activities, an employee expresses a personal opinion or makes statements about TTM, employees should make it clear that the views expressed are their personal opinions and that they do not represent the views of TTM.

Unless an employee is given permission in writing by an Officer of the Company, they are not authorized to speak on behalf of TTM. As long as an employee remains employed by TTM, information published on social media sites, including an employee's website or blog, or their posts on others' blogs or websites, must comply with all TTM conduct policies, including TTM's policies on employee trading and compliance, anti-harassment and protection of confidential proprietary information. Some obligations of confidentiality remain in place even after employment ends, such as the obligation not to disclose TTM's trade secrets or to disclose the confidential information of its clients. Employees are prohibited from sharing any TTM information that has not been made public by TTM through authorized means.

Your social media activities must not interfere with your job duties at TTM. Your personal social media activities should take place outside of work, and without using TTM's electronic communications equipment or systems as outlined in TTM's Electronic and Digital Communication Agreement.

Employees may be held legally responsible for their actions using social media sites. For example, an employees' actions via video posts, or comments, can be the basis for legal action for defamation, copyright or trade mark infringement, plagiarism or invasion of privacy.

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## PRESERVATION OF CORPORATE ASSETS

Company property is for Company use. Every employee has the duty to preserve the Company's assets, property, facilities and equipment. Employees may not use Company property for their personal use.

Some activities, such as obtaining additional training or education, may have benefits to the Company as well as the individual employee. The distinction between personal and professional use may be difficult to establish in some circumstances. Accordingly, it is important that any use of Company property or services that is not solely for the benefit of the Company be approved in advance by a supervisor.

***What if I write a personal letter or surf the Internet or call a family member on my office phone?***

Generally, limited personal use of Company resources is permitted as long as there is not a significant added cost to the Company and your work and that of your colleagues is not disrupted.

Any suspected fraud or theft by employees must be reported.

## PROPRIETARY INFORMATION & TRADE SECRETS

Non-public, proprietary information and technology, trade secrets, financial and operational plans or data of the Company must be protected and are not to be disclosed to persons inside or outside of the Company except with proper authorization and in accordance with established policies and procedures.

A trade secret can be any financial, commercial or technical information which is valuable to the Company and would be valuable to the Company's competitors if they knew it. Such information might include, but is not limited to: a formula; business and marketing plans; customer specifications; acquisition plans; financial data; plans for or results of research and development; manufacturing methods and procedures; cost figures; potential new products; computer information and software; and special techniques unique to the Company.

No unlawful or improper means may be used to acquire confidential or proprietary information from any competitor, supplier or customer.

Even in social situations, the employee must remember that they represent the Company and their obligation to protect Confidential Information continues. They should not share Confidential Information with friends, family or former colleagues.

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## ANTITRUST AND UNFAIR COMPETITION

Antitrust laws govern the relationships between competitors and are generally designed to maintain and promote competition in the marketplace. It is a felony to violate antitrust laws, and punishment can result in imprisonment and fines. Violation of antitrust laws can also have a devastating impact to both the Company's and the employee's business reputations.

In order to ensure that the Company is acting independently and in its own interest in all commercial situations affecting the competitive conditions of trade, as well as to avoid practices that restrict competition, employees must observe the following rules:

- Do not enter into any agreement or tacit understanding with our competitors.
- When participating in joint ventures and industry associations involving competitors, limit communications to those actually required for the legitimate business of the activity.
- Deal fairly with all customers and suppliers, including those with whom we also compete.
- Avoid any use of coercion in the sale of products to customers, such as forcing a customer to purchase unwanted products.
- Refrain from using any market power or market information in a way which may restrict competition.
- Avoid any unfair or deceptive act or practice.

Employees of the Company and employees of competitors may from time to time meet, talk and attend the same meetings or events. The Company may sell to or enter into licensing agreements with its competitors or participate with competitors in business or trade shows. Such contacts are neither against the law nor to be avoided, although they require the utmost caution and conformance with the Company's policies and procedures.

***What if my former employer was one of the Company's competitors? Is it OK to talk with my coworkers about some of their sales strategies?***

No. You have an obligation to protect the proprietary information of your former employer, and that obligation does not end when you leave its employ. You should disclose the fact that you formerly worked for a competitor to your manager and be sure to abide by all the obligations of confidentiality owed to your former employer.

***What if I receive a letter in the mail that contains a competitor's pricing data? I can find no indication that it has been sent or received through authorized channels. What should I do?***

Do not read the document and do not share it with coworkers. The letter should be immediately sealed and forwarded to the Chief Financial Officer.

***What if I just realized that some inaccurate information was provided to a customer after price and terms were already agreed upon? Will I be following proper procedures if I notify the customer right away?***

Yes. It would be important for you to contact your finance and sales support team and to work with them to help ensure timely disclosure of the error the customer.

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***I was waiting in the hall prior to a customer proposal meeting and overheard a conversation between a procurement officer and one of our competitors where product specifications and costs were discussed. Can I still participate in the bid process, and, if so, can I use the information to write a similar proposal and send it in with a lower bid?***

The answer is “no” to both questions. You cannot capitalize on this information in any way. You should politely excuse yourself from the meeting, avoid disclosure of the information to anyone connected with the program or the proposal, and contact your department manager or the Chief Financial Officer. It’s likely that you will have to withdraw from the bid team as a means of protecting the Company’s ability to participate fairly in the bid process.

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## BOOKS AND RECORDS

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Business and financial records of TTM (“Company’s Records”) are a vital component in maintaining our high standard of ethical business conduct. Accurate and complete Company Records must be kept by every member of our workforce. It is essential to record and report information accurately and honestly, without misleading, misrepresenting, misinforming, making false statements or omitting important information. The following activities are prohibited by our workforce:

- Making payments without supporting documentation or for a purpose other than that described in supporting documentation;
- Establishing undisclosed or unrecorded TTM funds, assets or liabilities;
- Making false or misleading entries in, or omitting important information from, the Company’s Records;
- Seeking reimbursement of personal expenses that are not reasonable business expenses or using TTM’s assets or opportunities for personal gain; and
- Failing to comply with generally accepted accounting principles.

TTM does not tolerate dishonesty, including false recordkeeping. Do not in any way falsify, omit important information from, or tamper with, TTM’s books and records, or even consider doing so. If you are aware of or suspect false recordkeeping or representations by others, you must report such activities promptly to your manager, the CFO, the Business Unit President, Internal Audit or TTM’s ethics hotline. We require that:

- A strong and comprehensive system of internal accounting controls is maintained at all locations;
- Company employees cooperate with internal and external auditors in the course of any audit or investigation; and
- To the extent practicable, contracts to which the Company is a party should be in writing, leaving as little uncertainty as possible.

For more information about the Company’s standards for financial records, please see the Company’s Records Retention Policy which is posted on the Company intranet and will be periodically updated.

## CONFIDENTIAL INFORMATION

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TTM maintains and enforces a very strict confidentiality policy to protect TTM’s and its customers’ proprietary, confidential and trade secret documents, products and information. Confidential information may include various kinds of hard copy and electronic information, but certainly includes internal, non-public, proprietary or secret information related to the Company’s existing and prospective business. Selected human resource and personnel information, such as compensation and health benefits information, must also be kept strictly confidential and used only for the purpose for which it is intended.

Your employment places you in a position of trust and confidence with TTM. Therefore, it is your responsibility to maintain the Company’s proprietary information and to take whatever steps are reasonably necessary to prevent unauthorized disclosure of such information and materials. Specifically, proprietary or personnel data information should not be revealed to anyone who does not need it in the course of performing his or her employment duties for the Company. All employees are required to execute a Confidentiality and Proprietary Rights Agreement as a condition of employment.

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## INTELLECTUAL PROPERTY

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Organizational assets include not only tangible and real property, but also intellectual property or “IP”. IP is proprietary business or technical information. IP is protected by patent, trademark, copyright, or trade secret laws. It is in TTM’s interest to protect and maintain its IP, to do nothing to jeopardize its value, and to be positioned for maximum return of its use or purchase. Details regarding TTM’s policies on IP are set forth in this Code and other applicable policy which is updated on a periodic basis. In addition, all TTM employees will be required to sign and abide by a Confidentiality and Proprietary Rights Agreement that may be updated periodically.

Just as the Company regards its patents, trade secrets, trademarks and copyrights as valuable assets, employees must respect the valid IP rights of other companies and persons. When TTM desires to receive, use or purchase the IP of another party, the legitimate boundaries of such property should be identified and appropriate legal counsel obtained for any proposed course of action. The Company will not knowingly infringe on another’s patents, trademarks, or copyrights, nor will it misappropriate others’ trade secrets. Procedures for the proper licensing or other permitted use of these assets must be followed by all employees. Of particular importance to day-to-day operations, and something that must be avoided by each employee, is the unauthorized copying of magazine and journal articles, books, computer software or any other copyrighted material.

## LETTERS OF INTENT

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Because the Company wishes to minimize its exposure to unintended liabilities that may result from letters of intent and similar preliminary understandings, all such documents must be approved as required by the Signature Authority Matrix.

## UNAUTHORIZED SIDE DEALS AND SIDE LETTERS ARE PROHIBITED

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It is critical that all agreements entered into by TTM are formally documented. The terms and conditions in an agreement define the rights, obligations, and liabilities of TTM and the other party, as well as the accounting treatment for the particular transaction. Business commitments made outside of the formal contracting process, known as “side deals” or “side letters,” are strictly prohibited. Similarly, you should not make any oral or written commitment that creates a new agreement or modifies an existing agreement without following the process set forth in the Company’s Signature Authority Matrix. If you become aware of any side deal, side letter, or agreement made outside of the required contract approval process, report it promptly to your manager, Business Unit President or see the section on Reporting a Concern in this Code.



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## INTERNAL AND EXTERNAL CONFLICTS OF INTEREST

All Company employees have a duty to avoid financial, business or other relationships which might be opposed to the interests of the Company or might cause a conflict with the performance of their duties as Company employees. Any personal use or sharing of Company confidential information for profit or avoiding loss, such as advising others to buy or sell Company property or products on the basis of such information is forbidden.

You should avoid any relationship, influence or activity that would cause, or creates the appearance of, a conflict of interest. We expect that you will not directly or indirectly engage in activities in which your responsibilities or loyalties to the Company may be compromised. You are expected to make or participate in business decisions based on the best interests of TTM and not based on personal relationships or personal benefit.

It is prohibited for an employee or contractor to work in any position where his or her immediate family member or spouse's immediate family member is in the same reporting hierarchy or has any influence or control over their job evaluation, compensation, or any working conditions. Employees are also prohibited from hiring or influencing the hiring of such family members.

Employees in positions that have overarching company responsibilities (including but not limited to Vice President and above, and General Manager positions) are prohibited from having any family members work at the Company. All employees are required to disclose to their supervisor or HR representative if a family member works for the Company.

Additionally, there are some conflict-of-interest situations that you should disclose and for which you should obtain the written permission of the Chief Executive Officer, Business Unit President, or the appointed designee(s) before proceeding. These include:

- Any consulting or other significant relationship with, or interest in, any supplier, customer or competitor;
- Any personal interest that is competitive with the interests of the Company;
- Any business relationship on behalf of the Company with any person who is an immediate family member of the employee or his/her spouse, or with any company controlled by such a person;
- Any position with an external party such as a service provider, customer, or supplier where the Company has influence or control over the job evaluation or compensation of any person who is a family member of the employee or his/her spouse;
- Any personal sale to or purchase from the Company; and

### ***What if one of my family members works for the Company's customer, competitor, or supplier?***

You must disclose the relationship to your supervisor. The Company needs to know so that appropriate action can be taken to prevent potential conflicts from affecting (or appearing to affect) Company decisions. For example, if your sister works for a supplier and has been involved in procurement activities, and your manager has just informed you that she wants you to join a proposal team looking at bids from various companies, including the one that employs your sister, you must disclose the relationship and seek advice concerning your participation on the proposal team.

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- Ownership of stock or other financial interests in an outside company doing business or in competition with the Company that might adversely influence an employee's responsibilities to the Company are to be avoided by Company employees and their close family members. Employees may invest in broadly distributed stocks of such companies, publicly traded on a recognized stock exchange or over-the-counter market provided that the investment does not exceed one percent of the outstanding stock of the corporation. A Company employee should notify their supervisor in writing if the employee or a close family member owns or has a financial interest in a proposed transaction between the Company and a third party, other than a permitted investment in a publicly traded stock.

- You should avoid any relationship, influence or activity that would cause, or creates the appearance of, a conflict of interest.

We expect that you will not directly or indirectly engage in activities in which your responsibilities or loyalties to the Company may be compromised. You are expected to make or participate in business decisions based on the best interests of TTM and not based on personal relationships or personal benefit.

## *What if I am not sure about whether an activity outside of work poses a conflict of interest?*

You should contact the Human Resources department for assistance. Unfortunately, it is not possible to list all the circumstances that might signal potential conflicts of interest. One of the best ways to gauge whether the activity creates a conflict of interest is to ask yourself a series of questions: Does the activity interfere (or give the appearance of interfering) with the duties that you perform at, or owe to, the Company? Are you, a member of your family receiving improper personal benefits through the activity because of your position with the Company? Does the activity compete against the interests of the Company? If you answer "yes" to any of these questions, the activity may indeed create a conflict of interest and must be disclosed. If you are not sure, the best option is to seek advice.

- In light of the global nature and diverse scope of our business, a potential conflict may arise in areas with which you are not familiar. If you are uncertain whether your activities may constitute a conflict of interest, or even the appearance of a conflict of interest, consult with your supervisor or the Human Resources Department.

## CUSTOMERS AND SUPPLIERS

The Company is committed to developing, manufacturing and delivering products which meet all contractual obligations and the Company's quality standards.

The Company will select and treat its suppliers of products and services impartially and without discrimination. Suppliers will be evaluated on the basis of price, quality, timely performance, commitment and reliability.

The Company seeks to conduct business with suppliers, customers and other third parties who adhere to the same ethical standards. When dealing with third parties, employees have a responsibility to watch for potential ethical violations and report them through proper channels as set forth in this Code, whether they occur inside the Company or through external interactions with customers, businesses, or government officials.

# THE TTM CODE OF BUSINESS CONDUCT

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## ANTICORRUPTION POLICY

The Company is committed to conducting and winning business fairly, honorably, and with integrity. Bribes and corrupt payments are strictly prohibited. The principles embodied in this section of the Code are designed to prevent corrupt activities in any form – be it in the context of interactions with private companies or government entities.

International anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and commercial bribery statutes, prohibit giving anyone, including government officials, the employees of our customers, suppliers, or other business partners, anything of value with the intent of obtaining preferential business treatment. A payment is allowed to facilitate routine government actions, such as granting a license to do business or processing government papers to issue a visa or work permit (commonly referred to as “facilitation payments”) in only those countries allowed by law. Any facilitation payment must be minimal value and requires pre-approval by the Business Unit President.

International anti-corruption laws also prohibit creating inaccurate or false books and records relating to payments to any third party. All transactions involving the Company’s funds or assets must be recorded in reasonable detail and accurately and completely reflect the transactions of the Company.

TTM requires all members of the workforce, and all other persons or agents doing work on behalf of TTM, to strictly comply with the following rules:

- Do not offer, promise or pay bribes or kickbacks to anyone or engage in other corrupt practices while conducting TTM’s business.
- Do not request or accept any bribes or kickbacks from anyone or engage in other corrupt practices while conducting TTM’s business.
- Do not make any offer or payment of anything of value that you believe or even suspect might be for the benefit of a foreign official, government, political party, candidate, public international organization, or employee of a state owned, operated or controlled enterprise without prior, written approval from the Business Unit President.
- Do not ignore corruption warning signs. If you have any knowledge or suspicion of corrupt activity or have been asked to make an improper payment, report it as soon as possible to Business Unit President or through the hotline.
- Do not make or agree to fee arrangements that are inflated.
- Do not make false or incomplete entries in TTM’s books and records.

A violation of the FCPA can result in serious consequences for the individual involved and for the Company. Criminal sanctions for the anti-bribery provisions can include up to a \$2 million fine per violation for the Company, and five years of imprisonment and up to \$250,000 in fines per violation for individuals.

### **Safety Payments:**

In very rare circumstances, a Company employee may deem it necessary to make a payment to a government official to avoid imminent danger, such as a threat to personal health or safety. Such a payment would be made in response to emergency circumstances where, in the best judgment of that employee at the time, such payment was required to be made in order to remove or mitigate the threat or risk of imminent danger. If you need to make the payment immediately to avoid the threat to personal health or safety, you must contact the Chief Financial Officer (CFO) thereafter as soon as practicable. Company policy requires that all transactions be recorded accurately in the Company’s records. If the CFO approves a payment under this section, the responsible person must notify the appropriate finance and accounting manager who must ensure that the payment is accurately recorded. The finance and accounting manager must retain all supporting documentation, including written

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approvals, in the appropriate files. The employee reporting the expense should include sufficient information to make the circumstances and purpose of the payment clear.

If in doubt about the legitimacy of a payment that you have been asked to make or receive, seek the advice of the Company's Legal Department. All employees are required to promptly report any suspected violations to their manager or through the Ethics Hotline program. You can access the hotline at [www.TTMHotline.com](http://www.TTMHotline.com).

## GIFTS AND ENTERTAINMENT

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### *Employees Receiving Gifts, Gratuities and Payments:*

Employees should NOT accept gifts, services, benefits, travel, lodging or hospitality from customers, vendors, agents and suppliers that might influence or appear to influence the employee's conduct in representing the Company, except when the following conditions are met:

- Nominal value. The value of the gift or meal is less than US\$100. Exceptions must be approved by the Company's Chief Executive Officer, Chief Financial Officer or General Counsel.
- Customary. The item is a customary business gift and would not embarrass the Company if publicly disclosed. Cash is never an acceptable gift. Giving or receiving cash is viewed as a bribe or kickback and is always against this policy.
- No favored treatment. The purpose of the gift is not to obtain special or favored treatment.
- Legal. Giving or accepting the gift is legal in the location and under the circumstances where given.
- The gifts provided to any single employee do not exceed \$1,500 annually, unless otherwise approved by the Company's Chief Executive Officer.

This policy does not preclude the attendance of Company employees at business-related social or educational functions, if attendance is approved by an Executive Team member or the Chief Executive Officer, as appropriate, and does not create a conflict of interest. Gifts that do not meet these conditions must be tactfully declined or returned to avoid any appearance or suggestion of improper influence.

### *Gifts, Travel and Entertainment to Customers:*

Gifts, meals, travel and entertainment may be provided to customers in connection with legitimate business or promotional activities if permissible under the laws of the United States, the written local laws where TTM is conducting its business and in TTM's Travel and Expense policy section called General Business Gifts, Meals, Travel and Entertainment. These gifts, meals, travel and entertainment expenses must be reasonable and bona fide expenditures, directly related to the conduct of the Company's business such as the promotion, demonstration or explanation of TTM products or services or the execution or performance of a TTM contract. Such expenses are permissible as long as they do not violate TTM's Anti-Corruption Policy, TTM's Code of Conduct, or written local rules and laws and may be reimbursed if incurred, approved, submitted and recorded in accordance with TTM Policy.

Accordingly, any gifts, meals, travel or entertainment to be given must be:

- **Reasonable in nature, of nominal value and not lavish or extravagant** when measured under the standards of both the country where they are provided and the recipient's home country. The maximum value for a gift is US \$100, unless local law is more restrictive. In all cases, TTM employees should exercise good judgment. For instance, this rule may not be circumvented by repeated gifts or payments of a nominal value which, in the aggregate, are excessive. Context must also be considered. For example, a business meal in the middle of the week in a low cost location should be typical of a business meal in that location. Likewise, a business meal in a high cost location should reflect the cost of a typical meal in that location.

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- **Customary and lawful under 1) U.S law, 2) written local laws and regulations, and 3) any rules and regulations of the recipient’s employer;**
  - **Appropriate to the occasion** and without any appearance of impropriety;
  - **Given openly, i.e.,** not hidden by either TTM employee or the recipient from their respective superiors;
  - **Not in cash or cash equivalent** (such as stocks, bonds, transportation-related cards, phone cards or shopping cards) and whenever possible, paid for with TTM employee’s funds using a personal credit card then submitted for reimbursement to the Company;
  - **Not extravagant or expensive;** luxury goods, expensive alcohol, and collectibles such as coins, artwork, jewelry, and expensive electronics are prohibited;
  - **Not given to any spouse,** significant other or family member of a customer or of an employee of a customer
  - **Given as a token** of esteem, courtesy or in return for hospitality. TTM’s promotional items and products containing TTM Company logo (e.g., coffee cups or other like items) are usually the most appropriate gifts

## GOVERNMENT RELATIONS

Government relations includes all contacts between the Company and governments, government agencies and representatives, in the United States and abroad. Company employees interact with government entities on a

routine basis according to established practices and procedures and taking into consideration highest ethical standards.

### ***What about social gifts to government officials, or relatives of government officials, are these acceptable under the FCPA?***

It is possible that such gifts would not violate the FCPA. The threshold question is whether the gift is being given to corruptly influence the government official in order to gain or maintain business. The larger or more frequent the gifts, the more likely they are not mere social gifts, but rise to the level of prohibited gratuities under the FCPA. You must notify the Chief Financial Officer, Business Unit President, or appointed designee(s) before any gifts are given to foreign officials. In all cases, social gifts must conform to the Company’s gifts and entertainment policies.

The Company will cooperate with every legitimate request for information from government sources to the extent that the materials requested are not protected by attorney client privilege. If a government authority requests information or access to files, which are beyond the scope of statutory disclosure, that matter must be discussed with a Company lawyer before any response is made.

If the request comes from an official with a search warrant, cooperate immediately but contact a Company lawyer without delay.

Never destroy Company documents in anticipation of a request from a government agency. When submitting information to any

authority, the Company must take appropriate steps to protect its confidentiality. In many countries, information in government files is available to the public upon request. While the object of such laws is to promote open and accountable government, this can also allow competitors to obtain information about us.

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The Company must not retain a government employee to perform services except under written contract with the government specifying the nature of services to be provided. Care must be taken so that the service provided cannot be misinterpreted as a means to provide improper payments. Employees are expected to limit the entertainment of government representatives so that it does not compromise – or appear to compromise – the employees, representatives, or the Company in anyway.

For more information about the guidelines for dealing with foreign government officials, please see the Anticorruption policy section of this Code.

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# THE TTM CODE OF BUSINESS CONDUCT

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## INSIDER TRADING

Insider trading is buying or selling shares based on nonpublic information. It is prohibited by this Code as well as federal and state securities laws. Employees are not to buy or sell securities of the Company or of any other company, or buy or sell any property or assets, on the basis of nonpublic information acquired through employment at the Company. Employees are also prohibited from disclosing such information to anyone outside the Company until the information has been publicly disclosed and the securities markets have had an adequate opportunity to consider it. This prohibition applies whether such information comes from the Company or another entity with which the Company has a confidential relationship. Likewise, employees may not buy or sell securities of any company with whom we do business based on nonpublic information.

***What if I become aware of the Company's quarterly earnings release results before they have been publicly announced? May I purchase TTM Company stock, knowing that information?***

No. This information would be considered material, nonpublic information, and the purchase of stock would be a violation of Company policy and a potential violation of federal securities laws. You may purchase TTM stock only after such information is made known to the public.

***My department reviewed a pitch by one of our vendors about a new product that they plan to introduce on the market soon. We agreed that the product would not be useful for the Company, but I think it will be a real breakthrough for other industries and will increase the vendor's or its ultimate holding company's stock price. What if I want to buy stock in the vendor's or in its ultimate holding company? Does that violate the Company's policy on insider trading?***

Yes, it does. You may not buy this stock until information about the new product is known to the public. The fact that the new product is not significant to the Company is irrelevant; what is relevant is that you have information about the new product (and its potential impact on the earnings of the vendor) that the general public does not yet have.

For further information about this topic, please refer to TTM's Insider Trading Policy which can be found on the Company's intranet and will be periodically updated.

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## IMPROPER PAYMENTS

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No illegal or improper payments may be made to employees of the Company's suppliers or customers or to any government officials or employees. Payments to consultants, distributors, agents or other intermediaries must be at prevailing customary rates and for actual, legitimate, services provided. Payments to a Company employee or a member of the employee's family in any form from a supplier, customer or any other party doing business with the Company are strictly prohibited.

## INTERNATIONAL BUSINESS

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The Company operates on a global basis and is therefore subject to national and local laws and regulations that vary from one jurisdiction to another. Our policy is to comply with the laws wherever we do business.

In particular, employees must:

- Ensure that payments made to agents or distributors are always for services rendered and are reasonable according to the nature of those services;
- Never expand business into a foreign country, where the Company has not previously done business, without discussing it with management and a Company lawyer;
- Be aware of dealings with countries that are involved in conflicts or that are subject to international sanctions;
- When involved in exports, observe all regulations that govern the shipment of Company products and services to the importing country, as well as applicable international trade agreements;
- Be accurate when furnishing information to any person hired to facilitate export or import transactions; and
- Consult a Company lawyer for specific guidelines to deal with cross-border management of Company business (including membership on the boards of directors of companies located in foreign companies).

Without limitation, as a global company, TTM prohibits the use of child labor, and the use of forced, bonded, or indentured labor practices in our operations. Additionally, we forbid harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. We also set expectations for social responsibility in our supply chain. Our vendors and suppliers are expected to comply with TTM's Code of Business Conduct. We expect members of our workforce to seek appropriate guidance when faced with issues and concerns.

## POLITICAL CONTRIBUTIONS

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Neither TTM nor any of its directors, officers, and employees may make donations on behalf of TTM for any foreign or domestic political purposes, including donations made by or on behalf of TTM to any foreign or domestic political parties, party officials and candidates for political office. Moreover, the FCPA and similar laws of other countries prohibit bribing foreign political parties, party officials and candidates for political office, among others, and donations to such individuals or entities could be deemed to be improper payments under the FCPA or the anti-corruption laws of other countries.



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## CHARITABLE CONTRIBUTIONS

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As a good corporate citizen, TTM supports charitable organizations that contribute to the well being of their communities. TTM may establish procedures, consistent with this Policy, to review requests for charitable contributions to charitable organizations on a global basis. Prior to making any charitable donation on behalf of the Company, Employees must submit a written request to the Chief Financial Officer, Business Unit President or appointed designee, describing the charity, the identity of the person requesting the donation, the amount of the proposed donation, and the justification for the proposed payment. The Chief Financial Officer, Business Unit President or appointed designee will conduct due diligence to ensure that the recipient is a legitimate charitable organization and that the proposed payment is lawful under U.S. and written local laws and regulations. If the Chief Financial Officer, Business Unit President, or appointed designee(s) approves the charitable donation, s/he must provide written authorization and notify the appropriate finance and accounting manager who must ensure that the payment is accurately recorded. The finance and accounting manager must retain all supporting documentation, including written approvals.

## NON-RETALIATION POLICY

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TTM is committed to maintaining a culture that promotes the prevention, detection, and resolution of conduct that is unlawful or violates TTM policies.

In order to encourage employees to come forward and report violations of applicable laws and policies, TTM strictly prohibits retaliation, harassment and discrimination against those who report a concern.

TTM will not tolerate intimidating, threatening, coercing, discriminatory or retaliatory conduct against any employee who in good faith:

- (1) Discloses or threatens to disclose information about a situation they feel is inappropriate, or potentially illegal;
- (2) Provides information to or testifies against the alleged offending individual or TTM;
- (3) Objects to or refuses to participate in an activity they feel is in violation of federal and/or state law;
- (4) Is involved in any compliance review or investigation; or
- (5) Files a valid or legitimate complaint or report of a policy or legal violation.

All supervisors are responsible for enforcing this policy. All reports of retaliation will be promptly investigated and will be handled appropriately based upon the results of such an investigation. Individuals who engage in any form of retaliation will be subject to the appropriate and applicable disciplinary process, up to and possibly including termination. An employee may report such matters to his or her direct supervisor, manager, their local Human Resources representative, or any senior manager of the Company. If, for some reason, an employee does not feel comfortable with these reporting methods, reports can be made to an Officer of TTM or the TTM Ethics Hotline.

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## ASK QUESTIONS AND REPORT CONCERNS

Maintaining our reputation for ethical behavior depends upon all of us working together to make ethical decisions. It is important that any ethics-related concern or issue be brought promptly to the Company's attention so that it can be appropriately addressed. Remaining silent while aware of inappropriate or unlawful conduct is simply not acceptable.

## REPORTING A CONCERN

All employees have a responsibility to promptly report any issue or concern that they believe, in good faith, may constitute a violation of this Code or Company policy. If you become aware of activities that are improper, prohibited by the Code, or possibly illegal, it is your responsibility to report those activities to the Company.

There are several options available to you for voicing your concerns.

- Start by talking with your supervisor or Human Resource Business Partner. Since they may be your closest link to an issue, they can act as a good resource to resolve any potential problems.
- Report to the next level management or management outside your department. Employee may also use the Ethics Hotline, an anonymous third party hotline system designed to make it as convenient and comfortable as possible to send questions, concerns and comments confidentially to the Company's senior management. The Ethics Hotline message system is available 24 hours a day, 7 days a week, and reports can be made anonymously. Independently report issues via the Internet at [www.TTMHotline.com](http://www.TTMHotline.com). Telephone options are available on TTMConnect or the hotline website: [www.TTMHotline.com](http://www.TTMHotline.com).

This Code strictly prohibits retaliation against employees who report improper conduct. For more guidance, refer to the section on Anti-Retaliation in the Code. The Hotline is managed by a third party provider and is strictly regulated, which means your identity will not be known to the Company without your consent. All non-anonymous calls will be treated confidentially, if requested, so far as legally possible and consistent with appropriate investigative and follow up action.

### *What if I reported a concern but never heard anything about it?*

Consider whether the matter was reported anonymously. If so, to the extent that outcomes can be reported, there may not be a mechanism for getting back to the anonymous reporter. Also, all matters will be investigated appropriately, but it is generally not appropriate for the review to be communicated in light of privacy and confidentiality issues.

The Company will promptly and thoroughly investigate all allegations of breaches of this Code and any other Company policies, as appropriate. If your cooperation has been requested during an investigation at TTM, whether conducted internally or at the request of an outside authority, you must cooperate and be honest and thorough in your responses. If you are required to participate in an investigation, we ask that you not disclose the existence of the investigation or any information you learn or discuss during that investigation, and that you also respect TTM's policies regarding the confidentiality of Company business information.

TTM acknowledges that making false reports or pursuing personal vendettas through the hotline is strictly against our value of integrity and you could be subject to formal disciplinary action if you use the hotline in this way.

You must never conceal wrongdoing or permit or request others to do so. If you have any questions or concerns about your responsibilities, please contact your legal department or the Vice President of Internal Audit.

# THE TTM CODE OF BUSINESS CONDUCT

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## **DISCIPLINARY ACTIONS**

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The Company will take appropriate action against any employee, agent, contractor or consultant whose actions are found to violate this Code or any other policies of the Company. Violations of this Code of Conduct or applicable laws are subject to disciplinary action which can include reprimand, probation, suspension or termination, as well as legal action if appropriate. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible. Where laws have been violated, the Company will cooperate fully with the appropriate authorities.

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