METHODE SUPPLIER CODE OF CONDUCT

OVERVIEW

Methode Electronics and our subsidiaries, collectively "Methode Electronics," are committed to high standards of legal and ethical business practices, and we expect the same of our suppliers. To ensure that our suppliers conduct business with a high degree of integrity and in a responsible manner, each of Methode Electronic's suppliers and their representatives, employees, agents, suppliers and subcontractors, collectively each a "Supplier," are expected to adhere to this Supplier Code of Conduct. Suppliers should conduct all necessary inquiries to confirm compliance with this Code, and remediate any issues in a prompt and responsible manner. We expect our Suppliers to be open and communicative with Methode Electronics at all times about the subjects covered by this Code.

COMPLIANCE WITH LAW

Compliance with the law is the foundation of our ethical standards. Supplier shall comply with all applicable national, state, provincial and local laws, ordinances, rules and regulations, including those relating to the manufacture, labeling, transportation, importation, exportation, licensing, approval or certification of goods or services, environmental matters, data protection and privacy, wages, hours and conditions of employment, subcontractor selection, anti-discrimination, occupational health/safety and motor vehicle safety.

FAIR DEALING

Methode Electronics is committed to fair and honest business dealings. Supplier shall not take any unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice. Supplier shall not engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities. Conflicts of interest are to be avoided.

HEALTH AND SAFETY

Supplier shall at all times maintain safe and healthy work environments for its employees and representatives. Violence and threatening behavior are not to be tolerated. Suppliers are expected to provide working environments that support accident prevention and minimize exposure to health risks. Suppliers are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate. Appropriate emergency preparedness plans and procedures shall be maintained at all times.

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LABOR AND EMPLOYMENT PRACTICES

Supplier shall strive to maintain at all times the dignity and human respect of its employees. Supplier shall not produce any of its goods or services with the use of forced or indentured labor, prison labor, slavery or human trafficking. Supplier shall employ workers of minimum legal age in accordance with all local, state and national laws and regulations. All child labor laws must be observed. Supplier shall not engage in abusive employment practices or any forms of physical or mental abuse or coercion, or tolerate the harassment of any of its employees. Workers should not be required to surrender passports or other government-issued documents as a condition of employment. Supplier shall recognize and respect the rights of workers under applicable law to form, join and organize trade unions and to bargain collectively. Supplier shall compensate all employees in accordance with applicable local, state and national laws, including minimum wage laws, overtime laws and employee benefit laws. Supplier shall not exceed any applicable daily and/or weekly maximum working hour requirements. Appropriate means for employees to report concerns without reprisal shall be provided.

ENVIRONMENTAL PRACTICES

Methode Electronics encourages environmentally responsible and sustainable business practices. Supplier shall strive to minimize unnecessary detrimental impacts on the environment. Supplier shall maintain all required environmental permits, approvals and registrations, and we expect our suppliers to be proactive in promoting energy and water conservation, eliminating or reducing waste and hazardous air emissions, and recycling or reusing materials as appropriate. Supplier shall manage, handle, store and transport all hazardous chemicals and substances in a safe and legal manner. All packaging and shipping materials and methods shall be environmentally responsible.

NO BRIBES OR KICKBACKS

Supplier shall conduct business without engaging in corrupt practices such as bribery, kickbacks, extortion, embezzlement, false invoicing or other corrupt practices. Supplier shall not directly or indirectly influence or seek to influence objective and just business practices by giving, asking for or accepting any money, goods, services or other things of value. Supplier shall be committed to conducting all business based on the principle of "fair dealing" and shall establish and maintain systems and processes to ensure that neither it nor its directors, employees, agents, distributors or representatives accept or pay any kickbacks, bribes or other corrupt payments or receive any improper commissions or personal benefits. Supplier shall maintain transparency and accuracy in all recordkeeping.

ANTI-CORRUPTION STATUTES

Supplier shall comply with all applicable anti-corruption laws, including, without limitation, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, and neither it nor any of its subcontractors, vendors, agents, distributors or other associated third parties shall engage in any form of commercial bribery, or directly or indirectly provide or offer to provide anything of value to or for the benefit of any official or employee of a governmental authority or of any government-owned, government-controlled or government-affiliated entity to obtain or retain

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any contract, business opportunity or other business benefit, or to influence any act or decision of that person in his/her official capacity.

CONFLICT MINERALS

Methode Electronics fully supports the goals and objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"), which aims to reduce violent conflict in the Democratic Republic of the Congo (the "DRC") and adjoining countries by providing transparency regarding the use of certain minerals that may finance or benefit armed groups in the region. These minerals include columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State. To support compliance, Supplier shall exercise due diligence on its supply chain as contemplated by the Act and, as appropriate, mitigate the use of conflict minerals in support of violent conflict and human rights abuses in the DRC and surrounding areas. Supplier shall make available to Methode Electronics at regular intervals, as requested by Methode Electronics, the results of Supplier's supply chain evaluations in format acceptable to us, and shall have in place appropriate policies to monitor its supply chain and support our compliance with the Act.

CONFIDENTIAL INFORMATION

We expect Supplier to take reasonable steps to maintain the confidentiality of all proprietary and nonpublic information entrusted to it by or on behalf of Methode Electronics. Supplier shall protect our confidential information against misuse or unauthorized disclosure with at least the same degree of care it uses to protect its own confidential information, and in any event a reasonable degree of care. Supplier shall not use any of our confidential, proprietary or nonpublic information for its own benefit or to our detriment.

NO DISCRIMINATION

Methode Electronics is firmly committed to diversity and equal opportunity in employment and business practices. Supplier shall not engage in or support unlawful discrimination based on race, national origin, gender, physical disability, age, religion or any other basis prohibited by law. Supplier is expected to comply with all applicable laws concerning discrimination in hiring, employment, contracting and other business practices.

BOOKS AND RECORDS

We expect Supplier to keep and maintain accurate and complete books and records reflecting its business transactions. Falsification of records or misrepresentations are unacceptable.

AUDITS

We expect Supplier to audit and confirm its compliance with this Code, and promptly remediate any noncompliance. We reserve the right to independently audit or investigate Supplier from time to time in appropriate circumstances to verify compliance, and Supplier shall cooperate in all reasonable respects with respect to any such audits or investigations. Further, upon

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reasonable request, Supplier shall certify to us whether it is in compliance with the terms and conditions of this Code, and if not, describe the actions it is taking to remediate any issues. We reserve the right at all times and in appropriate circumstances to terminate any Supplier that does not operate in a legal, ethical or responsible manner.

CONTACT INFORMATION

For any questions or comments concerning the Methode Supplier Code of Conduct, please contact your buyer.

NON-COMPLIANCE REPORTING

We encourage our suppliers to alert us to any violations of the Methode Supplier Code of Conduct. We have contracted with an independent third party that specializes in Help Line Reporting to manage the reporting via a toll free number and web reporting tool. This Help Line has multi-lingual representatives, and is available 24 hours a day, seven days a week. The toll-free U.S. number is: 1-800-461-9330, the International collect call / reverse charges number is: 1-720-514-4400, and the secure web portal is: www.convercent.com/report. All incident reports are directed to our Corporate Office for investigation and corrective action if needed. We encourage our suppliers to provide their name with any report, but reports can also be filed anonymously if desired. If you report a concern or violation, you are encouraged to provide accurate and complete information to permit a thorough investigation or response.

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