KEMET CORPORATION IS A LEADING GLOBAL MANUFACTURER OF ELECTRONIC COMPONENTS THAT MEET THE HIGHEST STANDARDS FOR QUALITY, DELIVERY AND SERVICE. THE COMPANY OFFERS ITS CUSTOMERS THE BROADEST SELECTION OF CAPACITOR TECHNOLOGIES IN THE INDUSTRY ACROSS ALL DIELECTRICS, ALONG WITH AN EXPANDING RANGE OF ELECTROMECHANICAL DEVICES, ELECTROMAGNETIC COMPATIBILITY SOLUTIONS AND SUPERCAPACITORS.
A Message from William M. Lowe, Jr.

Being a part of KEMET means having the courage to do the right thing, that is, making sure our conduct is always shaped by integrity and transparency whether we’re on or away from the job. As a core company principle, this commitment to doing the right thing underlies all of our decisions and actions. Our Global Code of Conduct ("our Code") is a key tool to guide us in our efforts to behave with integrity, so I encourage you to take the time to review it and keep it in mind as a resource when you have questions in the future.

While our Code cannot address every situation we will face, it does provide a firm foundation upon which we can base sound decisions that are consistent with our Mission, Vision, and Values.

We all have a role in making sure our business is conducted the right way and that we always follow our Code, our policies, and the law. As part of our responsibility to ask questions and report concerns, we must familiarize ourselves with the reporting resources available to us.

KEMET has a no-retaliation guarantee. We do not tolerate any retaliation against those who speak up and ask questions or report concerns. When KEMET is aware of anyone engaging in retaliation against employees who report concerns in good faith, they will face discipline, possibly including termination.

Our Vision is clear: We have significant goals, and we must rely on each other – and our Values – to get us where we want to go. The path starts here with our Code.

William M. Lowe, Jr.
Chief Executive Officer
Table of Contents
A Message from William M. Lowe, Jr. ............................................................... 2
Our Mission, Vision, and Values ............................................................... 4
  Mission ........................................................................................................... 4
  Vision ............................................................................................................ 4
  Values ............................................................................................................ 5
1. How Our Code and Our Ethics Apply to Our Business ......................... 7
  About Our Code .......................................................................................... 7
  Our Role in Ethics ...................................................................................... 7
  Our Managers’ Role in Ethics ..................................................................... 7
  Asking Questions and Reporting Violations .............................................. 8
  No-Retaliation Guarantee .......................................................................... 9
  Investigation and Discipline Process ......................................................... 9
2. Ethics in Our Workplace .......................................................................... 10
  Treating Each Other with Respect ............................................................. 10
  Working Safely ........................................................................................... 11
  Protecting Natural Resources ................................................................... 12
  Protecting Privacy ...................................................................................... 14
3. Ethics in the Marketplace ......................................................................... 14
  Avoiding Fraud and Bribery ...................................................................... 14
  Responsible Gifts and Entertainment ......................................................... 16
  Competing Fairly ........................................................................................ 17
  Following Trade Laws ............................................................................... 18
4. Our Commitment to KEMET ................................................................. 20
  Avoiding Conflicts of Interest .................................................................... 20
  Protecting Our Assets ............................................................................... 22
  Protecting Confidential Information ......................................................... 23
  Keeping Accurate Records ....................................................................... 24
  No Trading on Inside Information ............................................................ 26
  Waiver ......................................................................................................... 26
Our Mission, Vision, and Values

Mission
KEMET’s Mission is to help make the world a better, safer, more connected place to live.

Vision
KEMET’s Vision is to be the world’s most trusted partner for innovative component solutions.
Values

We Are…

**Talent Oriented.** We believe in the passion, skills, and engagement of our people.

We Believe…

**The Math Must Work.** Delivering sustainable, profitable growth.

We Demand…

**Speed.** Energetically showing individual and organizational responsiveness.

We Provide…

**Unparalleled Customer Experience.** We are relentlessly responsive with our customers and partners.

We Exhibit…

**Ethics and Integrity.** Courage to always do the right thing.

We Require…

**No Politics.** Supporting each other without selfish self-interest.

We Stand…

**One KEMET.** One global team valuing diversity and inclusion.

We Lead…

**Material Innovation.** Breakthrough technology leveraging sustainable material science.

We Protect…

**Environmental Sensitivity.** Committed to protecting human health, safety, and natural resources.
MISSION, VISION & VALUES

Our MISSION is
to help make the world a better, safer, more connected place to live.

Our VISION is
to be the world’s most trusted partner for innovative component solutions.

Our VALUES are

Talent Oriented
We believe in the passion, skills and engagement of our people

The Math Must Work
Deliver sustainable, profitable growth

Speed
Energetically showing individual and organizational responsiveness

Unparalleled Customer Experience
Relentlessly responsive with our customers and partners

Ethics & Integrity
Courage to always do the right thing

No Politics
We support each other, without selfish self-interest

One KEMET
One global team valuing diversity and inclusion

Materials Innovation
Breakthrough technology leveraging sustainable material science

Environmental Sensitivity
Committed to protecting human health, safety and natural resources
1. How Our Code and Our Ethics Apply to Our Business

About Our Code

Our Code is a key tool in our mission to make the world a better, safer, more connected place to live. Every day, each one of us makes decisions that can have lasting consequences, good and bad, for ourselves and KEMET. Our Code helps us navigate those decisions and make sure we are always living up to our mission and our values.

Our Code applies to all of us: from the directors on our Board to KEMET’s officers, from each employee to any agent acting on KEMET’s behalf.

While our Code cannot cover every situation we might face, we can use it to find answers to many common questions that arise and to locate resources to report our concerns.

Our Role in Ethics

We all have a responsibility to be familiar with our Code and with any other relevant written policies, rules, regulations, and laws that apply to our roles at KEMET. Any employees who are unsure what policies, rules, regulations, or laws might apply to their work should seek guidance using the resources listed here in our Code. When local law requires higher standards than those in our Code or policies, we follow the higher standards.

KEMET has also adopted the Responsible Business Alliance (RBA) Code of Conduct, which can be reviewed here.

Our Managers’ Role in Ethics

Managers play a special role in nurturing the ethical culture at KEMET. They must be familiar with our Code, our policies, and all applicable law so that they can thoughtfully explain risks and answer questions from employees. In addition to keeping an open door and an open mind, managers must be willing to be a resource as well as a conduit to the other resources listed here in our Code, and they must ensure that employees are treated fairly. Finally, managers must model our values and show by example the type of ethical behavior KEMET expects from everyone.
Asking Questions and Reporting Violations

We are all responsible for speaking up when we notice an issue or have a question. Only then can KEMET address the issue. If you have questions about any situation, or if you have observed misconduct or a possible violation of our Code, our policies, or the law, then report it. You can seek assistance from:

- **Your Manager**
  - Your local Compliance Resource

- **Your HR Manager**
  - Can help when you have questions

- **The Chief Compliance Officer**
  - Available to help with your questions and concerns
  - SusanBarkal@kemet.com (864) 228 4140

- **KEMET’s General Counsel**
  - Available to help with specific questions relating to possible violations of law
  - JamieAssaf@kemet.com (954) 766-2817.

If you are not comfortable reporting a violation to one of these four resources, you may also use KEMET’s Whistleblower program, which allows anyone to make a report confidentially and anonymously via email or telephone (where local law allows anonymous reporting). When you make a report on the Whistleblower line, no identifying information will be provided to KEMET (unless you should choose to identify yourself). Our Whistleblower Hotline information may be located on KEMET’s intranet and Human Resources portal.
We report issues in good faith

**Good Faith** means we are providing all the information that we have regarding the issue, and that we believe all the information is true. If it turns out that our belief was wrong, the report we provided was still made in good faith. We are not required to investigate issues or provide certainty or proof; we are only expected to speak up with our good faith concerns.

Further, while KEMET has policies and procedures (and in some cases individual contracts) that require employees to keep certain information confidential, those policies, procedures, and contracts shall not be construed to prohibit you from communicating with a government official for the purpose of reporting or investigating a suspected violation of law.

No-Retaliation Guarantee

KEMET does not tolerate retaliation. Every employee should feel free to ask questions, report concerns, or participate in investigations with no fear of reprisals. If you feel that you or someone else is the subject of retaliation, you should immediately contact one of the resources listed in our Code.

When KEMET is aware of anyone who retaliates in any way against those who speak up in good faith, those engaged in retaliatory conduct will be disciplined and may be terminated.

Investigation and Discipline Process

We take violations of our Code, our policies, or the law very seriously. KEMET will thoroughly investigate any potential misconduct or violations; discipline for violations will be consistent and can include termination of employment.

Results of the investigation and discipline process may be provided to those making the report, if providing those details does not violate privacy considerations and will not hinder further investigation or remediation.
2. Ethics in Our Workplace

Treating Each Other with Respect

Always keep in mind that we are One KEMET, one global team whose strengths lie in our diversity and our mutual respect for one another. Respect means we treat each other fairly and with dignity, and we foster an atmosphere of openness.

Respect also means providing equal opportunities for all employees at KEMET. We thrive on our differing experiences, and as a talent-oriented business, we focus on the skills and knowledge of employees, as well as the requirements of any role.

We never discriminate on the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status in making hiring and employment decisions regarding wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices.
A respectful work environment is one that is free of any harassing behavior. KEMET does not tolerate unwelcome conduct. We do not tolerate sexual harassment, including unwanted touching or other physical conduct that is hostile or offensive, and those that engage in such behavior will face discipline including potential termination. If you are aware of any harassing behavior, whether directed at you or at another, you should immediately alert one of our reporting resources.

FOR MORE INFORMATION: Human Rights Policy, Equal Employment Policy, Corporate Harassment Policy

**Ethics in Action Q & A**

**Q:** Jake works with a team that includes several women. His manager, Thomas, often makes jokes about women. Jake thinks the jokes are not appropriate, but since they are not directed at him, and he has never heard any of his teammates complain, he's not sure it's his place to report anything. Is Jake correct?

**A:** No. Keeping a respectful workplace and looking out for our fellow employees is always part of our shared responsibility. Jake should report any harassing behavior, or behavior he thinks might be offensive, even if it is not directed at him and even if no one else is complaining. We all have a duty to speak up.

**Working Safely**

While we work towards innovation and achieving our mission with speed, we never do so in a way that could compromise safety or harm our environment. We keep our safety and the safety of fellow employees and others in mind, and we follow all safety policies and procedures to the letter.
Part of having a safe working environment is having a drug-free workplace. We do not conduct our work, including operating any company equipment, under the influence of alcohol or drugs. Selling or distributing alcohol or drugs while on KEMET property or while conducting your duties for KEMET is absolutely prohibited. Employees with a valid prescription may take that medication as long as it does not interfere with essential work responsibilities or constitute a safety threat.

Reasonable consumption of alcohol during meals or entertainment of clients is allowable but serving alcohol on KEMET property requires written approval from a corporate officer.

We do not tolerate the threat of violence or physical harm in our workplace. If you are aware of any such threat or conduct, report it immediately to the resources in our Code.

**Ethics in Action Q & A**

**Q:** Francine notices that some of her fellow employees have not been wearing the required eye safety equipment in the manufacturing facility. She knows it is because the equipment is bulky and uncomfortable to wear. No one has been injured, and she uses her safety gear. Should she do anything?

**A:** Yes. Any action or inaction that contributes to an unsafe workplace not only increases possibilities for injuries but can also impact our goals and mission. Francine should immediately report any safety issue to the resources listed in our Code.


**Protecting Natural Resources**

Our commitment to safely using and preserving the environment and our natural resources also means that we:

- Conserve and manage energy, water, raw materials, and other natural resources
- Reduce the use of hazardous materials in our products
- Minimize the environmental impact of our manufacturing.
FACILITIES, ENVIRONMENTAL, HEALTH & SAFETY POLICY

KEMET conducts its business in a manner designed to protect the health and safety of our employees, our customers, the public and the environment.

KEMET is committed to the protection of the environment, including prevention of pollution, adverse health effects, occupational hazards and other specific commitment(s) relevant to the context of the organization.

KEMET is committed to the protection of people and the environment in a sustainable manner to prevent climate change and maintain biodiversity and ecosystems.

KEMET will meet or exceed its compliance obligations as well as any other requirement that may be deemed necessary for the protection of humans and the environment.

KEMET is committed to continual improvement of the environmental management system to enhance environmental performance.

KEMET is committed to design and operate its facilities in such a manner as to eliminate recognized risk to human health, safety, and the environment.
Protecting Privacy

Our focus on ethics and integrity means that we diligently care for the privacy of our fellow employees and other third parties. We protect all personal data – information that can be used to identify, contact, or locate an individual – and we make sure we learn and follow all local laws that apply to the use and handling of personal data.

We protect personal data by limiting our use of personal data and taking great care to collect, store, process, transmit, or share it only on a need-to-know basis or when required by law.

FOR MORE INFORMATION: Privacy Policy.

3. Ethics in the Marketplace

Avoiding Fraud and Bribery

In our mandate to provide an unparalleled customer experience, we must never lose sight of our core values or allow our business goals to lead us to consider acting unscrupulously. Rather, we do our part make the world a better place by reducing corruption and increasing transparent business activity.
We do not bribe. We succeed through our teamwork, our speed, and our focus on improving our products and services, not through payoffs or fraud.

We never offer anything of value to a government official or a commercial partner in an attempt to gain business or influence any business decision. We must also make sure that anyone who represents KEMET does not provide anything of value in an attempt to gain a corrupt advantage. There are international laws that provide for serious penalties for both individuals and companies that engage in bribery, so we must be vigilant about our behavior and the behavior of anyone acting on our behalf.

In some situations, government officials may seek so-called facilitating payments, or grease payments, to complete routine or official government actions, such as providing permits. We do not provide such payments, and if you are aware of such a request, you should contact the Chief Compliance Officer.

It is important that we keep accurate records regarding our business expenses and never record payments inaccurately in our records.

Issues and laws related to corruption, bribery, and fraud can be complicated. If you have any questions or concerns about a particular transaction or payment, you should contact the Chief Compliance Officer.

A government official is someone employed by a government or an organization owned or controlled by a government, such as an engineer working for a government-owned manufacturer.

**Fraud** is an intentional deception made for an attempted gain and can include, but is not limited to, making false reports or entries, forgery, embezzlement, kickbacks, making unauthorized transactions, and misusing KEMET’s or another’s assets.

**Anything of value** means just that – any item or service that has value: cash, gifts, entertainment, favors, even job opportunities.
Responsible Gifts and Entertainment

We succeed in our mission by using our focus and our product and material innovation to provide our customers with a clear, quality alternative. While there are times when reasonable gifts and entertainment can be provided to, received from, or exchanged with customers or business partners, we do not rely on such activities to secure business, nor do we want to create the impression that such activities can affect our business judgment.

Gifts and entertainment should be used to foster understanding with our customers and partners, should be modest, and should follow our policy, including our dollar limits for such expenses. If you receive a gift or entertainment valued above our limits and are unable to refuse or return it, you should contact your manager or your HR manager and provide the details.

Local rules and policy regarding gifts and entertainment may vary; please contact your local HR manager for further guidance.

If you have any questions about our gifts and entertainment policies, please contact one of the resources in our Code.

Ethics in Action Q & A

Q: Denise is working with a local agent on a project overseas where KEMET is opening a new facility. The construction team is waiting to get a final electrical permit to allow the facility to open for business. The agent tells Denise that he can pay the local inspector a small fee of $50US to get the proper permit in a day, otherwise it might take two weeks. Denise knows that getting the permit sooner will save KEMET money. What should she do?

A: Denise should not provide the payment and should tell the agent that no payments of such kind will be approved. She should also inform the Chief Compliance Officer about the requested payment from our agent.
Competing Fairly

Just as we do not engage in fraud or bribery to secure business, we do not enter into any agreements with competitors or otherwise seek to hinder honest competition. We comply with all applicable competition laws, and we never make any agreements, whether informal or formal, written, or verbal, to:

<table>
<thead>
<tr>
<th>Type of Expense</th>
<th>Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Entertainment</td>
<td>$250 US</td>
</tr>
<tr>
<td>Gifts or favors</td>
<td>$100 US</td>
</tr>
</tbody>
</table>

Gifts or entertainment should never be:

- Frequent, lavish, or higher than our monetary limits
- An attempt to influence a business decision
- Solicited or requested
- Comprised of cash or cash equivalents (such as gift cards).

Ethics in Action Q & A

Q: A supplier offers Frankie, a purchasing department employee, an opportunity to play at an exclusive golf resort. Is this an acceptable gift under our policy?

A: It may not be. There are some questions that need to be considered. First, what is the value of such a gift? It is likely to be more than our acceptable limits. Second, does the supplier expect anything in return, such as future business, that could call into question Frankie’s unbiased decision-making? Could the supplier be seeking some improper influence? To be safe, Frankie should discuss the situation with his manager or his HR manager before accepting such a gift.

Expense Limits by Type

<table>
<thead>
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</tbody>
</table>

Q: A supplier offers Frankie, a purchasing department employee, an opportunity to play at an exclusive golf resort. Is this an acceptable gift under our policy?
• Fix or set prices or agree on bid terms
• Allocate customers, markets, or contractors
• Limit production or sales, or condition sales on other purchases
• Unduly limit a customer’s ability to sell a product
• Attempt to monopolize a market, including by pricing below costs

If you are aware of such agreements or discussions regarding any of these topics, you should immediately contact the Chief Compliance Officer. We must always be careful when we interact with our competitors so that there can be no perception that we are engaged in any improper agreements.

We do not make false or misleading claims about our competitors’ products and services, and we do not attempt to gain confidential, proprietary information about our competitors, such as customer lists or other confidential information, by encouraging customers or others to violate their confidentiality obligations to such competitors.

FOR MORE INFORMATION: Antitrust Policy.

Ethics in Action Q & A

Q: Sabine is at her first trade show. At the event’s dinner, she sits next to a representative from one of KEMET’s competitors. The competitor is talking with a colleague about some sales opportunities the competitor is working on. What should Sabine do?

A: Sabine should excuse herself and leave. She should then contact the Chief Compliance Officer and report the incident. She should neither tell anyone else the information she heard nor act on it.

Following Trade Laws

While we seek to be energetic with our response and provide our customers the best possible service on their requests, we always follow applicable laws regarding exports and sanctions. When we are seeking to transfer products, technology, or information out of the country, we must follow all regulations that apply and make sure we have acquired any necessary export licenses and reviewed any applicable sanction databases to confirm the appropriateness of any transfer. Even when we do not
physically export technology or information out of the country, any transfer to a foreign person can still be considered an export.

Violations of export or sanction laws can be costly, so contact one of the resources listed in our Code if you have any questions.

Ethics in Action Q & A

Q: Steve is processing an order for some products to be sent overseas. He notices that the location for the shipment is in a different country than the country where the order originated. The destination country is not listed in any of the other documents relating to this order. What should Steve do?

A: Steve should contact his manager or one of the other reporting resources about the different shipping location. While it may mean nothing, it could also be an attempt to mask the real destination of the products, and it might be an attempt to avoid sanctions. It is worth investigating further before proceeding.

Reasonable Political Contributions

We encourage employees to be connected to their communities and to engage in political activities in their individual capacity. However, at no time should employees suggest that they speak for KEMET, nor should employees contribute to any candidate or cause on behalf of the company.

Employees may not use KEMET resources, including company time, property, or personnel, for political activities. Additionally, employees should never feel forced to support any candidate or cause nor feel forced to make any political contribution.

Ethics in Action Q & A

Q: Sharla’s manager, Dolly, asks her to purchase a ticket to a fundraiser for a candidate Dolly supports. Sharla does not want to upset Dolly and is not sure what to do.

A: Sharla should report this request to one of the resources listed in our Code. It is not appropriate and is a violation of our Code for Dolly to make the request.
4. Our Commitment to KEMET

Avoiding Conflicts of Interest

We are one team with a goal to make the world better, safer, and more connected. To accomplish those goals as One KEMET, we have to work together, not only for our own benefit, but for the best interests of KEMET.

We should watch out for situations that can lead to conflicts of interest, such as:

- Using KEMET assets for personal gain
- Taking opportunities for ourselves, including investment opportunities, that we learn about through our role at KEMET
- Developing products or services that compete with KEMET
- Failing to disclose to our manager or another reporting resource any familial or other relationships we have with KEMET employees that we supervise directly or indirectly, or with customers, competitors, or other partners.

We cannot directly or indirectly supervise or be supervised by any member of our immediate family, including a spouse, parent, child, or sibling. Additionally, when a personal or family relationship may impact our decision-making or hiring, or might lead to the appearance of a conflict of interest, we must come forward promptly to disclose the potential issue to our manager, local HR manager, or the Chief Compliance Officer.
Working together can sometimes lead to friendships, romantic relationships, and other close relationships with other employees. These relationships cannot negatively impact our respectful work environment. KEMET does not tolerate any behavior that violates our Code or our policies that arises from any such relationship. Anyone in a managerial role cannot directly or indirectly supervise someone with whom they are in a romantic or close relationship. Such relationships must be disclosed immediately.

Even the potential for a conflict of interest can create the impression that our decision-making or loyalty to KEMET has been compromised. Therefore, it is best that we err on the side of disclosure and report all potential conflict of interest situations immediately to our manager, our local HR manager, or the Chief Compliance Officer.

When in doubt, disclose potential conflicts.

FOR MORE INFORMATION: Employment of Relatives Policy.

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**Ethics in Action Q & A**

**Q:** Rather than engage KEMET on a new project, a KEMET customer suggests that Herbert personally take it on. The project is small, and it isn’t clear that KEMET would even be interested. Herbert knows he can complete the project on his own time and without KEMET resources. Is this okay?

**A:** No. Even if the second job would not interfere with Herbert’s job at KEMET, he is potentially taking for himself an opportunity that belongs to KEMET. There is also likely to be confusion about who is responsible for the work. Herbert should not take on the project or, at a minimum, should contact his manager or one of the resources in our Code before agreeing to such an arrangement.
Protecting Our Assets

To complete our mission, we need to use KEMET’s assets effectively and protect them from abuse and misuse. We do not use KEMET assets for our own benefit with one exception: we may use resources such as internet access in a limited personal manner consistent with other company policies and with the understanding that KEMET has access to any information stored on its electronic assets.

Company assets include funds, products, facilities, equipment, and the electronic information systems. Any asset theft, loss, damage, or misuse should be reported to your local Security Office. If there is no local Security Office, contact the reporting resources listed in our Code.

KEMET’s valuable assets also include our intellectual property, including KEMET’s trademarks and brands. Use of our trademarks or brand names must follow our guidelines. If you have any questions about this use, contact one of the reporting resources in our Code.

Q: Beth works for a non-profit in her community. She is planning to use her work laptop and printer to put together a flyer for the organization’s upcoming fundraiser. She’s also going to use the KEMET logo on the flyer to get more attention for the event. Is this okay?

A: No. Beth cannot use KEMET’s assets (computer, printer, and logo) without proper authorization, no matter what the purpose is.
Protecting Confidential Information

To continue to be innovative and serve our customers with excellence, we must leverage our specialized knowledge and safeguard our confidential and proprietary information. This information includes, but is not limited to, both non-public information that could be helpful to our competitors and information that our partners have entrusted to us.

Confidential and proprietary information includes, but is not limited to, trade secrets, patents and trademarks, customer listings, marketing and sales data, strategic plans, information on acquisitions and investments, and other research or data.

We maintain confidentiality by properly marking confidential information, keeping and handling it securely, and never providing access except to those who have a business need to know.

Our obligation to protect the company’s confidential and proprietary information continues throughout and after our employment at KEMET. Upon leaving KEMET, salaried employees are required to sign a form acknowledging their continuing commitment to protect our confidential information.

FOR MORE INFORMATION: Corporate HR Policies and Procedures Document, Compliance with Regulation FD.

Ethics in Action Q & A

Q: Sandy’s job includes compiling confidential customer listings. In moving his office from one building to another, Sandy placed some of his work in a box on the back of his pickup truck. During the trip, the top of the box flew off, but Sandy is fairly certain that none of the confidential information was lost. Should Sandy do anything?

A: Yes. Improperly handling confidential information as Sandy has done, even if no sensitive data was lost, is a violation of our Code and our policies. Sandy should inform his manager about the incident.
Keeping Accurate Records

We all have a duty to make sure KEMET’s business and financial records are complete and accurate. False or untruthful statements in our records can cause KEMET serious consequences. If you are aware of any inaccuracies in our records, contact one of the reporting resources in our Code immediately.

Each of us must be familiar with our department’s records management policy as outlined in the KEMET Quality Manual. We never alter, conceal, or destroy any records that are subject to any investigation or any legal hold to which we have been alerted.

If you are aware of any inaccurate or incomplete records or have questions about any record or our record-keeping procedures, you should contact one of the reporting resources listed in our Code.

We also have to be familiar with our duties to protect electronic information as outlined in our Computer Policies and Standards. Remember that our Code and our policies, including our focus on maintaining respect, apply when we are using KEMET email or computer networks, just as they would apply in our offices.

When using KEMET’s electronic assets:

- Do not open attachments from unknown parties
- Take care when visiting unknown websites
- Use only approved software
- Maintain security, including for passwords and usernames
- Promptly report any security breach or issue.


Ethics in Action Q & A

Q: Malory just can’t remember her password, so she writes it on a Post-it Note and puts it under her keyboard at her desk. Is this okay?

A: No. Our policy requires that all employees reasonably protect their passwords. Malory’s careless handling of her password doesn’t follow our policy and is a security risk.
Responsible Communication

To remain a trusted partner, we must provide accurate and consistent public statements. To maintain such consistency, only those employees that have been specifically authorized to speak on behalf of KEMET should do so. When we are expressing our opinion, including on social media platforms, we must make it clear that we are speaking for ourselves and not speaking for KEMET.

When we do communicate, online or off, there are some guidelines we should consider:

- If it is not OK offline, it’s not OK online (e.g. harassing behavior),
- Our Code, our policies, and the law apply online,
- When you post online, it is forever.

If you receive a request for information from the media, an investor, a government official, or some other outside source, be polite but contact your manager or the Chief Compliance Officer with the request immediately.

FOR MORE INFORMATION: Compliance with Regulation FD.

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Ethics in Action Q & A

Q: There is a posting on social media about a KEMET product that Hamish knows. He believes the post includes incorrect information about the product that he’s certain he can correct. Should he post a response?

A: No. Hamish needs to be wary about making such statements when he is not specifically authorized to speak on KEMET's behalf, otherwise, it might appear that he is speaking for the company. Instead he should notify his manager or one of the other reporting resources in our Code.
No Trading on Inside Information

We do not trade in securities based on knowledge that comes from our role at KEMET. It is against our Code and policies, as well as the law, to trade in securities using inside information or to tip others by providing inside information that they can use to conduct securities trading.

FOR MORE INFORMATION: Corporate HR Policies and Procedures Document, Statement of Policy to Directors, Officers and Key Employees concerning Securities Trading and Disclosure of Confidential Information.

Ethics in Action Q & A

Q: Kate is on a team providing components for a new product our customer is preparing to launch. Kate knows from her work with this customer that the new product has the potential to be very popular. She plans to buy stock in our customer because she believes in their new product. Since she’s buying stock in another company, not KEMET, is this okay?

A: No. It is a violation of our policy and the law to trade on any insider information, whether the securities are shares of KEMET stock or not. If you have questions about our Insider Trading policy, you should contact one of the reporting resources in our Code.

Waiver

Our Code cannot be waived without expressed approval of the Audit Committee of the Board of Directors after a review directed by the Chief Compliance Officer.