

**TENNECO**

# CODE OF CONDUCT

## TENNECO'S ROADMAP

OUR CORE  
VALUES  
GUIDE  
THE WAY.



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## LET'S GET STARTED



### Tenneco Team:

There is no doubt this is an exciting time for the automotive industry. Not only is change happening at a breathless pace, but the competitive landscape has also dramatically altered the way we do business.

At Tenneco, we are breaking away from traditional and predictable ways of thinking in exchange for an unconventional change mindset built on a set of core values as our guide – Radical Candor, Simplify, Organizational Velocity, Tenacious Execution and Win. If we continue to adopt a change mindset and lean into our core values, the path to becoming the world's most trusted

partner and the best manufacturer in the automotive industry will become a reality.

We have set a high bar, but I am confident in our collective abilities to accomplish what we set out to do. It's important for us to remember, however, that how we achieve success matters and it all starts and ends with Integrity – it is the foundation of everything we do. We must always remain committed to doing the right thing the right way and follow all laws, regulations, and policies applicable to our business.

You may face a situation where doing the right thing is not obvious, which is why we have a Code of Conduct in place. It guides us with a set of important principles intended to ensure that we operate and behave in a way that will help us earn the trust and confidence of our customers, partners, and each other. It is a tool that empowers you to make sound decisions, even in tough situations, with guidelines and examples on how to speak up with questions or concerns.

Success requires a personal commitment from everyone. Please do your part by familiarizing yourself with our Code of Conduct and refer to it often.

Thank you,

Jim Voss  
Chief Executive Officer



## WHAT DRIVES US

Our driving force is our people. We bring to work every day:



**A passion to be the best**



**A disciplined attention to detail**



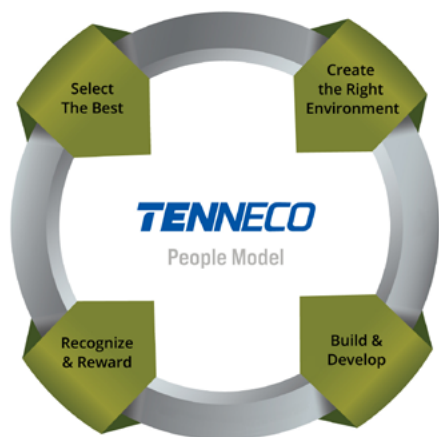
**A competitive tenacity**



**A fierce determination to deliver on commitments**

## OUR PEOPLE MODEL

The Tenneco People Model is built upon our Core Values. How we perform as individuals connects with how we perform as a company. Our Code is here to help you prepare for how to achieve our business objectives with integrity.



### UNLOCKING THE POTENTIAL OF OUR PEOPLE TO UNLEASH THE POWER OF TENNECO



#### Select The Best

Top talent to deliver superior results



#### Create the Right Environment

Inclusive, Open, Collaborative



#### Build & Develop

Future focused capabilities & leadership



#### Recognize & Reward

Performance, Core Values, Teamwork

## OUR PURPOSE

To be the world's most trusted partner and best manufacturer in the automotive industry.

## OUR CORE VALUES



### RADICAL CANDOR

We must engage in productive debate and create constructive tension. Be open and brutally honest, with positive intent. Truth is harmony.



### SIMPLIFY

We must reject bureaucracy, minimize layers, and eliminate silos. Be clear, break down barriers, put together a plan, and focus on execution.



### ORGANIZATIONAL VELOCITY

We must build a global team and an organizational structure that facilitates fast decision making, speed of execution matters.



### TENACIOUS EXECUTION

We must drive an accountability and ownership mindset that is the bedrock of our culture, and the foundation for all we do.



### WIN

We must win the trust and confidence of our employees and customers.

## OUR CODE

### Our Code shows how we put our Core Values into practice.

Each team member at Tenneco has something special to offer. It may be a unique skill, a well-developed talent, or an unparalleled knack to simply get the job done. Although our abilities may vary greatly, we share a commitment to our Core Values.

Our Code shows how each of us can put these Core Values into practice. You can use it to learn the rules of the road, to navigate blind spots, and to gain clarity on how to watch out for others. We protect each other and the company this way.

Keep in mind that although the Code is here as your guide, it will not answer every question you may have while working at Tenneco. No document can do that. But it will steer you toward the principles and resources you need to do what's right. So, use good judgment and reach out when you need help.

Understanding the Code will prepare you for our journey together. It will help you learn what matters most and ensure you always stand firm in doing what's right.

### Who has to comply with our Code?

You do. The Code applies to everyone, at every level of our company, including our officers and Board of Directors, and to every person and organization working on our behalf or doing business with us.



In addition to this Code, our CEO, CFO, and certain other individuals responsible for accounting and financial reporting must comply with our Code of Conduct for Financial Managers. Our publicly traded subsidiaries may also have other local requirements.

### What if we don't follow our Code?

We can lose the trust of each other, our investors, customers, and others when we don't follow our Core Values or our Code. It can also hurt our brands. That's why violations of the Code can lead to serious consequences, like losing your license or your job, affecting your performance review, or even fines and jail time. Let's work together to avoid this. Only our Board of Directors can approve changes to our Code or waive a requirement.

## What is included in our Code?

For team members and other parties – including those who work with us, for us, and on our behalf – you will find out how to:

- Follow our Code, our policies, and the law.
- Use good judgment and common sense.
- Navigate gray areas and blind spots.
- Speak up when you see or suspect misconduct.
- Cooperate with investigations.
- Ask questions if you don't know what to do.

If you're a manager, you also need to set the example by:

- Acting appropriately and in ways that support the Code.
- Being accessible to answer team member questions.
- Encouraging your team to share new and innovative ideas.
- Discussing the Core Values with your team.
- Confirming your team understands the Code.
- Evaluating team member performance in ways that make it clear our Core Values are just as important as our results.
- Reporting potential misconduct and escalating reports of misconduct raised by your team or others.
- Taking action to prevent retaliation against anyone who reports a concern in good faith.
- Considering appropriate courses of action when someone has violated our Code, including performance objectives to mitigate risk and to develop controls.
- Coordinating with HR, the Law Department or Internal Audit as appropriate.



## TENNECO GPS

It directs our choices  
to ensure we find the right road.



If you are ever lost and trying to find your way to the best course of action, ask yourself:

**Is it legal?**



**Is it consistent with our Code and our policies?**



**Does it support our Purpose and Core Values?**



**Is it consistent with our promise to our customers, team members, shareholders, communities, and those who work with us, for us, and on our behalf?**



**Would you be comfortable if your actions were reported by the media?**



If you answer “yes” to all these questions, it’s probably OK to proceed. But if you answer “no” or “I’m not sure” at any point, stop, speak up, ask, and reconsider. Remember, we always act with integrity.

Keep in mind, there are many resources available to help you if you're not sure what to do. You do not have to face a difficult situation alone.

# ASKING FOR DIRECTIONS

## Speaking Up

Violations of our Code, our policies, or the law can hurt Tenneco and our team members. If you ever see or suspect something improper, speak up. Even if you're unsure, speaking up is always the right thing to do.



### WHEN TO SPEAK UP

If you see or suspect a violation of:

- Our Core Values or Code
- Our policies and procedures
- Any law or regulation



### HOW TO SPEAK UP

Feel encouraged to contact:

- Your manager
- Another manager you trust
- Human Resources
- [Law Department](#)
- Finance
- [Global Compliance](#)

In addition, the [Tenneco Hotline](#) is available 24 hours a day, seven days a week by phone and online. The toll-free numbers are listed on our [website](#).

Calls and reports to the Tenneco Hotline are handled by an outside company. In most countries, you have the option to remain anonymous. In countries where the law does not allow it, the Hotline representative will let you know. If you use these resources to speak up, you will receive a report number so you can check the status of your report or provide additional information.

Keep in mind that all issues reported through the Hotline will be forwarded to the [Chief Ethics & Compliance Officer](#) and your inquiries will be addressed promptly. At Tenneco, all reports of possible misconduct are taken seriously. Once a report is received, we will investigate the matter confidentially, make a determination whether our Core Values, Code, policies, or applicable laws have been violated, and take appropriate corrective action promptly and thoroughly. Tenneco's team members are expected to cooperate in investigations.

## Non-retaliation

At Tenneco, we don't allow any form of retaliation (such as firing, salary reduction, or any other negative job action) against those who share sincere concerns, cooperate in investigations, or make honest reports.

What is an honest report? It's speaking up about something that you truly believe may be a violation of our Code, our policies, or the law – even if you're mistaken.

Whether or not your suspicions prove to be true, they will be taken seriously, and you will be protected when coming forward. We value your voice and encourage you to speak up with as much detail as possible. The more information you provide, the more likely we can resolve the issue at hand.

So, speak up and take comfort in knowing you're helping maintain the trust and reputation that keeps us in the driver's seat.



## WINNING TOGETHER

At Tenneco, we are a team. With experts on everything from manufacturing to distribution, we rely on each other for information and resources. When we do, we discover just how talented each of us truly is. By taking care of each other and embracing our differences, we will succeed, and we will do it together.

### IN THIS SECTION:

- 🛡️ Respecting Each Other
- 🛡️ Being Inclusive
- 🛡️ Putting Safety First
- 🛡️ Working With Other Parties



# RESPECTING EACH OTHER

## The Destination

Promoting a collaborative and inclusive work environment that's free of harassment, bullying, and abuse.

## How We Get There

We value every member of our team and know that everyone deserves to be treated with dignity and respect. That's why each of us, at every level of our company, and everywhere we operate, has an obligation to put a stop to harassment.

We do so by trusting each other. Everything we do starts and ends with trust. We trust that people are doing the right thing, taking care of each other, and working to create a positive environment where team members can do their jobs without fear of harassment. We also make sure we can recognize harassment so we can report it if we see it.



### ROLE MODEL OF ETHICAL BEHAVIOR.

**Getting involved.** *You overhear a team member insulting someone's religion. You ask them to stop, then report the behavior. Overstep?* No. We respect others' religious beliefs, so you did the right thing by speaking up. Do so whenever you witness something similarly disrespectful and inappropriate, or if you face a situation involving violence, threats, bullying, or harassment.



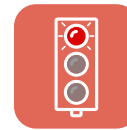
### CAUTION.

#### Keeping it professional.

*You just learned of a team member's promotion. You're happy for them and want to give them a congratulatory pat on the back. Allowed?*

Maybe, but it depends on the customs and culture at your location. If you have any reason to believe such physical contact may be unwelcome, find another way to congratulate your colleague.

We use open and honest two-way communication to ensure the best chance at victory.



### WRONG WAY.

**Using humor as an excuse.** *Tension is high with the team because quarter-end results were disappointing. There's a hilarious meme you want to show everyone to break the tension, but the associated picture is a bit ... suggestive. Hey - we're all adults, right?* Don't use that as an excuse. Sharing inappropriate sexual images is a form of sexual harassment. We don't tolerate **any** actions or words with a sexual connotation that could make someone uncomfortable or interfere with their ability to do their job. Find something more appropriate to share.



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What does “harassment” look like?

Harassment is unwelcome conduct that can make the workplace feel like a hostile or intimidating place to be. We want to instead build a culture of trust, where we care for each other. Do your part by avoiding all forms of harassment, including:

- **Verbal**
  - Demeaning or derogatory jokes
  - Racial slurs
  - Threats
  - Name-calling
  - Crude remarks
- **Visual**
  - Offensive cartoons
  - Offensive emails
  - Graphic drawings or pictures
  - Foul or obscene stares or gestures
- **Physical**
  - Pushing or shoving
  - Brushing against another’s body
  - Sexual advances
- **Discriminatory**
  - Based on a personal characteristic, like, but not limited to, gender or race, etc.

Remember that bad behavior doesn’t have to fall on this list to violate our Code. The most important thing to remember is to respect one another and be considerate of each other’s feelings. After all, it’s the impact of your actions that matters. Saying, “That’s not what I meant” doesn’t make it OK.



**THE GARAGE**

# BEING INCLUSIVE

## The Destination

Promoting an environment where everyone feels included and encouraged to bring their whole self to work.

## How We Get There

At Tenneco, we seek greatness, which comes in all forms. While we're lucky to have a talented team with a diverse background, we don't stop there. We aim for every member of our team to feel valued, included, and respected.

Our people are our greatest asset. We protect them by promoting inclusion and diversity, observing fair employment practices, and never tolerating discrimination. Help us give everyone an equal chance to succeed by celebrating differences and inspiring those around you to be their best selves.

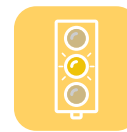
**We value all forms of diversity, including:** age, ancestry, lineage or citizenship, color, race, religion (including religious dress and grooming practices), ethnicity, disability, marital or family status, medical condition, genetic information, military and veteran status, political affiliation, national origin (including language-use restrictions), sex (including pregnancy, childbirth, breastfeeding, and related conditions), gender identity and expression, sexual orientation, and more.

We are committed to ensuring inclusion in everything we do.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Promoting equal opportunity.** *Your team believes someone was turned down for a project because of their decision to transition genders. They turn to you for help. Right choice? Definitely.* Employment decisions should be based on job-related criteria, without regard to gender expression. By speaking up, your team is helping to maintain a fair, diverse, and welcoming workplace. You also bring some ideas to the conversation on how we could let the person know we support their transition. By getting the conversation going, your team can more quickly put ideas into action.



## CAUTION.

**Working consciously.** *Your team is interviewing two candidates who are equally qualified. One of the candidates is diverse. Someone on the team suggests picking the person with the better personality since it will be a better fit. Smart move? Not really.* Implicit bias may steer you in the wrong direction. It would be better to discuss how diversity can strengthen your group.



## WRONG WAY.

**Being disrespectful.** *Your manager makes a joke about someone's nationality. No one says anything at the time, but everyone whispers about how inappropriate it was later. At least you're all on the same page, right? Wrong.* These types of comments have no place at Tenneco. Speak up and know that you will be protected from retaliation if you do.



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Looking for ways to be more inclusive?

- Talk about your unique characteristics – it can encourage others to do the same.
- Don't shy away from difficult conversations, but seek out, listen to, and be respectful of different points of view.
- Never be afraid to admit you have more to learn about another's experience.
- Speak and act in ways that make people feel valued for who they are.
- Always consider the importance of diversity when making employment-related decisions.



## THE GARAGE

# PUTTING SAFETY FIRST

## The Destination

Creating an environment where we feel safe and take care of each other.

## How We Get There

Safety is a huge part of our culture, and each of us plays an important role. Through policies and procedures, inspections and checklists, safety committees and safety training, we work hard to ensure everyone feels safe.

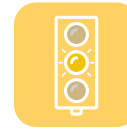
To succeed, we need your help. Stay alert, model safe work practices, and take care of each other.



### ROLE MODEL OF ETHICAL BEHAVIOR.

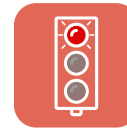
**Staying informed.** *You notice a new hazard sign in your work area, so you take time to familiarize yourself with it. Good idea? Of course! Staying informed is a great way to promote safety. Watch for potential hazards, stay up to date on safety requirements, and report incidents, injuries, near-misses, and unsafe conditions right away.*

**Keeping your distance.** *Your location is under quarantine, and everyone has been asked to work from home. However, you have essential work that you must do onsite, so you get approval from your manager to go in. While there, you keep your distance from others, wash your hands often, and disinfect high-touch surfaces. Smart choices? Yes. There may be times you have to report to work even during a quarantine. In those instances, practice healthy habits to stay safe.*



### CAUTION.

**Getting fit for duty.** *You took a prescription medication for a migraine. OK to work? Maybe. Just be sure you are cleared by your physician to still be able to work safely. Sometimes **prescription** drugs can impair judgment. As for **illegal** drugs, **recreational** drugs and alcohol, using them at work puts everyone's safety at risk. Let's keep these substances out of our workplace.*



### WRONG WAY.

**Ignoring threats.** *A team member talks about wanting to slap your boss. You figure their anger will pass, so you ignore it. No big deal, right? Wrong. Always watch for – and report – any threat of violence. We are a team. Let's take care of each other.*

How we do things is as  
critical to our success as  
what we do.



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### How do I look out for workplace violence?

It can be very difficult to predict if someone will become violent. However, putting things into context can help. If someone shows more than one warning sign or if their behaviors are getting worse, speak to a manager.

Examples of behaviors to look out for include:

- Sudden, persistent complaints about being treated unfairly.
- Poor relationships with coworkers or management.
- Sudden changes in behavior, mood swings, or erratic behavior.
- Paranoid behavior.
- Physical signs of irritation such as pacing, yelling, screaming, making verbally abusive or threatening remarks, or becoming argumentative.



## THE GARAGE



# WORKING WITH OTHER PARTIES

## The Destination

Building mutual trust and respect with other parties that share our Core Values.

## How We Get There

We look forward to continued growth and success at Tenneco. An important component of our success is having mutually beneficial partnerships with our customers, vendors, and other parties.

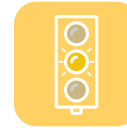
Just as we set high standards for ourselves, we also have certain expectations of those who want to work with us. We do our best to uphold our end of the bargain because healthy business relationships are a win for everyone.



### ROLE MODEL OF ETHICAL BEHAVIOR.

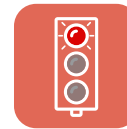
**Choosing wisely.** *You're deciding between two vendors for an upcoming project. Both have been verified and confirmed to have a good reputation, but one is well-known, and one isn't. You're tempted to choose the well-known vendor, but when you evaluate needs, price, quality, availability, and services, the lesser-known vendor has stronger capabilities. So, you choose the lesser-known vendor instead. Right choice? Yes. Besides always checking references and background, we need to practice due diligence, make sure they share our Core Values, and evaluate them based on objective criteria and not on how popular they are.*

**Treating everyone fairly.** *A potential vendor sends you and your partner tickets to a professional football game. It feels excessive, so you return them with a polite note explaining our policies. Smart move? Very. Accepting a **gift** from a potential vendor could give the impression that you are choosing what's best for you, not the company. Gifts should be disclosed as required by our policy.*



### CAUTION.

**Monitoring performance.** *You recently began work with a contractor. You let them know that we expect them to uphold our high standards and follow the law even if it means that the project will take longer. You've done your part, right? It's a great start, but also closely monitor their work. Review invoices for anything suspicious and make sure they deliver on time and as promised while supporting our Core Values.*



### WRONG WAY.

**Protecting their information.** *One of our contractors accidentally emails something confidential. It's too juicy not to share, so you discuss it with a team member over lunch. Not a big deal if you're just telling someone else at Tenneco, right? Wrong. Our contractors trust us with their information. If you receive something by accident, delete it immediately, let the sender know of their mistake, and notify your legal counsel about it. This will send the message that we always maintain confidentiality – showing not only our commitment to win, but doing so the right way. Treat other people's information like you want ours to be treated.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What are “other parties”?

Other parties include any person or company that does, or wants to do, business with Tenneco.

Tips for working with other parties:

- Conduct an appropriate background check before working with a party.
- Do the homework to know the vendor before hiring them (quality, reputation, financial stability, shared values).
- Put in proper controls to manage risk.
- Make sure they understand our Core Values and expectations.
- Make sure the following are included in contractual agreements:
  - The expected deliverables (goods or services)
  - The basis for earning the commission or fee involved, or other monetary payments
  - The applicable rate or fee
  - Compliance with legal obligations
- Request and review documents, such as receipts, to support any reimbursements.
- Follow our vendor screening process.



## THE GARAGE

Supplier Code of Conduct





## PROTECTING OUR INVESTMENT

People value us because of our commitment to win the right way. They know that each day we will come to work striving to be even better than the day before to deliver results. We earn their trust by respecting and protecting each other, our company, our relationships, and taking responsibility for maintaining the integrity of our brand.

### IN THIS SECTION:

- 🛡️ Keeping Accurate Records and Financial Reports
- 🛡️ Managing Records
- 🛡️ Caring for Our Property
- 🛡️ Protecting Confidential Information
- 🛡️ Protecting Privacy
- 🛡️ Interacting With the Government
- 🛡️ Participating in the Political Process

# KEEPING ACCURATE RECORDS AND FINANCIAL REPORTS

## The Destination

Making sure our records and reports accurately reflect our business.

## How We Get There

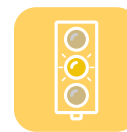
Keeping accurate records and financial reports is at the heart of a healthy business. It helps us make smart decisions, stay on the right side of the law, and keep track of where our money goes.

We all contribute to our company's records, so let's make sure our contributions are positive ones. Whatever you record – whether it's your time, an expense, or a business transaction – do it with integrity. When you do, you're helping us build trust with our investors, our customers, our colleagues, and our communities.



### ROLE MODEL OF ETHICAL BEHAVIOR.

**Being honest.** *Your team member suggests waiting to submit an expense report because your team has reached its budget for the month. You remind her that our numbers need to be accurate and follow up to ensure it was submitted. Was that the right choice? Yes! Having an accurate record is more important than making budget. It's much easier to explain a budget miss than a lie.*



### CAUTION.

**Checking reports.** *It's quarter-end and your boss is happy because your team will hit the target. This morning, however, a large shipment just got delayed until one day after the end of the quarter. It's OK to count it anyway. Right? Not so fast. It's good that you are asking the question. It is important to always work with integrity and confirm that our sales comply with proper accounting rules. Even if the purchase will be confirmed and the goods will be shipped just one day after quarter-end, we can't count it yet. Our investors and auditors require us to be accurate.*



### WRONG WAY.

**Ignoring suspicions.** *You see a team member sign off on an inventory count that they didn't complete. It's not your department, so you look the other way. Is that all right? No. Falsifying records is never OK. Speak up.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Anything else to know?

- Record business records carefully, completely, honestly, and in ways that are easy to understand.
- Keep everything that supports what you record – like the itemized receipt from dinner or the results from yesterday's safety test.
- Only sign and approve documents when authorized to do so.



**THE GARAGE**  
Finance Code



# MANAGING RECORDS

## The Destination

Providing timely access to the information that supports our day-to-day business practices.

## How We Get There

We create a lot of business records, both paper and electronic, and retain the records that meet our tax, legal, compliance, and financial obligations. This protects our company. However, we don't hold on to everything forever. Proper disposal of records that do not need to be kept helps us find what we need in faster, easier, and more cost-effective ways.



## ROLE MODEL OF ETHICAL BEHAVIOR.

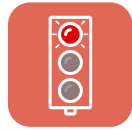
**Protecting personal information.** *You learn that one of our SharePoint sites is housing customer information we don't need anymore. After getting approval from your boss, and the owners of the documents, you dispose of the information in a way that complies with our Document Retention Policy. Role model behavior? Absolutely. Even if the information no longer has value to us, it may still be valuable to a hacker, which could make us susceptible to a breach. By properly disposing of it, you protect Tenneco and those who place their trust in us.*



## CAUTION.

**Getting confirmation.** *You saved several emails because of a legal case that you heard was now settled. OK to delete? Maybe, but check with the Law Department first. Emails are considered business records, and you must keep them if there is a legal hold. A legal hold is the process we follow to preserve documents for a lawsuit, regardless of whether we think they will help us win.*





## WRONG WAY.

**Deleting too soon.** *You find financial records you have downloaded and saved on your hard drive that date back several years, so you delete them. No big deal? Very big deal.* All financial records and official copies of documents and reports should be housed in the company's systems or approved applications and repositories. However, in this case or similar situations, before deleting **anything**, speak to your manager and check our Document Retention Policy. It explains the schedules for the storing, retaining, and disposing of information. Also, remember that regardless of a destruction date, we NEVER get rid of documents that are on legal hold or records that by law cannot be destroyed (like fixed asset documents). By following our policies, you will be showing your commitment to integrity.



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What does managing records look like?

It is about more than just adhering to policies. It's about using common sense. Stay organized and keep what matters. That way if anything becomes subject to an authorized audit or investigation, we can respond appropriately.



## THE GARAGE



# CARING FOR OUR PROPERTY

## The Destination

Taking good care of what's ours.

## How We Get There

Chances are, no matter your role, you're responsible for valuable company property. Do you operate equipment, type on a computer, or access intellectual property? All of these are examples of company property that Tenneco owns or uses to conduct business. We each have a personal responsibility to care for them.

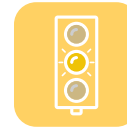


### ROLE MODEL OF ETHICAL BEHAVIOR.

**Taking good care.** *You notice some friction around the moving parts of your forklift due to lack of lubrication. You promptly stop operating the equipment and report it to maintenance or to the appropriate area as per the company's operational standard procedure so they can apply the right kind of oil and grease to each component. Good move? Absolutely! It's all our jobs to make sure our physical assets are cared for properly. By contacting maintenance right away, you're caring for – and extending the life of – your machine.*

**It's not just a name.** *You see a company using a name and logo like ours. A colleague says not to worry since it's not exactly the same. However, you decide to report it to the Communications Team and the*

*Law Department. Good choice? Definitely. Our brands and their associated trademarks and logos are valuable property, and we should always report sightings of confusingly similar names and logos so the company can consider possible legal action. "If you see something, say something" is always the right approach when protecting our brand.*



### CAUTION.

**Keeping it simple ... but long.** *You're having a hard time remembering your password, so you come up with something you know you won't forget. Is that OK? Maybe. Just be sure you don't pick something easy to hack. Try a passphrase. Passphrases are strings of words, as opposed to strings of letters. They tend to be long (which makes them hard to figure out), but simple (which makes them easy to remember).*

**Packing up.** *You're packing for a work trip in the morning and don't want to forget your laptop. You consider leaving it in the car overnight, but instead place it in your backpack by the door – to grab on your way out. Good decision? For the most part. You're smart not to put it in your car. If the wrong person sees you, he or she may steal it. You may have really important information about the company on your laptop, so in addition to putting your laptop in a safe place and protected in your bag, make sure that important data is encrypted.*



## WRONG WAY.

**Clicking away.** *You're on your work computer when you see an unusual email request to send confidential information to an executive. Seems urgent, so you should comply immediately ... right? Wrong. Cyberattacks often come in the form of strange emails. If you do not recognize the sender, or if it seems suspicious in any way, close the email and contact IT.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What is our "property," anyway?

There are a few different types of property we should protect, including:

- Physical property (think equipment and inventory like products, parts, raw materials, tools, computers, and phones).
- Technological infrastructure property (think email, internet access, and software).
- Financial property (think cash and bank accounts).
- Intellectual property (think confidential information, creative content, patents, trademarks, and inventions).



## THE GARAGE

# PROTECTING CONFIDENTIAL INFORMATION

## The Destination

Going to extraordinary lengths to preserve, protect, and properly use confidential information.

## How We Get There

The information we own is valuable, often because it is not known by others. It's no secret that in the digital world, everything runs on data. The information in our care enables us to create personal experiences for our customers, hire reputable and talented team members, and keep our competitive edge in the marketplace. If we don't protect it, things can go wrong quickly.

That's why we store confidential information properly and keep it secure, whether it belongs to us, a customer, or a supplier.

Although we communicate some information publicly through advertising, product documentation, news releases, and public financial reporting, we protect everything else through appropriate and reasonable safeguards, and where applicable, legally enforceable

agreements. We never share confidential information without proper authorization or with anyone who doesn't need it to do their jobs.

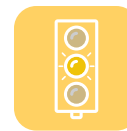
We always ensure reasonable and appropriate controls are in place to protect confidential information.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Speaking privately.** *You're on a crowded elevator when you get a call from your manager. She wants to know about the new marketing strategy you've worked up. You answer the phone but wait until you get to your office and close the door before sharing. Smart move? Very.* Confidential information leaks in many ways, including public places like elevators. It's important to watch what we say and where we say it.

**Securing information.** *You notice confidential information left in a printer in the common area. You secure the information until you can advise the person who left it, and their manager, about the importance of protecting it. Correct approach? Perfect!* Confidential information is not to be shared (inadvertently or otherwise) with anyone who is not authorized to receive it.



## CAUTION.

**Sending confidential emails.** *You have to send something confidential via email to meet a tight deadline, so you attach it as a Word document and send the encrypted file with the password to save time. This should keep things secure, right? Possibly.* Just make sure the password for the encryption is delivered separately.

**Knowing who needs to know.** *You and your team are discussing a manufacturing process improvement when a supplier walks by. Your manager continues the meeting even though the supplier stops to listen. Your manager says it's OK since the supplier signed a confidentiality agreement. Is that OK?* The best way to protect our confidential information is to avoid sharing it with people that don't need to know it. Politely guide the supplier away from your meeting so that your boss can finish the discussion.





## WRONG WAY.

**Sharing confidential information.** *You start a personal blog that touches on stories from work. You think it could help make it easier to hit sales targets, so you mention some unreleased product designs to create interest. Marketing genius? Not at all. A competitor could copy our designs, and you could undermine our efforts to patent the product designs. Do your part by helping protect what we create.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Know how to protect confidential information?

Assume all company information is confidential until you receive confirmation otherwise and be sure to:

- Keep laptops and mobile devices physically and electronically secure.
- Lock your workstation when stepping away.
- Use strong passwords and keep passwords safe.
- Install security software and updates as directed.
- Make sure you are sharing information with authorized people and people with a rightful need to know.



## THE GARAGE

# PROTECTING PRIVACY

## The Destination

Protecting privacy and making sure that we collect, use, share, and retain personal information in a fair and transparent manner.

## How We Get There

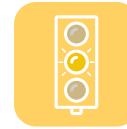
Team members, shareholders, customers, vendors, and others who provide us with their personal information trust that we will handle it with care. We use personal information legally, appropriately, and only for the purposes provided.

Because of the trust placed in us, we take privacy very seriously and make sure everyone who works with us, for us, or on our behalf is aware of our privacy practices and applicable laws. This includes the types of personal information we collect, how we use it, and the rights people have regarding their personal information.



### ROLE MODEL OF ETHICAL BEHAVIOR.

**Respecting privacy rights.** *A team member has gone on maternity leave and a supplier asks for her home address to mail a card. You suggest that they forward the card to her factory location instead. Correct approach? Yes. You shouldn't share a home address or personal data with a supplier – or anyone else – without the consent of your team member or, in the case of accessing our systems and personal information, without the consent of the [Privacy Office](#).*



### CAUTION.

**Practicing cybersecurity.** *You receive an email that you won a contest and need to register your entire team for a free, exclusive workshop. You think this email may have a virus or be an attempt to hack into our system, so you delete the email without opening any attachments or links. Did you miss a step? Possibly. You're smart to know that no matter how strong our system defenses are, clicking on this email could enable a virus that steals passwords, personal data, or company info. Instead of immediately deleting the email, forward it to [Information Security](#) and tell them what you've found so they can make sure someone else doesn't make a mistake.*



### WRONG WAY.

**Ignoring protocol.** *You work in Procurement and receive a request to contact a vendor for a project and provide them with access to our systems. This isn't protocol, but the request is urgent and from a high-level executive. OK to proceed? No. Ensure the vendor is approved by Information Security before providing access to confidential information. Let the executive know that you need to follow protocol and act with integrity. If they insist that you do otherwise, contact a manager for help.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Need some examples?

Personal information includes anything that could identify someone, either directly or indirectly, including:

- Name
- Address
- Email
- IP address
- Phone number
- Bank or credit card information
- Health information
- Team member ID

Not sure if it is “personal information”? Until you know for sure, treat it as though it is.

Have any questions about Data Privacy? Please, contact our [Privacy Office](#).

If you have any questions about cybersecurity, including phishing and spam, please contact Information Security.



## THE GARAGE



# INTERACTING WITH THE GOVERNMENT

## The Destination

Building honest and transparent relationships with the government everywhere we operate.

## How We Get There

We're fortunate to work with various government agencies and representatives around the world. The government looks carefully at these relationships and has strict requirements about them, so trust, accountability, and transparency are essential.

When working with government officials – as with all our business relationships – we follow the rules and never cut ethical corners. If you're ever involved in operations that involve permits, customs, construction, or other types of work with the government, take the steps necessary to protect yourself and the company, and be able to prove that you worked with integrity.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Complying cooperatively.** *A government official arrives at your factory location for a surprise audit. You politely and professionally greet her, and then contact the [Law Department](#) so they can help. Right response? Yes. We always cooperate with government inspections, investigations, and requests for information. The Law Department is well-equipped to respond to the government*

official's needs, so you did the right thing. And if you're ever asked by the Law Department to help respond to a government request directly, tell the truth. Never mislead anyone, impede their work, or conceal, destroy, or alter documents.



## CAUTION.

**Seeking guidance.** *You're hosting an event where government officials will be attending, and you want to hand out some promotional items for Tenneco. No big deal, right? Maybe. The rules that govern gifts to government officials are strict. Before hosting your event, get approval by requesting guidance through our Hotline. You don't want someone to misinterpret your generosity as a bribe.*





## WRONG WAY.

**Contracting unethically.** *A state-owned entity asks you to bid on a project. You coordinate with a competitor to ensure you have the lowest bid. No need to fight over business. Working together like this keeps prices high so both companies can meet targets. Great way to secure business? No. We win the right way – honestly, ethically, and always with integrity. This is bid rigging, a practice that undermines the bidding process and is often illegal. Contact your manager and the Law Department right away.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Who is considered a government official?

The term “government official” is broad and applies to more than just elected officials. It can include:

- Employees of government agencies.
- Employees of government-controlled companies or entities (e.g., public schools, universities, etc.).
- Officials in political parties or even candidates.



## THE GARAGE

# PARTICIPATING IN THE POLITICAL PROCESS

## The Destination

Making our communities better.

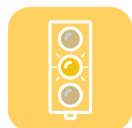
## How We Get There

Participating in the political process is part of being a good citizen and a productive member of society. Although we respect the rights of our team members to engage in the political process and appreciate the various political viewpoints that can be found amongst our team members, political participation must remain separate from our work at Tenneco and consistent with the law and Tenneco policies.



### ROLE MODEL OF ETHICAL BEHAVIOR.

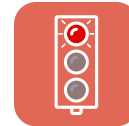
**Keeping politics personal.** *Your friend is running for local office. To show support, you use your home phone to solicit votes when off work. Right call? Well done. Never use company time or resources, like phones, to engage in political activity. Waiting until you get home is a great way to keep politics personal.*



### CAUTION.

**Speaking for yourself.** *You are invited by a local news station to discuss your work on a political campaign. The station wants to introduce you*

*by providing your name, occupation, and place of work. Is that OK? Maybe, but check with the Communications Team first. If approved, ensure that your participation complies with our policies and make it clear that any opinions you express are your own.*



### WRONG WAY.

**Using our name.** *You want to distribute flyers for a political cause you care about and think using the company's logo will help you get more backing. Plus, you know your boss likes this cause and will appreciate your teamwork. All for a good cause, right? Wrong. You may not use the Tenneco name in any political activity without prior approval. We celebrate and protect the diversity of opinions at Tenneco. We expect you to as well.*



### LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

#### Any key takeaways?

Ensure that your participation in political activities is lawful and does not reflect unfavorably on Tenneco.



### THE GARAGE



## NAVIGATING OUR INDUSTRY

No matter where we are, we always operate with integrity. We deal honestly. We compete fairly, and we succeed based on the quality of our products and services. It's not always the easy way, but it's always the right way, and it wins us the trust of our customers, our communities, our colleagues, and our shareholders.

### IN THIS SECTION:

- 🚫 Combating Corruption
- 🚫 Fighting Crime
- 🚫 Competing Fairly
- 🚫 Avoiding Conflicts of Interest
- 🚫 Exchanging Gifts, Entertainment, and Hospitality
- 🚫 Doing Business Internationally

# COMBATING CORRUPTION

## The Destination

Winning the fight against corruption.

## How We Get There

Corruption hurts communities. People who accept bribes put personal benefits (like gifts, travel, meals, and cash) before quality work. If you give money (or anything of value) to improperly influence a business decision, it goes against our commitment to integrity – even if you do it to help the company and not yourself.

A bribe can cause an inspector to overlook a dangerous part or convince a buyer to purchase from an unqualified supplier. That's not how we operate. We always work with integrity. We never bribe – or accept bribes – and we avoid even the appearance of anything improper.



### ROLE MODEL OF ETHICAL BEHAVIOR.

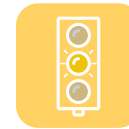
**Knowing other parties.** *You're selecting a supplier and want to choose wisely, so you follow our vendor screening and bidding processes, check business registrations and public documents, verify trade accreditations, speak to previous customers, ask for samples, and search the internet to make an informed decision. Good steps? Absolutely. We want to work with suppliers that value integrity, and we check our supplier's history and reputation. We call that "due diligence." Make sure they understand they may not offer or give bribes for you. Also watch for warning signs after the contract is signed.*

**Keeping accurate records.** *You're reviewing an expense report and notice that each transaction is described in detail ... except for one.*

*That seems suspicious, so you reach out to get more information.*

Great job. It could be an honest mistake, or maybe someone is trying to hide something. The best route is to find out more. You don't want to approve something that might be a bribe.

We fight against corruption by not paying bribes ... it helps to improve our communities.



### CAUTION.

**Accepting invitations.** *A new customer wants to treat you to lunch. Should you accept? Accepting an offer for an inexpensive lunch with a new customer is probably OK if within policy limits. The better choice is to pay for your own lunch and expense it. This way, you avoid the perception that you are open to being influenced.*

**Giving to government employees.** *You recently completed a construction permit application. The associated government agency will evaluate it over the holiday season – during which you plan to give all your contacts fruit baskets. Perfect timing, right? Wrong. The rules for what we can give or offer to government officials, and even their relatives, are very strict. Before you offer anything of any value, check our policy and get approval. Although not intended, your gift could look like a bribe.*





## WRONG WAY.

**Not recognizing bribes.** *Your supplier calls to say that some containers are being held up in Customs. He recommends paying a small cash fee so you can bypass inspection. It's common and everyone does it. You have a team meeting and everyone agrees to proceed. You authorize the payment to ensure the delivery is not late. It's always good to save time, right? Not in this case. The fee might get the containers through Customs faster, but that is not the way we do business. The request for cash was the first clue that this might be a bribe. There needs to be an official fee or approval to expedite the process. Contact the Law Department to discuss next steps.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Can't tell if it's a bribe?

Just remember that a bribe can be almost anything of value, given to sway a business decision. Examples include:



**A special discount**



**Tickets to a sporting event**



**Dinner at an expensive restaurant**



**A job offer or internship**



**Something like cash (such as a gift card or loan)**



**A donation to charity**

Ask yourself: Is someone offering or requesting this in exchange for a favorable business decision? If the answer is "yes," then your response should be "no, thanks."



## THE GARAGE

# FIGHTING CRIME

## The Destination

Keeping our company, economies, and communities safe by fighting crime.

## How We Get There

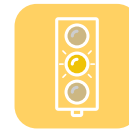
We fight crime by preventing money laundering, which happens when criminals move funds made from illegal activities through a legal business (like ours). Their goal is to hide the origin of their money so they can avoid punishment and continue their bad behavior.

We fight crime by using good judgment, getting to know our customers, and paying close attention when working with suppliers – particularly if a transaction involves cash. By staying alert and speaking up when something seems suspicious, we’re helping to prevent money laundering and keep those around us safe.



### ROLE MODEL OF ETHICAL BEHAVIOR.

**Knowing the signs.** *One of your customers has significantly overpaid. They have done this several times before. When you ask them about it, they tell you to credit the money toward their next order. You feel uncomfortable, so you report it to your manager instead. Right choice? Absolutely. This could be an honest mistake, but it’s best to play it safe. Overpaying could be a sign of money laundering. You did the right thing by seeking guidance.*



### CAUTION.

**Asking questions.** *A customer you know fairly well is interested in buying some defective products. OK to proceed?*

Probably, but it’s important to know your customer and how they use our products. Some companies purchase defective products as scrap and then reintroduce them to the market despite knowing that the defects make the products illegal. To avoid misuse of our products and other forms of criminal activity, ask yourself whether the other party is:

- Attempting to pay in cash
- Paying in a different currency than what’s shown on the invoice
- Requesting to ship to a country other than where the payment originated
- Attempting to avoid recordkeeping requirements
- Having someone who is not a party to the transaction make the payment
- Changing the pattern of their transactions in a drastic way

If you answer “yes” to any of these questions, speak to a manager, or to the [Trade Compliance Department](#). These are all signs of potential money laundering, and we need to know about them.

We do what’s right and we are accountable.



## WRONG WAY.

**Staying quiet.** *A third party makes a payment for a distributor that is struggling. You don't want to take a loss, so you accept payment. Should you be worried? Yes. An unrelated party making a payment seems suspicious. Contact the distributor for details. If you still have concerns, report it. You need to make sure that we can do business with this company and that they are aligned with our commitment to act with integrity.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Anything else to know?

Yes, always select reputable suppliers and other parties, validate bank account ownership, and if you have questions, ask.



## THE GARAGE



# COMPETING FAIRLY

## The Destination

Winning on our own merits and winning fairly.

## How We Get There

We believe that free and fair competition makes for a thriving marketplace. It also leads to advancements within our industry – like innovative products and services and new ways to do business, which makes our customers happy.

So, what do we mean when we say fair competition? For us, it's all about working honestly and ethically. We don't resort to unethical business practices (like lying about our competitors or trying to push new companies out of the market) to get ahead. Instead, we let the quality of our products and services drive our success – nothing more and nothing less. And we avoid even the appearance of unfair competition practices.

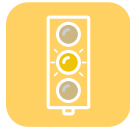
We believe that fair  
competition is fundamental  
to the success of our business.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Avoiding improper agreements.** *A competitor complains to you about a slump in sales and suggests you both raise your prices. You know this is improper, so you shut them down and immediately report the conversation. Smart move? Very. We win the right way – honestly, ethically, and always with integrity. That means we respect the free market by never entering into any improper agreements. Make it clear you don't want to discuss the topic, end the conversation, then contact the Law Department immediately.*

**Respecting the rights of others.** *You know that our Product Development Team is planning to copy new product features recently introduced by a competitor. You know that copying isn't always bad but make sure that the Law Department is aware of our new product plans so we can avoid infringing upon any patents of the competitor, even though it might mean we can't offer the same features. The right thing? Absolutely. We respect the valid and enforceable intellectual property rights of others, including patents, trademarks, copyrights, and trade secrets. Be sure to involve the Law Department when introducing new products, new product features, and new brands.*



## CAUTION.

**Gathering competitive information.** *You need to gather some competitive intelligence information to prepare for a product launch. Is that OK?* Yes, gathering competitive information is encouraged, but it must be done the right way. Be sure to only use honest methods and document that you got them from public sources.

**Hiring from competitors.** *You have a job opening in your group, and you have a candidate from a competitor that has lots of great industry experience. OK to hire?* Probably. While we may hire individuals with knowledge and experience in various business or technical areas, we do not employ people as a means of gaining access to trade secrets and sensitive information of others. Work with Human Resources or the Law Department to understand the risk and put in place safeguards to ensure that team members don't disclose confidential information of their former employers.



## WRONG WAY.

**Protecting competitively sensitive information.** *You're at dinner with a friend who works for a competitor. They suggest sharing strategies so you both can meet your sales targets. Anything for a friend, right?* No. We protect competitively sensitive information and don't share it with anyone without permission and proper safeguards.



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What conversations should I avoid?

Keep conversations with competitors short and general – think weather and sports, not business. If they bring up pricing, production, marketing, inventories, product development, sales territories, goals, or other proprietary or confidential information, then end the conversation and walk away.



## THE GARAGE



# AVOIDING CONFLICTS OF INTEREST

## The Destination

Avoiding influence (or even the perception of it).

## How We Get There

Let's face it, we all have interests and relationships outside of our jobs. But when these personal interests affect our business decisions, it can be damaging. We call this a conflict of interest. A conflict of interest can hurt your reputation and the company.

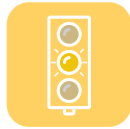
To advance as a team, we need to work as a team. Let's each do our part to steer clear of conflicts and always act in the best interest of Tenneco. We make decisions that are objective and influence-free. Understanding what conflicts of interest are and when they typically arise is the key to avoiding them. It is best to avoid anything that makes it look like your decision is being influenced.



### ROLE MODEL OF ETHICAL BEHAVIOR.

**Recognizing a conflict.** *Your niece wants a job as your assistant. You know she's qualified but tell her that it would make you seem biased – which is bad for the team. You suggest openings in other departments instead. Right response? Yes. It's important to recognize potential conflicts and supervising or doing business with a relative falls within that category.*





## CAUTION.

**Disclosing conflicts.** *A competitor just announced that your wife has accepted a position with them. Time to celebrate, right? Almost. This could be a potential conflict. Make sure you disclose her new position to the company before you grab that celebratory meal.*



## WRONG WAY.

**Not disclosing conflicts.** *You learn that your manager is on the board of directors for one of our suppliers. When you ask your manager about it, he says it's nothing to worry about. Should you say something? Yes. You could remind your manager to fill out the conflict of interest form and give it to Human Resources. Controls may be needed. For example, your manager should not be involved with the bidding, selection, or payment process for the supplier.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What does a “conflict of interest” look like?

There are many scenarios that could happen, but here are some examples:

- Working for a competitor.
- A gift, entertainment, or travel from a supplier.
- A financial investment in one of our vendors.
- A direct or indirect reporting relationship with a friend or loved one.
- Consulting work for a customer “on the side”.
- Your relative works for, or is on the board of directors for, a customer or supplier.



## THE GARAGE

# EXCHANGING GIFTS, ENTERTAINMENT, AND HOSPITALITY

## The Destination

Never giving or receiving anything inappropriate.

## How We Get There

An occasional gift or offer of entertainment or hospitality can be a normal part of doing business. But sometimes gifts or other offers cross the line. Never offer or accept an offer that:

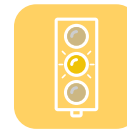
- Creates an obligation in return or is given to win favors
- Comes in the form of cash or a cash equivalent, such as a gift card
- Is excessive under the circumstances or makes others think you are being influenced

It can sometimes be difficult to know when an offer is appropriate, which is why we have guidelines in place. Make sure you follow the rules and are aware of any special restrictions. For example, giving **anything** of value to a government official can be seen as an illegal bribe so it requires the Law Department's approval. Always ask for help if the right thing to do is unclear. If you accept a gift, you must also report it.



## ROLE MODEL OF ETHICAL BEHAVIOR.

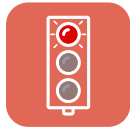
**Saying "no."** *You receive FIFA Soccer World Cup tickets for you and your spouse from a customer. You know you can't accept, so you return them and politely explain our policy. Smart move? Yes. Use good judgement, always act with integrity, and turn down any offer you believe or know is improper.*



## CAUTION.

**Honoring their policies.** *The holidays are coming up, and you would like to send a \$50 gift basket to a customer. This should be fine, right? It depends. Sometimes customers have strict rules and gifts aren't allowed. You wouldn't want your customer to feel uncomfortable and get in trouble because of your gift. Plus our contracts usually require us to respect their rules. In these instances, find another way – like a festive email – to build your relationship during the holiday season.*





## WRONG WAY.

**Giving to government officials.** *You run into a government official after a trade show. Both of you begin talking about a love for Las Vegas and, in your excitement, you suggest that our company might be willing to send her on a weekend trip. This should help us stand out from our competitors, right? Yes, but not in a good way. There are strict rules about gifts for government officials, and this is quite a lavish offer. You need to speak with someone in the Law Department so we can take corrective action right away.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What kinds of gifts are acceptable?

Gifts or entertainment given or received should:

- Be legally acceptable.
- Be accurately recorded.
- Be infrequent and small in value.
- Have a reasonable business purpose.
- Be in line with what's acceptable based on the industry and location.
- Honor the policies of both the giver and receiver.
- Not reflect poorly on – or embarrass – Tenneco.
- Never be cash, a gift card, check, loan, or stock.
- Never put you or Tenneco in a compromising position.



## THE GARAGE

# DOING BUSINESS INTERNATIONALLY

## The Destination

Earning respect as our products and people travel around the world.

## How We Get There

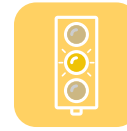
Doing business internationally is a privilege – one that provides many exciting paths for our business and new offerings for our customers. We work hard to maintain these advantages by following import, export, and trade compliance laws.

Let's all do our part to stay on top of what's required and provide the best for our customers. One bad decision or mistake could cause us to lose our opportunity to distribute products around the globe.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Respecting international regulations.** *You want to start selling to a new country, but the country's laws are difficult to understand. You contact the Law Department for help. Right choice? Absolutely. Doing business internationally can get complicated, especially if you have multiple sets of rules to follow. You'll need to research product requirements and understand the laws for that country to make sure that our products, labeling, and operations are in compliance. Fortunately, you have a complete legal and corporate team to help you.*

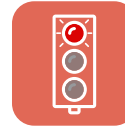


## CAUTION.

**Handling exports properly.** *You're exporting a new product and want to be sure all necessary paperwork is included. You check, and it's all there. Ready to ship? Almost. Check with your Trade Compliance Team to be sure each item has been correctly classified and double check to make sure that the shipment is allowed. This can be tricky and requires attention to detail such as understanding export requirements, checking the destination is not a sanctioned country, and knowing the product, and who will use it.*

**Evaluating business opportunities.** *You're considering doing business with a company in a country we've never worked with before. You do some research to make sure they're reputable. Ready to move forward? Not quite. There are some countries we aren't allowed to do business with, and they change depending on politics. Check our policy for the latest list of prohibited countries. This helps to avoid jail, fines, or losing the ability to export. You also need to follow our vendor screening process to make sure the vendor will follow our Core Values, protect company information, avoid bribes, and work properly with competitors.*

We comply with all  
applicable trade laws  
and regulations.



## WRONG WAY.

**Ignoring boycotts.** You get an email asking you to certify that some products don't come from Israel because they will be incorporated into vehicles going to Iran. You know we can't sell to Iran because it's a sanctioned country, so you draft your message to reject the order and are ready to hit "send." Good to go? No, hold off. You're right, but there is more you need to do. We need to report any request related to a boycott to the U.S. government, even if we don't follow the request. The request regarding Israel qualifies as a boycott request. Contact the Law Department for assistance immediately.



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

When doing business internationally, work with the International Trade Team to:

- Document international transactions completely and accurately.
- Obtain required licenses before exporting or re-exporting our products.
- Properly vet and screen all third parties.



## THE GARAGE



# CARING ABOUT OUR CUSTOMERS AND COMMUNITIES

As proud as we are of all that we've accomplished, we always aim to make tomorrow better for our customers, our company, and our community. By giving back and focusing on creating what's next – we continue to solve tomorrow's problems ... today.

## IN THIS SECTION:

- 🚫 Making Safe, Quality Products
- 🚫 Marketing Honestly
- 🚫 Communicating Responsibly
- 🚫 Protecting Human Rights
- 🚫 Protecting the Environment
- 🚫 Giving Back to the Community

# MAKING SAFE, QUALITY PRODUCTS

## The Destination

Providing customers safe, high-quality products whenever they choose Tenneco.

## How We Get There

We care deeply about product quality and safety, so we make sure our products meet (or exceed) our own internal standards as well as the standards set by laws and regulations at the time they are introduced.

By focusing on quality and safety, we provide products that customers can rely on and a name they can trust.



### ROLE MODEL OF ETHICAL BEHAVIOR.

**Insisting on quality and safety.** *Someone suggests that you skip the pre-production approval process in order to get some products shipped on time. If you don't, your team will fall behind schedule. You speak up anyway. Right choice? It was. We never sacrifice quality to meet a deadline or target. By speaking up, the issue can be corrected, which protects our customers and our company and upholds our commitment to always act with integrity.*



### CAUTION.

**Reporting what you find.** *You learn that no check was performed on a machine following the previous shift. You re-check the machine to be sure it is operating properly. Right move? Yes, but also be sure to report this to your manager. It is everyone's job in the company to be sure that products manufactured are in compliance with required specifications, and it is important to make sure our products are safe for consumers.*



### WRONG WAY.

**Cutting corners.** *You realize that one of the tests that we perform on a product is repeated further down the production line, so you skip the first test to speed up delivery. Smart thinking? Not at all. Skipping a required test is never OK. If you have ideas for speeding things up, share them. But until your ideas are approved, stick to the plan. Otherwise, you risk the safety of our customers.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Additional tips regarding quality and safety:

- Stay alert for new regulations and get certified when needed.
- Ensure that all vendors meet or exceed our requirements.
- Report any violations or any threats you perceive to the safety and security of our products.

Product tampering is potentially dangerous and illegal, and is a violation of our Code. It's important we get to the bottom of it.



## THE GARAGE



# MARKETING HONESTLY

## The Destination

Building our reputation and our brand.

## How We Get There

We do everything with integrity – and that includes marketing and advertising our products. Integrity in advertising means we provide accurate, fair, balanced information regarding our products. By making sure all claims about our products are true and supported by facts, we boost customer confidence and strengthen our brand.



### ROLE MODEL OF ETHICAL BEHAVIOR.

**Making product claims.** *You want to advertise that our new product is better than competing products and that it performs 20% better than the competition. Although you need to get the advertisement out quickly in advance of a big trade show, you take time to work with our engineers to conduct comparison testing before you launch the advertisement. Good decision? Absolutely. We don't make false or unsubstantiated claims about the performance of our products. Substantiating claims often requires conducting fair tests, so work with the Law Department to understand the type of testing needed to substantiate a claim you want to make.*



### CAUTION.

**Clearing our name.** *A competitor has made claims about our products that aren't true. You ask your team to come up with an advertisement with more accurate, fair, and balanced information. Right move? Yes, this is an important moment to get it right. But be sure to speak with the Law Department. Making false claims about our products is unethical and there is more we can do to fight against it.*





## WRONG WAY.

**Providing unverified information.** *You are putting together promotional materials and want to highlight a potential benefit of one of our products. It's not yet backed by significant research, but there is a study going on and the results, so far, have been good, so you include it anyway. Genius, right? No. We protect our customers (and our brand) by always providing complete information. Wait until the study is finished and claims can be verified before using it in advertisements.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Anything else to keep in mind?

When it comes to verifying claims, reviewing marketing materials, or confirming the accuracy of sources we cite – check then check again.



## THE GARAGE





# COMMUNICATING RESPONSIBLY

## The Destination

Sending clear and consistent messages about our company.

## How We Get There

We have so many great stories to share. Stories of giving back, helping customers, and creating innovative solutions. They make us proud, and we want the world to know.

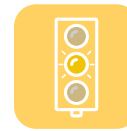
That's why we have team members who make it their job to communicate on behalf of Tenneco. They do so in ways that are consistent, accurate, and complete.

To do your part, you have to help them do theirs. Forward all media inquiries to the [Communications Team](#). Take personal responsibility for what you post online, and speak up if you believe someone is misrepresenting our brand.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Knowing where to turn.** You spot a social media post complaining about one of our products. You know you could resolve it quickly by responding. However, you want to make sure our messaging is consistent, so you refer the complaint to our Communications and Marketing Teams instead. Good thinking? Yes, referring the complaint is the way to go.



## CAUTION.

**Posting responsibly.** You're excited about a new product we've just released and want to post about it on social media. No problem here, right? Probably not. Just be sure to use company-approved materials since the Communications Team works hard to make sure what we say about our products is true. You should also "disclose your connection to the company," which is a fancy way of saying, tell them that you work here. When in doubt if you should be speaking on behalf of the company, reach out to the Communications Team for help.





## WRONG WAY.

**Sharing inappropriate information.** *You're contacted by the media about a rumored new product launch. You've heard about it and believe that sharing what you know would make us look good. Right? Wrong. Talking to the media is best left to the professionals. Our Communications Team knows when it's appropriate – and when it's not – to share information. The rumors may be wrong, or they may even be considered inside information.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Any more social media tips?

- Remember that harassing or discriminatory posts are always wrong.
- Take responsibility for what you post – let people know that your words are your own.
- Do not alter Tenneco's logos and images without prior approval from the Communications Team.
- Never use social media or apps for official company business like contracts or agreements.



## THE GARAGE

# PROTECTING HUMAN RIGHTS

## The Destination

Operating with fair employment practices everywhere we do business and caring for each other as a team.

## How We Get There

From the front office to our manufacturing lines, we make it a priority to advance the human rights of everyone, everywhere.

In protecting human rights, our commitment goes beyond just doing business ethically – it's a commitment to treat people with decency, equity, dignity, and respect. We expect companies that we work with to do the same.

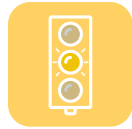
What's your role in all of this? It's simple – follow the law, stay alert, and speak up if you see anything that violates our commitment to human rights. You're on the front lines of witnessing how others are treated in our workplace. And we need you – your time, talents, and energy – to fulfill our mission of putting people first and ensuring everyone has the resources they need to succeed.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Practicing safety.** *You notice an improperly installed machine guard at one of our vendor's facilities as well as chains on the emergency exit doors. You don't want anyone to get hurt, so you report it to the onsite manager right away. Smart thinking? Absolutely. We all have a right to safe working conditions. By speaking up, you're doing your part to advance human rights and serve as a model of best practices to those we work with.*

**Doing your due diligence.** *You're considering the purchase of several windshields from an unfamiliar supplier. They've let you know that the product is made entirely of glass, however, you notice a reflective coating made of a different material. After some digging, you realize the coating is tin, a conflict mineral. You contact the supplier and ask them to provide more information about the origins of the tin. Right choice? It was. We have to be diligent about any blind spots in our supply chain when it comes to tin, tantalum, tungsten, and gold. These are called conflict minerals because human rights are often compromised in the mining and production of these minerals. Speak to the supplier, check our policy and contact the Conflict Minerals Team to confirm if the tin comes from a covered country. If it does, sever the relationship immediately.*



## CAUTION.

**Protecting team member rights.** *You're visiting a potential supplier and notice that a lot of their Supply Chain Team members seem underage. You notify your boss and the Supply Chain Team. Right decision? Yes. At Tenneco, we stay on the lookout for possible human rights abuses and speak up if we ever see something suspicious. Just be sure to also remove them from your list of potential suppliers until an investigation is complete.*

**Getting paid fairly.** *Your vendor is behind schedule and asks its team members to work over the weekend. The vendor is not going to pay them overtime so that your costs don't increase, and you can meet your budget. That should be OK, right? Maybe. If the team members get paid hourly, they may be legally entitled to overtime. The vendor should pay that overtime even if he doesn't pass the cost on to you. We don't want to work with companies that mistreat their team members. Talk with your manager and discuss whether any other locations are using this vendor. More action may be needed.*



## WRONG WAY.

**Ignoring bad behavior.** *You see a story on social media about one of our vendors discriminating against women and minorities. Since it doesn't involve Tenneco, you ignore it. Any issue? Yes. Our vendors represent us. We choose them as our business partners, and if they act unethically, our relationship with them could suggest that we support their bad behavior. We don't. We always operate with integrity. If there is even a hint of something improper or illegal, speak up immediately so the relationship can be re-evaluated by the right people.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### What should I look out for when working with other parties?

We expect everyone who works with us, for us, and on our behalf to:

- Promote diversity and inclusion.
- Pay fair wages.
- Ensure safe working conditions.
- Treat everyone equally.
- Protect workers from physical punishment and forced labor.
- Fight against child labor and human trafficking.
- Honor our Core Values and the law – never compromising either to save money.



## THE GARAGE

Supplier Code of Conduct  
Human Rights Statement

# PROTECTING THE ENVIRONMENT

## The Destination

Understanding that “how” we do things is as critical to our success as “what” we do.

## How We Get There

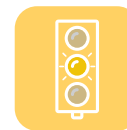
We are committed to making tomorrow better. That means we protect the planet, conserve natural resources, and prevent pollution.

Contribute by always looking for ways to improve operations, recycle materials, and help customers make more sustainable choices when shopping our products and services.



### ROLE MODEL OF ETHICAL BEHAVIOR.

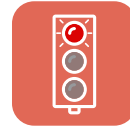
**Minimizing your footprint.** *You identify a way that we could reduce 40% of our energy usage in the plant. It's not part of your job responsibility but you mention it to your boss. Good idea? Of course! We are always trying to take care of the land that takes care of us. If you find a way to preserve natural resources or reduce waste or emissions – speak up.*



### CAUTION.

**Noticing the little things.** *A recent change on the line has increased quality but scrap has also increased by 200%. Any problem with that? Over time, yes. Communicate to the right people in the plant so that they can determine why the amount of scrap has increased and identify ways to reduce or recycle.*

We meet or exceed  
environmental standards for all  
products in our supply chain.



## WRONG WAY.

**Ignoring potential dangers.** You notice that one of our storage containers is leaking a harmful fluid. Instead of saying something, you just use another container instead. Right choice? No. You should have spoken up. Doing so could have prevented the spill and any associated environmental harm.



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Tips for preserving natural resources:

- Conserve water resources.
- Reduce waste.
- Conserve energy.
- Reduce packaging.
- Source responsibly.



## THE GARAGE

# GIVING BACK TO THE COMMUNITY

## The Destination

Having a positive impact on the communities around us.

## How We Get There

Each one of us has the power to make a difference. We encourage you to always keep that in mind and give back to the community in ways that are personally meaningful to you.

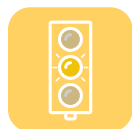
Also, remember that when we pool our time, talent, and resources together as a company, we can go further. Through fundraising and volunteering, we can change the communities where we live and work for the better.



## ROLE MODEL OF ETHICAL BEHAVIOR.

**Be a catalyst.** *You want to raise funds for a local community organization that supports diversity initiatives, so you check in with your manager to organize a fundraiser and volunteer day. Right choice? Absolutely. We promote inclusion and diversity, and this is one way to do that. If you volunteer outside of work, make sure your participation won't negatively affect your job or present a conflict. Speaking with your manager first may be the best way to do that.*





## CAUTION.

**Asking first.** *A customer asks you for a charitable donation for a cause that they support. You want to support the community and improve your relationship with the customer. Is that OK? Maybe. Speak to a manager or someone in Human Resources to make sure. While we want to support our communities, the charity needs to be researched to ensure it is legitimate and aligned with our commitment to integrity. You may find this hard to believe, but sometimes charities are used to pay kickbacks or bribes.*



## WRONG WAY.

**Mixing business with personal.** *You are involved in a personal charitable activity and want to use Tenneco's letterhead to solicit some of our suppliers for contributions. Is that OK? No. Before using Tenneco's letterhead you must get approval. Discuss the initiative with the Communications Team and understand how Tenneco would engage with you in soliciting our suppliers for personal charitable activities to avoid possible conflict of interest – or at least the appearance of one. Our relationships with suppliers should be based on business only.*



## LEAD THE WAY (TIPS FOR KEEPING YOUR LICENSE)

### Tips for giving back:

We are proud of the personal charitable commitments many of our team members have as well as some of the commitments we've made as a team.

- Please contact the Communications Team or Human Resources for evaluating other opportunities for the company to support charities.



## THE GARAGE



# GETTING YOUR LICENSE

There you have it – the information you need to earn your **License to operate at Tenneco**. Thank you for taking the time to read our Code and for all you do to support our continued success. Thank you for speaking up when you have ideas, questions, and concerns.

Understanding our Code is key to going the distance at Tenneco. It fuels our Purpose and Core Values and provides direction to our ultimate destination: operating our business with integrity.

If you're ready, meaning you've read, understood, and will follow the Code, sign your name below:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

You are now **Licensed to operate at Tenneco**. Please provide this signed page to your HR Representative.

LICENSE TO OPERATE AT **TENNECO**

IF YOU SEE OR SUSPECT  
A VIOLATION OF:

- OUR CORE VALUES OR CODE
- OUR POLICIES AND PROCEDURES
- ANY LAW OR REGULATION

**YOU CAN CALL THE TOLL-FREE  
Tenneco Hotline 24/7**

*Write in your local Hotline number above.*

or go to <https://secure.ethicspoint.com/domain/media/en/gui/29312/index.html>

All calls will be treated on a confidential basis according to the local laws.

REMEMBER "DO THE RIGHT  
THING THE RIGHT WAY"

If you become aware of an ethics problem or wrongdoing, it is your responsibility as a Tenneco team member to report it. Speak up!

LICENSE TO OPERATE AT **TENNECO**

Print out wallet card, cut to size, and fold at dotted line.