

# Code of Conduct

## Message from the CEO

Dear employee,

Values and ethics are increasingly important when doing business. NCAB Group is a global producer of printed circuit boards, PCBs. Our vision is to be “The number 1 PCB producer wherever we are”. This means that we must apply a responsible approach in everything we do, socially, environmentally, and ethically. Our company values: *Quality first, Strong relationship and Full responsibility* are what we work according to.

The sustainability commitment is deeply rooted in our culture and all NCAB Group’s employees share a responsibility for how we act in relation to our customers, our owners, our suppliers, and colleagues. NCAB has therefore issued the code of conduct as a set of ethical guidelines and principles for how we do business, how we treat our customers and what behavior we expect from our employees. It is also what our employees can expect from NCAB Group. At the end of the day, it is how we like to do successful business in the long run.

Sincerely,  
Peter Kruk,  
Chief Executive Officer

## Purpose and scope for this Code of Conduct

The Code sets out the framework for how our employees are expected to act and behave. The requirements on our social responsibility is based on the framework ISO 26 000 that we follow and compliance with ethical principles based on internationally widely accepted regulations and norms and UN Global Compact (<http://www.unglobalcompact.org>).

NCAB Group requires all employees to take due notice, accept and comply with the Code of Conduct. Moreover, we expect our suppliers to adhere to our supplier code of conduct in their own business activities.

## **Business ethics**

Values and ethics are increasingly important when doing business and NCAB Group has defined the most important areas that we refer to as our business ethics.

### *Business relation, bribery, and fair competition*

NCAB has zero-tolerance towards illegal business behaviour. We are committed to working against corruption in all its forms, including bribery, corruption, fraud, extortion, and money laundering. Our aim is to be better than our competitors by outperforming them, never through unethical or illicit business practices. Protecting NCAB's reputation is very important, and we therefore never do business with anyone who could possibly damage our brand and reputation.

We do not tolerate any giving or receiving of gifts, hospitality or other deemed as improper payments and favours that could affect the course of our business decisions. What does or does not seem to be a bribe is complex. To protect our employees and NCAB from accusations of bribery, you are not allowed to offer/accept gifts, hospitality or reward to/from third party if doing so may be in violation of the law. Any such offering must immediately be reported to your closest manager, if there are reasons to suspect that this could affect your professional judgement or if it could appear to do so from an outside point of view.

### *Human Rights*

We support and respect the protection of human rights and freedoms, as being proclaimed in the Universal Declaration of Human Rights. We also support and respect other human rights declarations, such as the European Convention for the Protection of Human Rights and Fundamental Freedoms.

Conflict minerals are minerals that are linked to systematic violence and human rights abuse in certain conflict areas. NCAB Group has a policy on a conflict-free mineral supply chain. Some of the metals used in the PCB productions are minerals considered as a typical mineral that could be from a conflict area. We therefore require that no conflict minerals are being used in our production by collecting a similar policy as ours from our suppliers and a signed assurance that no conflict minerals are being used. Furthermore, we collect declarations of due diligence used within the supply chain.

### *Conflict of interest*

No employee may be involved in an activity or hold a position outside NCAB that is in conflict with the company's business interests. Such conflicts of interest could also include executive posts, significant shareholdings or the employment of family members.

### *Intellectual Property*

We are aware of any information we receive from our customers, whether in electronic or other format, and which is used to support the manufacture and/or procurement of their product, is the sole property of the customer. We recognize and agree that this information is strictly confidential and shall not be reproduced, shared or transmitted to a third party without permission of said customer.

### *Insider information*

Insider information is information about circumstances which are not yet public and, if they were publicly known, would likely affect the price of a financial instrument. No employee, connected or deemed to be connected, shall use any material un-published price sensitive information to gain personal benefit through buying and/or selling the company's shares.

### *Confidential information and privacy*

Confidentiality is always recognized and maintained by us with regard to customer information and commercial secrets of our business partners. The communication of confidential information to third parties or the public is prohibited. The obligation to observe confidentiality continues to apply after the end of employment for all employees.

At NCAB Group we protect reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. We comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

### **Our employees and working conditions**

To be an appealing employer and keep motivated and engaged employees it is important for us to focus on the working environment in many ways. Our long-term goal is to attract, keep and develop the best employees. It is therefore very important to address values for our employees in their work life at NCAB Group, for policy see our internal HR-policy.

#### *Well-being, work life balance and compensation*

We believe in keeping a healthy work life balance and well-being to be able to attract and retain the right people. There is an important on-boarding program that each new employee shall be able to go through. Working hours are not to exceed the maximum set by local law and our employees have the right to healthy and safe working conditions. Our talented employees shall be compensated according to all applicable wage laws, including those relating to minimum wages.

#### *Diversity and inclusiveness*

Diversity is highly valued by NCAB Group and it is our competence that matters, not where we come from, look, age, religion, political opinion, nationality, ethnic background, social origin, disability or sex. We therefore always show understanding and tolerance towards each other and our personal differences and the equality between men and women is a given within the NCAB Group.

#### *Harassment and non-discrimination*

NCAB Group do not tolerate any involvement in non-professional behavior or complicity concerning harassment under any circumstances or for any reason. Any action that prevents personal development, in any way infringes on the well-being of an individual or could be construed as harassment, bullying or abuse must never take place at NCAB. Any allegation of discriminating treatment or harassment will be treated seriously, regardless of the seniority of those involved. Every employee has the right, without fear of reprisal from anyone, to inform his or her manager of conditions or treatments that feel inappropriate and can always expect the concerns to be taken seriously.

#### *Child labor, young workers and forced labour*

We do not accept employment of children. We ensure that adequate and verifiable methods for age verification are used in the recruitment procedures. In no cases, whatsoever, are we going to employ a person below the age of 15 (or what the law of the country permits). Workers under the age of 18 shall never perform hazardous work. Furthermore, we must not be involved with, use, allow or take advantage of any form of forced or compulsory labor, slavery, servitude, human trafficking or labor as a form of abuse.

#### *Freedom of association*

We support and respect the right of association for all our employees. Employees may freely choose to join, or not to join, any trade-union or similar external organization. We confirm that our employees, maintaining good faith, will have the right to make collective bargaining.

### **Environmental responsibility**

By making environmental risk-assessments in our business operations, we agree to maintain a preventive approach to questions concerning the environment. We are working closely with our customers to support product development and design to be more environmentally friendly. The PCBs use different material and substances in the production and it is at the heart of our own environmental work with our suppliers. We are always committed to comply with laws and regulations. More information about environmental responsibility is to be found in our environmental policy.

We strive to get suppliers to use natural resources mindfully and responsibly throughout all aspects of the operations. Furthermore, we strive to minimize, categorize and monitor all sources of pollution and waste to air, water and land. When handling substances that are classified as hazardous to the environment we must ensure that our suppliers handle them safely when transported, stored, recycled, and/or disposed.

## **Upholding the code**

### *Responsibility and follow-ups*

This Code of Conduct is approved by Peter Kruk, CEO. All employees should have a good knowledge of our Code and other policies relevant to their jobs as well as application of them in their everyday duties. Managers have the responsibility to engage in ethical issues and translate this Code and other associated governing policies into local rules and procedures.

All employees and other stakeholders who suspect a potential breach of this Code of Conduct shall report the matter to the relevant manager or through NCAB Group whistleblower function at [www.ncabgroup.whistleblower.eu.com/](http://www.ncabgroup.whistleblower.eu.com/). No employee acting in good faith will be subject to disciplinary measures, retaliation, harassment, discrimination, or an adverse employment consequence, for providing information regarding suspected violations of law or company policy.

If the requirements set herein in this Code of Conduct are not met at the workplace, adequate corrective measures will be taken. If any breach of this Code of Conduct, employee's contract or any local governing policies may result in disciplinary action.

### *Employee affirmation*

I have read and understand the NCAB Group's Code of Conduct. I will take appropriate steps to ensure effective compliance with this Code and with the laws, regulations and other relevant policies that apply to my responsibilities at NCAB Group.

If I have a concern regarding a possible violation of this Code or the law, I will report my concern to my manager, or any other appropriate representative of the company.

Date \_\_\_\_\_

Name \_\_\_\_\_