

Mycronic Group Code of Conduct

Approved at board meeting 2021-05-05

1 Introduction

The purpose of this Code of Conduct is to ensure high ethical standards regarding business conduct whilst protecting human rights, promoting fair employment conditions, ensuring safe working conditions and responsible management of environmental issues. This Code of Conduct is based on the Ten Principles of the UN Global Compact.

In addition to compliance with all relevant laws, regulations and standards in the countries in which we operate, all Mycronic companies, their employees and consultants shall comply with this Code of Conduct which applies also when it stipulates a higher standard than required by national laws or regulations.

Mycronic requires business partners, including suppliers, sales agents and distributors and their sub-contractors to comply with a separate Code of Conduct.

The Code of Conduct is a summary of the standards and principles of conduct expected of all employees and consultants. The Code of Conduct is supplemented by more detailed policies and directives in defined areas which can be found in the Mycronic Global Management System (GMS).

The Code of Conduct shall be applied throughout Mycronic's operations worldwide.

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2. Representing Mycronic

Mycronic employees and consultants have an important role in maintaining Mycronic's reputation as a highly trustworthy and professional company to be proud of.

Acts in violation of the Code of Conduct is likely to damage Mycronic's reputation and may lead to legal action against the company and its representatives. It may also be a breach of the terms of employment, which is based on confidence and loyalty.

Mycronic employees and consultants might be confronted with complex situations where the Code of Conduct does not give a clear answer, if so the matter shall be discussed with the nearest superior or HR department.

All work-related issues or concerns may always be raised with the nearest manager, preferably as soon as possible after they arise. The employees shall also feel free to raise the issue with the manager's manager or a Human Resources manager. It is also possible to report anonymously through Mycronic's whistleblowing system (see Section 9).

In the following, each time the expression "Mycronic" is used, it is all employees' and consultants' responsibility to observe the identified undertaking and act accordingly at all times.

3. Brand principles – our rules to live by

Mycronic company brand principles interacts with the Code of Conduct and governs Mycronic's way of working.

Proactive, customer centric approach

- Strengthen relationships by being open, transparent and sharing knowledge
- Stay curious and ask questions
- Know what value means to every customer and deliver on it
- Keep promises

Dynamic, people centric culture

- Encourage innovation, development and personal growth
- Openly share knowledge and ideas
- Actively explore and collaborate with colleagues & customers
- Be accountable for challenges, successes and results

Purposeful innovation

- Design high quality solutions around the people who use them
- Gather insights, from across functions and diverse backgrounds
- Experiment, learn and adapt solutions to enable the customers' business
- Anticipate customers' future needs to ensure sustainable solutions with long product lifecycles

Sustainability mindset

- Explore and share ideas on sustainable developments, and collaborate to drive change
- Invest in innovations that reduce environmental impact in ours and our customers' operations
- Contribute to an inclusive and healthy work environment by embracing diversity and showing compassion for colleagues
- Stand up and speak out against illegal and unethical business practices the moment you meet them

4. Human and Labor Rights

Mycronic shall support and respect the protection of human and labor rights. All employees and consultants shall be part of a fair and ethical workplace and treated with dignity and respect.

4.1. Human Rights

Mycronic shall:

4.1.1 support and respect fundamental human rights and not be complicit in human rights violations within its sphere of influence,

4.1.2 carry out human rights due diligence as appropriate to the size, the nature and context of operations and the severity of the risks of adverse human rights impacts.

4.2. Fair Employment Conditions

Employees and consultants shall understand their assignments, terms and conditions. Written documents outline the basic terms and conditions in a language understandable to the individual.

The terms of the employment and working hours shall be fair and reasonable and comply with applicable local laws and collective agreements. Mycronic pays employees at least the minimum wage and applicable overtime wages defined by national laws or any applicable collective agreements. Deductions from wages as a disciplinary measure shall not be permitted.

4.3. Equal Employment Opportunities and Non-Discrimination

Diversity is a valuable asset for Mycronic. Mycronic encourages differences between people and everyone's equal opportunities. No one shall be discriminated due to ethnicity or national origin, gender, sexual identity or orientation, family status, pregnancy, age, disabilities, union membership or employee representation.

Neither shall discrimination occur due to culture, religious or political beliefs, professional background or any other characteristic or factor protected by local law.

4.4. Prevention of Child Labor, Modern Slavery and Trafficking

No person who is below the minimum legal age for employment shall be employed or engaged. Minimum age is the age of completion of compulsory schooling, or not less than 15 years, or not under the minimum age for employment in the country, whichever is greatest. Employees under the age of 18 shall not perform night shifts, overtime and alike which could jeopardize their health or safety.

Mycronic does not accept the use of any kind of involuntary or forced labor, whether in the form of indentured labor, bonded labor or other forms. Mycronic prohibits mental and physical coercion, slavery and human trafficking.

4.5. Health and Safety, Anti-Harassment and Anti-Abuse

Health and safety are important and Mycronic works pro-actively to eliminate accidents, illnesses and injuries. Mycronic shall fulfill all applicable local legal occupational health safety regulations, which includes having emergency preparedness and response procedures in place. Sound safety practices shall be carefully followed in all Mycronic workplaces. To protect Mycronic employees, the public, and our communities all business activities shall be conducted under proper safety precautions.

Mycronic shall work to increase its employees' awareness of health and safety and shall ensure that its employees have received appropriate occupational health and safety training. Workers shall be provided with appropriate personal protective equipment and receive information and training regarding the use of hazardous or toxic substances in the workplace, when relevant.

Mycronic is committed to providing a workplace free of harassment and abuse. Any form of harassment, corporal punishment, bullying, physical, mental, sexual or verbal abuse or other cruel or abusive disciplinary practices in the workplace is prohibited.

Mycronic prohibits the illegal use or possession of alcohol, drugs and other controlled substances.

4.6. Freedom of Association

Mycronic fully recognizes employees' freedom of association and right to bargain collectively. Representatives for trade unions shall not be subjected to any discrimination.

5. Business Ethics

This Code of Conduct outlines the minimum business ethical standards and expectations that Mycronic requires its employees and consultants to comply with. All employees and consultants of Mycronic shall be required to conduct the business responsibly and always in accordance with applicable laws and regulations and good business practice.

5.1. Anti-Corruption, Anti-Bribery, Anti-Trust and Anti-Money Laundering

Mycronic has a zero-tolerance policy towards any form of corruption and financial irregularity, for example bribery, facilitation payments, fraud, money laundering, extortion or embezzlement. Suspected behavior shall be reported and investigated.

Payments or other benefits to public officials or private sector employees and/or their family members with the aim of obtaining or retaining advantages shall be prohibited. In addition, no one representing Mycronic may, directly or indirectly, ask for or accept any kind of bribe, kickback or any other unlawful or unethical benefit.

Mycronic shall conduct its business in full compliance with all applicable anti-trust and fair competition laws.

5.2. Gifts, Offerings and Avoiding Conflict of Interest

Mycronic always makes business decisions on objective grounds, and never based on personal benefits. A conflict of interest arises in any situation where there may be a suspicion that a personal interest has prevailed.

Gifts, benefits, reimbursements or entertainment that might constitute a conflict of interest or violation of law shall not be offered or accepted.

Upon questions of a gift or offer is appropriate or not, the nearest manager and/or advice from Mycronic Legal department shall always be consulted.

5.3. Documentation of Policies and Business Activities

All business dealings shall be transparently performed and accurately reflected in Mycronic's policies, business books and records.

Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Standards of fair business, advertising and competition shall be upheld.

5.4. Intellectual Property

Intellectual property rights are of great importance to Mycronic and shall always be respected and protected. This is essential in all parts of the business chain and in all work for Mycronic.

Mycronic's customers' and suppliers' intellectual property rights shall also always be respected.

5.5. Privacy

Mycronic respects the privacy of individuals. When obtaining and processing personal data, Mycronic complies with applicable personal data laws and regulations on the processing of personal data and ensures adequate level of data protection for both employees and customers. This topic is further elaborated upon in Mycronic's Privacy Policy.

5.6. Customs and Trade Restrictions

Mycronic shall:

conduct all transactions in accordance with applicable export control and customs laws and regulations. Mycronic employees and consultants shall ensure that export or import of any Mycronic merchandise, samples, spares, replacement parts, or software, by shipment, mail, courier or other means, only shall be approved by employees designated to clear the import or export,

conduct all business in compliance with laws, regulations and trade restrictions imposed by the sanctions authorities e.g. governments, international organizations (such as the United Nations) and supranational bodies (such as the European Union),

not export any goods or provide services to any party or customer if Mycronic knows or has reason to believe that the Mycronic item will be used or retransferred in a manner contrary to applicable export control or trade sanction laws and regulations or if the party, or any other party to the transaction, is listed in connection with such trade sanctions program or other applicable list of proscribed individuals or entities.

5.7. Conflict Minerals

Mycronic strives to ensure that the sourcing of minerals and metals do not, directly or indirectly, finance or benefit armed groups or cause or contribute to human rights violations. As part of Mycronic's commitment to responsible sourcing, due diligence shall be exercised with respect to the sourcing and extraction of raw materials from conflict affected and high-risk areas, including tin, tantalum, tungsten and gold, used in products. The due diligence shall be consistent with relevant parts of the OECD Due Diligence Guidance or equivalent processes.

6. Environment

Mycronic is committed to sustainable development and excellent and sustainable performance of its activities, products and services.

Mycronic shall comply with all environmental laws, rules and regulations in all the countries in which the company operates.

Energy, materials and natural resources shall be used efficiently, and waste and residual products shall be minimized.

6.1. Precautionary principle

Mycronic applies the precautionary approach to reduce or avoid negative impacts on the environment.

Chemicals and other substances, materials, methods and processes posing environmental and health risks shall be avoided, risks evaluated and managed and suitable alternatives selected when not unreasonable from the business perspective.

Appropriate methodologies shall be used to determine significant issues, aspects, risks and opportunities, for setting and reviewing objectives and targets, and as a basis for communicating sustainability performance of our operations, products and services.

6.2. Initiatives to promote environmental responsibility

Knowledge, experience sharing and collaboration with colleagues and stakeholders are important factors to be successful in environmental work.

All employees shall actively seek information about the environmental impact of our products, services and activities and contribute with ideas and actions to reduce environmental risks and improve environmental performance. Caring about the environment shall be a natural part of daily business.

Environmental responsibility and ownership in relation to sustainability issues shall be an integral part of business processes throughout the value chain.

6.3. Environmentally friendly technologies

Mycronic shall continuously reduce its environmental impact by implementing systematic ways of working and responsible business practices and standards that go beyond legal compliance. Environmentally friendly technologies, processes and solutions that reduce the environmental footprint shall be actively considered and encouraged.

7. Being a Listed Company

As a Swedish listed company, Mycronic follows the EU Market Abuse Regulation ("MAR") and Swedish insider legislation. Insider information refers to all types of non-public information and/or knowledge of circumstances which is likely to have a significant effect on the share price if it became publicly known. Persons holding insider information which would have an expected impact on the share price shall not be permitted to trade, or recommend anyone else to trade, in Mycronic shares or other Mycronic instruments as long as they hold this information.

Mycronic has identified a narrow circle of individuals regarded as Persons Discharging Managerial Responsibilities ("PDMR"s) due to their position and constant access to insider information. These PDMR's cannot trade, or recommend anyone else to trade, during so called closed periods (30 days before any quarterly report) and the PDMR's and their related parties must report their transactions in Mycronic instruments to Mycronic and the Swedish Financial Supervisory Authority. Furthermore, Mycronic keeps a log book when insider information on a specific occasion is subject to delayed disclosure. However, according to Swedish legislation, everyone who receives or has access to insider information must respect the prohibitions on trading and on unauthorized disclosure and is responsible for following Mycronic's insider and communication policies. These general prohibitions apply to all individuals, employees or any others, who hold insider information and they include a prohibition for employees to recommend anyone else to act on such insider information.

Communication with shareholders shall be done in an open and transparent way in accordance with laws and regulations to ensure fair valuation in the market.

8. Information and Use of Communication Media

Information about Mycronic, its customer and business partners is internal and confidential, unless publicly released. Confidential information shall never be shared unless on a need-to-know basis and under appropriate non-disclosure undertakings.

Company information of a technical, commercial or marketing character is of a particularly proprietary and sensitive nature.

This applies not only to intentional exposure of confidential information, but also to the risk of unintentional disclosure. For example, never discuss company matters with colleagues while travelling, in public spaces or in the social media sphere.

Disclosing information to a third party, which is detrimental to Mycronic, may violate loyalty obligations following from labor law practice and agreement.

9. Reporting Non-Compliance – Whistle Blowing

The Code of Conduct plays an essential role in creating a culture of responsibility and commitment to Mycronic's brand principles. It is the responsibility of Mycronic's managers to implement this Code of Conduct and inform their employees of their rights, duties and responsibilities.

All employees are expected to report to the nearest manager any observed or suspected violation of law or Mycronic Code of Conduct. Or, when appropriate, report to the manager's manager and/or HR.

In case of violations concerning accounting and financial reporting, insider trading, corruption or other areas of vital importance to Mycronic's business or the health and safety of individuals, violations may be reported confidentially and anonymously via Mycronic's whistleblowing system. Please see Mycronic Whistleblowing Policy or visit <https://report.whistleb.com/mycronic> for more information on how to use the whistleblowing system.

The anonymity of the whistleblower will be maintained. The reported violation will be investigated and judged in conjunction with a fair and rigorous application of this Code of Conduct.

10. Feel Safe Principle

Reports shall be made in good faith, which does not mean that the questioned behavior has to prove being wrongful. However, the reporting shall be based on an honest belief that the information put forward is truthful and appropriate as far as known at that time.

The Mycronic Feel Safe Principle is to emphasize that anyone who seek guidance, or report in good faith, on ethical or compliance issues related to law or the Code of Conduct shall not be discriminated against or punished.