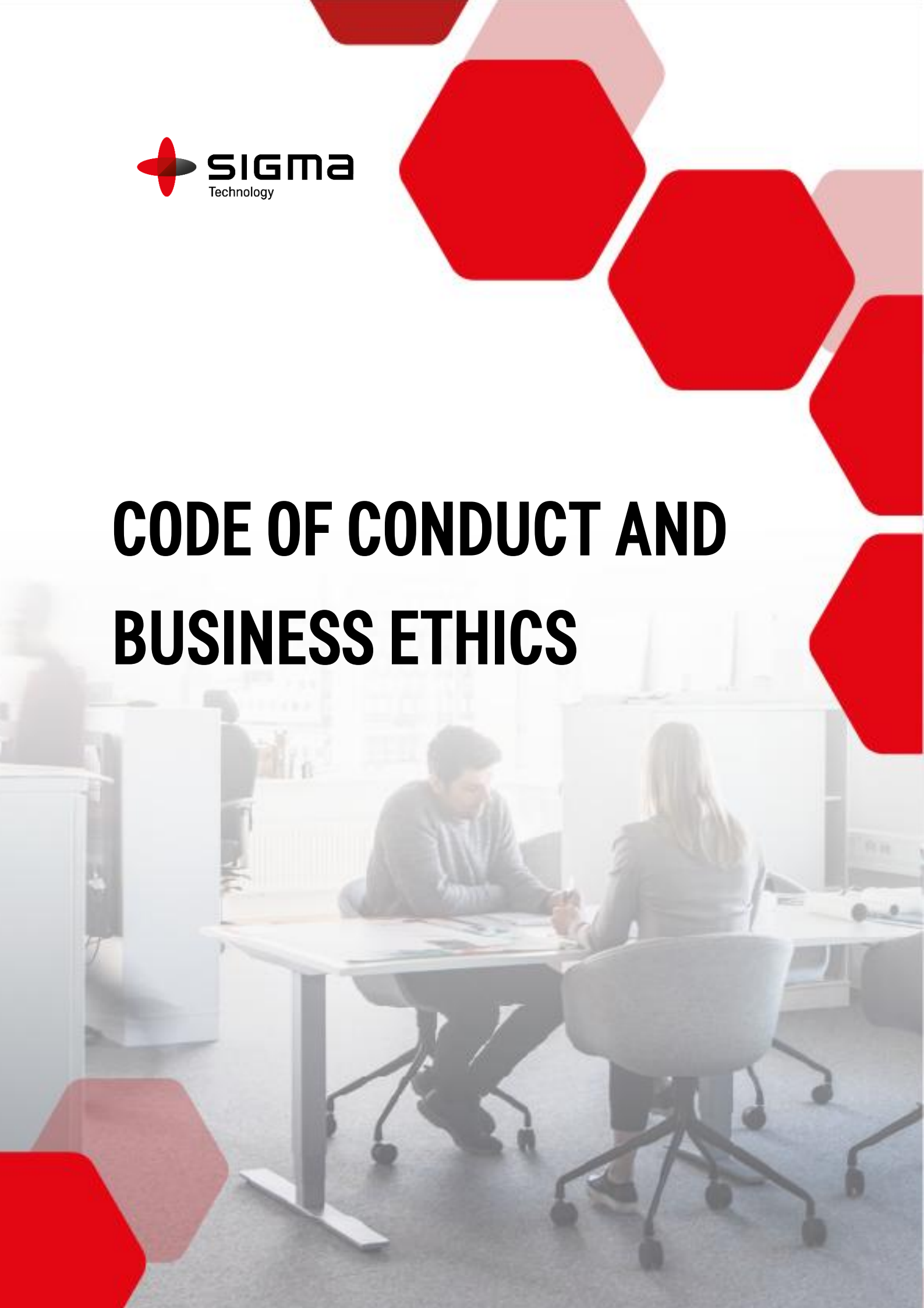




CODE OF CONDUCT AND BUSINESS ETHICS



As one of the main suppliers to global industry, Sigma Technology shall behave in a socially and ethically correct way. We believe that we are responsible for people who take part in the production and support of our services and products worldwide. We believe that people whose work contributes to our success should not be deprived of basic human rights, nor be forced to suffer physically or mentally from their work in any way.

PURPOSE

Sigma Technology expects clients and suppliers to respect human rights, and to treat their workforce fairly and with respect. In order to make our position clear to our employees, our suppliers, our clients, and other affected parties, we have created this Code of Conduct and Business Ethics.

APPLICATION

The Code of Conduct and Business Ethics is applicable to all Sigma Technology operations as well as to our suppliers and co-workers.

POLICY

Sigma Technology targets world leading companies who require not only top-quality deliveries but also a supplier that is able to drive innovation with a strategy to follow our customers globally.

Our objective is to provide services within Product Information, Embedded & Software Design, Information Management, and Smartshore. We deliver best-in-class services, solutions, and quality to our customers.

Our overall operational strategy is to build trust that makes us reliable and attractive as a company. The goal is to get sustainable growth with satisfied customers and employees. This will be achieved through:

- Superior supplier value
- Superior employment

Sigma Technology works to:

- Contribute to a sustainable environment by complying with current legislative and other demands, promoting a more efficient use of resources, and pollution prevention within our assignments and the business group.
- Protect the information assets of our customers and our organization and Prevent interruptions in our IT by having an up-to-date IT infrastructure.
- Secure compliance with relevant external standards by continuous improvements of the management system.

Sigma Technology's policy is long-term but must be re-evaluated by management once a year.

DIRECTIVE

1. OBLIGATION TO INFORM

This is an open document and should be shared with anyone whose work contributes to our products and services. They should be aware of the principles of the Code of Conduct and Business Ethics. It is the responsibility of suppliers to ensure that their employees and subcontractors are informed about, and comply with, this Code.

2. LEGAL REQUIREMENTS

All our suppliers must obey national and regional statutory requirements in the countries in which they are operating. If any requirement in this document is in violation with the law in a country or territory, the local law should always take precedence. In such cases, the supplier must inform Sigma Technology as soon as possible.

3. WHISTLEBLOWING

At Sigma Technology, we strive to have an open and transparent workplace, where wrongdoing does not occur. Our whistleblowing channels enable confidential communication with us in which a person can anonymously report misconduct without risking retaliation.

4. ZERO TOLERANCE OF ALCOHOL AND DRUGS

Sigma Technology does not accept anyone working under the influence of drugs and alcohol.

5. BUSINESS ETHICS

Sigma Technology values the importance of highly ethical business practices. We stand for transparency and honesty. Corruption, extortion, and bribery involves risks that can have a harmful impact on business and society. Therefore, Sigma Technology has created an anti-corruption policy as well as being involved with different initiatives promoting transparency and business ethics.

5.1 Corruption, extortion, and bribery

We do not accept any type of corruption, extortion, or bribery. Instead, we should contribute to creating a great trust in companies in society. Our goal with anti-corruption work is to promote a high level of business ethics as well as to counteract bribery and other forms of corruption. Our anti-corruption work is based on the UN initiative “the fight against corruption” program.

5.2 Fair competition

Sigma Technology believes in free and open competition. Therefore, employees, suppliers, and subcontractors are responsible for maintaining fair competition. It is also important that competition laws, regulations, decrees, and orders are complied with.

5.3 Conflict of interest

Employees should ensure that nothing interferes with their ability to make business decisions in the best interest of our company. This means that nothing employees do should interfere, or appear to interfere, with the responsibility that decisions should be taken objectively and unbiased.

5.4 Intellectual property

Sigma Technology has an obligation to identify and protect the intellectual property owned by us, our customers, and business partners. To protect intellectual property, it is important that it is only shared with authorized parties.

5.5 Disclosure of information

We want to preserve the integrity between our company and our customers. This means that information that is considered sensitive, non-public, and/or confidential should be handled with care. To ensure this, personnel should not spread this information. It is very important that we prevent leaks and dissemination of sensitive information at a company level. Sigma Technology respects all legal and contractual policies for confidentiality. We ensure that non-disclosure agreements are signed which creates a safer environment for confidential information.

5.6 Financial Responsibility

Sigma Technology follows the IFRS which ensures that our financial reporting and accounts are correct. We carry out financial activities according to applicable regulations and laws.

5.7 Export controls and economic sanctions

Sigma Technology takes responsibility for whom we engage with in business. We follow the trade sanctions and export control laws and regulations that apply to our business.

6. WORKERS' RIGHTS

6.1 Basic human rights

Anyone who works directly or indirectly for Sigma Technology should be entitled to his or her basic human rights.

Sigma Technology does not accept the use of bonded workers, forced labor, prisoners, illegal workers, or other types of modern slavery. No worker employed by any suppliers should be required to remain in their employment against their will. The employer covers all commissions and fees to recruitment agencies. Recruitment practices must prohibit any fees or costs charged to workers for employment. Sigma Technology and its suppliers must identify, manage, and monitor risks of worker exploitation, such as debt bondage, particularly when using recruitment agencies or brokers. Neither Sigma Technology nor any labor hire agencies acting on its behalf may withhold money or identification documents belonging to workers, before or after the start of employment.

We do not accept that workers are subject to corporal punishment, harassment, or mental/physical disciplinary action. Dismissal of workers due to pregnancy is not acceptable. Workers should have freedom of association and collective bargaining of their own choosing.

No worker should be discriminated because of age, race, gender, religion, sexual orientation, marital status, political opinion, or ethnic background. All workers with the same experience and qualifications should receive equal pay for equal work, with regard to local terms and conditions of each individual country. The recruiting process should be performed in an ethical way.

Sigma Technology values diversity and wants to attract talent from all over the world. An important aspect of Sigma Technology's diversity work is to ensure an inclusive, productive, and safe environment for all employees.

6.2 Rights to land and natural resources

We commit to managing rights to land and natural resources responsibly across all operations and our supply chain, in line with UN principles. We avoid and manage adverse impacts on communities, including indigenous peoples, and determine legal or customary land rights before any activity. We require free, prior, and informed consent (FPIC) from Indigenous Peoples and local communities prior to commencing operations, ensuring transparency and respect for human rights throughout our practices.

6.3 Wages and working hours

All workers should know the basic terms and conditions of their employment.

Legislated minimum wages should be a minimum, rather than a recommended level. Wages should be paid regularly and on time, and no unlawful wage deductions or payments by workers are permitted. Work time should not exceed the legal limit.

Workers should be granted stipulated annual leave, sick leave, and paternity leave without any form of repercussion. Subcontractors and suppliers must follow international conventions and national law concerning conditions for their employees.

7. SAFETY

7.1 Building safety

Sigma Technology requires that worker safety is always a priority concern. All indoor premises must have clearly marked exits and emergency exits on all floors. Exits should not be blocked and must be visible. All workers should be informed of the safety procedures. Evacuation plans should be clearly displayed on every floor of a building and the fire alarm should be tested regularly. Evacuation drills should be conducted regularly.

7.2 First aid

First aid equipment must be available in every building and at least one person in each department or similar should be trained in basic first aid.

8. WORKPLACE CONDITIONS

It is important for all workers' wellbeing, that hazardous materials are handled in a safe and correct way. All chemicals shall be marked and labeled correctly. Training and instructions for handling chemicals must be performed and workers must have adequate protection.

The work environment is regularly reviewed with the purpose of identifying risks in the physical and psychosocial work environment. This enables Sigma Technology and/or the customer to improve the work environment.

The temperature and noise level of the work environment should be tolerable. Ventilation should be adequate. Lighting should be sufficient for the work performed. The workplace should have an adequate number of clean sanitary facilities. Workers should have access to these facilities without unreasonable restrictions.

9. HOUSING CONDITIONS

Where staff's housing facilities are provided the worker's safety must be a priority concern. The recommended safety and workplace conditions described above are applicable to these housing facilities. All workers should be provided with their own individual bed and living space per worker must meet minimum legal requirements.

Dormitories, toilets, and showers should be separated for men and women. There should be no restrictions on workers' rights to leave the dormitory during off-hours.

Fire alarms, fire extinguishers, unobstructed emergency exits, and evacuation drills are of particular importance in dormitory areas.

10. ENVIRONMENTAL ISSUES

The environment is of great concern globally and Sigma Technology expects its suppliers to comply with applicable environmental laws and regulations and fulfil the terms of Sigma Technology's environmental requirements.

10.1 GHG emissions

We strive to follow the UN's goal to reduce emissions and follow applicable laws for reporting of emissions. Sigma Technology has set goals for the reduction of GHG emissions.

10.2 Resource consumption

Sigma Technology works to have a sustainable way of managing our resources and encourages our suppliers to do the same. Thereby we minimize usage of consumables, sort waste, recycle, and dispose environmentally hazardous waste in a correct way.

10.3 Energy usage

Sigma Technology strives to reduce our consumption of electricity and energy. The company purchases emission-free electricity and energy when possible.

10.4 Raw materials

Sigma Technology aims for a conflict-free sourcing of our supply chain for raw materials. We encourage our suppliers to have third-party certification adhering to the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" or similar.

11. CHILD LABOR

11.1 Definition

A child in this context is a person younger than 15 years of age, or 14 years of age in accordance with the exceptions of developing countries as set out in Article 2.4. in the ILO Convention No. 138 on Minimum Age.

Note: In China, a child, in this context, is defined as a person younger than 16 years.

11.2 Child labor code

Sigma Technology bases its child labor code on the UN Convention on the Rights of the Child, article 32.1.

We “recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral, or social development.”

11.3 Implementation of our child labor code

Sigma Technology does not accept child labor. We acknowledge that it exists and realize that it cannot be eradicated by simply setting up rules or inspections, but by actively contributing to the improvement of children’s social situations. Thus, we endeavor to improve the situation for any child affected by our ban on child labor. Sigma Technology requests that the employer acts in accordance with the overall best interests of the child. A satisfactory solution is whatever improves an individual child’s overall situation. The employer should cover the cost for this.

11.4 Enforcement of our child labor code

Sigma Technology will discontinue cooperation with any party that persists in non-compliance with our child labor code.

11.5 Apprenticeship programs

Sigma Technology accepts apprenticeship programs for children between the ages of 12 and 15 years of age in countries where the law permits such programs, but only under certain conditions. The total numbers of hours spent on light work and school together should never exceed seven hours per day. The employer must be able to prove that work is not interfering with the child’s education, that the apprenticeship is limited to a few hours per day, that the work is light and clearly aimed at training, and that the child is properly compensated. We will not accept apprenticeship programs that do not comply with these terms.

11.6 Special recommendations

Sigma Technology acknowledges that according to Article 1 of the UN Convention on the Rights of the Child, a person is a child until the age of 18. We therefore recommend that children in the age group 15-18 years be treated accordingly, i.e. by limiting the total number of working hours per day and implementing appropriate rules for overtime. Children in this age group are not allowed to perform hazardous work.

12. MONITORING AND ENFORCEMENT

12.1 The principle of trust and cooperation

Sigma Technology expects all its workers, suppliers and their subcontractors to respect the Code of Conduct and Business Ethics and to actively do their utmost to achieve its intent. We are prepared to cooperate with our suppliers to achieve adequate solutions. We are also prepared to take cultural differences and other relevant factors into consideration, but we will not compromise on the fundamental requirements described in this document.

12.2 Monitoring

All suppliers are obliged to keep Sigma Technology informed about where each order is produced. Sigma Technology reserves the right to make unannounced visits to sites where people work directly or indirectly for Sigma Technology. We also reserve the right to let independent parties do inspections.

12.3 Compliance with Sigma Technology Management System

All suppliers engaged in delivery to Sigma Technology's customers shall comply with relevant parts of the Sigma Technology Management System.