

HITTECH GROUP CODE OF CONDUCT

Policy and purpose

It is Hittech Group's (in this policy also referred to as the Group) policy to comply with all laws, rules and regulations in all the countries in which we operate. This code of conduct also encourages the Group to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics. In no case can complying with the code violate local laws.

The purpose of this policy is to ensure that working conditions in the Hittech Group subsidiaries and their supply chains are safe, that employees are treated with respect and dignity and that business operations are environmentally responsible and conducted ethically. Furthermore, it is to set out the values, principles and responsibilities Hittech Group adheres to and expects from all of its employees, partners, advisors, consultants, contractors, agents and other intermediaries representing us, wherever located. Compliance with this code is a mandatory requirement. Each subsidiary of Hittech Group is responsible for implementing the provisions contained in this code of conduct as well as other company-internal rules for its business area, to actively pursue conformance to the code and its standards and to have it incorporated in its (Quality) Management System.

Hittech Group regards the code as a total supply chain initiative and shall also require its next tier suppliers to acknowledge and implement the code.

Signature: A handwritten signature in black ink that reads "Eric Driessen". The signature is stylized, with a large, looped initial "E" and "D".

Date: 14 April 2021, The Hague

Name: Eric Driessen

Function: CEO Hittech group

This Hittech Group code of conduct is based on the Code of Conduct of the Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC) version 7.0. More information can be found at: <http://www.responsiblebusiness.org>.

The RBA is committed to obtaining regular input from stakeholders in the continued development and implementation of the Code of Conduct. Hittech Group therefore will adopt changes when needed, to stay compliant with the RBA Code of Conduct.

If there are differing standards between the RBA Code and local law, the RBA defines conformance as meeting the strictest requirements. In alignment with the UN Guiding Principles on Business and Human Rights, the provisions in this Code are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights. The recognized standards that were used in preparing this Code are set out in the references at the end.

The Hittech Group code of conduct is made up of five sections.

- A. Labor
- B. Health and Safety
- C. Environment
- D. Business ethics
- E. Management Systems

A. Labor

Hittech Group's commercial success depends to a great extent on its employees. Therefore the Group is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all employees including temporary, migrant, student, contract, direct employees, and any other type of worker. Hittech Group considers it a duty to be an employer that treats its employees in a respectful and fair way. The Hittech Group also expects that its employees treat each other with respect.

The labor standards recognized are:

A.1) Freely Chosen Employment

Hittech Group does not permit forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There is no unreasonable restriction on employees' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, employees' dormitories or living quarters. As part of the hiring process, all employees are provided with a written employment agreement in their native language or in a language they can understand and that contains a description of terms and conditions of employment. When possible, foreign migrant workers receive the employment agreement prior to the worker departing from his or her country of origin. No substitution or change(s) will be made in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work will be voluntary, and employees are free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per employee's contract. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Hittech Group can only hold documentation if such holdings are required by law. In this case, at no time employees will be denied access to their documents. Employees are not required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by employees, such fees will be repaid to the employee.

A.2) Young Workers

Hittech Group rejects child labor, also with regards to its business partners. Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is highest. An appropriate mechanism to verify the age of workers is in place in all Hittech Group subsidiaries. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Employees shall not perform work that is likely to jeopardize their health or safety. Employees under 18 shall not perform night shifts and

overtime. Where applicable, Hittech Group ensures proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Hittech Group provides appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices will be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided.

A.3) Working Hours

Studies of business practices clearly link employee strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Employees shall be allowed at least one day off every seven days.

A.4) Wages and Benefits

Compensation paid to our employees has to be compliant with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, employees will be compensated for overtime. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers are provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

A.5) Humane Treatment

Within Hittech Group we do not tolerate harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to workers.

A.6) Non-Discrimination/Non-Harassment

Hittech Group is committed to be a workplace free of harassment and unlawful discrimination, and shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Employees will be provided with reasonable accommodation for religious practices where and when applicable. In addition, employees or potential employees should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

A.7) Freedom of Association

In conformance with local law, Hittech Group respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with

management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

B. Health and Safety

Hittech Group recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. The group also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards implemented are:

B.1) Occupational Safety

Employee potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, employees are provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps will be taken to remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments. Reasonable accommodations are to be provided for nursing mothers.

B.2) Emergency Preparedness

Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, employee training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

B.3) Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of employees to work.

B.4) Industrial Hygiene

Employee exposure to chemical, biological, and physical agents is identified, evaluated, and controlled according to the Hierarchy of Controls. Whenever potential hazards are identified, Hittech Group shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, employees are provided with and obliged to use appropriate,

well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

B.5) Physically Demanding Work

Employee exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks are to be identified, evaluated, and controlled.

B.6) Machine Safeguarding

Production and other machinery is evaluated for safety hazards on a regular basis. Physical guards, interlocks, and barriers are provided and properly maintained where machinery presents an injury hazard to workers.

B.7) Sanitation, Food, and Housing

Employees are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Employee dormitories provided by Hittech Group or a labor agent are maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heating and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

B.8) Health and Safety Communication

Hittech Group provides employees with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that employees are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information is clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all employees prior to the beginning of work and regularly thereafter. Employees are encouraged to raise any health and safety concerns without retaliation.

C. Environment

Hittech Group recognizes that environmental responsibility is integral to producing world-class products. The Group will identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public.

The environmental standards recognized are:

C.1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals, and registrations of the Group's subsidiaries will be obtained, maintained, and kept current and their operational and reporting requirements will be followed.

C.2) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are minimized or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance and facility processes, or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, will be conserved by practices such as

modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

C.3) Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment are identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

C.4) Solid Waste

Hittech Group has implemented a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

C.5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Hittech Group conducts routine monitoring of the performance of its air emission control systems.

C.6) Materials Restrictions

Hittech Group adheres to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

C.7) Water Management

Hittech Group where applicable has implemented a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Hittech Group conducts routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

C.8) Energy Consumption and Greenhouse Gas Emissions

All Hittech Group subsidiaries have established a greenhouse gas reduction goal. Energy consumption and all relevant scopes 1 and 2 greenhouse gas emissions are tracked, documented, and reported against the greenhouse gas reduction goal. Hittech Group and its subsidiaries continuously look for methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

D. Ethics

To meet social responsibilities and to achieve success in the marketplace, Hittech Group and its subsidiaries uphold the highest standards of ethics, including:

D.1) Business Integrity

It is our policy to conduct all of our business in an honest and ethical manner. The highest standards of integrity are to be upheld here. We take a zero-tolerance approach to bribery, corruption, extortion and embezzlement. We are committed to acting professionally, fairly and with integrity in

all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery, corruption, extortion and embezzlement. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We take our legal responsibilities very seriously.

D.1.a) Bribery

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

D.1.b) Gifts and hospitality

Employees must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies;
- or to any public employee or government officials or representatives, politicians or political parties;
- or which exceeds Euro 50,-/MYR 50,- in value for each individual gift or Euro 100,-/MYR 100,- in value for each hospitality event (not to exceed a total value of Euro 250,-/MYR 250,- in any financial year), unless approved in writing by the employee's manager.

Employees may not accept any gift or hospitality from our business partners if:

- it exceeds Euro 50,-/MYR 50,- in value for each individual gift or Euro 100,-/MYR 100,- in value for each hospitality event (not to exceed a total of Euro 250,-/MYR 250,- in any financial year), unless approved in writing by the employee's manager;
- or it is in cash;
- or there is any suggestion that a return favor will be expected or implied.

Where a manager's approval is required above, if the manager is below Managing Director level then approval must be sought from the appropriate Managing Director.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

D.1.d) Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Our strict policy is that facilitation payments must not be paid.

D.1.e) Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

D.1.f) Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to

ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the appropriate Managing Director. All charitable contributions should be publicly disclosed.

D.1.g) Record keeping

All subsidiaries of the Group must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. Every employee must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

D.2) Disclosure of Information

All Hittech Group business dealings will be transparently performed and accurately reflected on the Group's business books and records. Information regarding the Group's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance will be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

D.3) Intellectual Property

Hittech Group respects intellectual property rights. When applicable, transfer of technology and know-how is done in a manner that protects intellectual property rights, and customer and supplier information always has to be safeguarded.

D.4) Fair Business and Competition, Anti-Cartel

It is the policy of Hittech Group to promote fair competition. Hittech Group abides by all applicable domestic and foreign anti-trust legislation as well as the law against unfair competition. It is not permitted to fix prices or terms of trade with competitors or to reach agreements with competitors to divide markets. Agreements contravening anti-trust laws may not be replaced with modes of behaviour that are agreed with competitors or by agreements within trade associations. The Hittech Group rejects practices that constitute unfair competition. If Hittech Group subsidiaries have a dominant market share, this may not be abused at the expense of customers or competitors. All members of the management board, managers and employees must be aware of the fact that infringing competition and/or anti-cartel laws does not, in any way, serve the interests of the Hittech Group and must be totally avoided.

The valid legal provisions for international commercial activities also apply to the Hittech Group's products and services. The Hittech Group's subsidiaries must conform to all valid export or import restrictions and must comply with permit regulations and conditions imposed by the national or international authorities.

D.5) Responsible Sourcing of Minerals

Hittech Group has adopted a policy and exercises due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and

Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

D.6) Privacy

Hittech Group is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Hittech Group is compliant with with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

D.7) Employee responsibilities

Every Hittech Group employee must ensure that he/she reads, understands and complies with this code of conduct. The prevention, detection and reporting of any activity that might lead to, or suggest, a breach of this policy are the responsibility of all those working for the Group or under the Group's control. All employees are required to avoid any such activity.

Every employee is encouraged to raise concerns about any issue or suspicion of malpractice that is in conflict with or a breach of this policy at the earliest possible stage. These concerns should be raised with his/her line manager or managing director.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Group reserves the right to terminate its contractual relationship with any employee if he/she breaches this policy.

D.8) Protection of Identity and Non-Retaliation

Hittech Group ensures the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential breach of this policy has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Hittech Group CFO immediately via conduct@hittech.com.

E. Management systems

All Hittech Group subsidiaries are responsible for having a management system in place with a scope that is related to the content of this code of conduct. The management system has to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the operations and products of the applicable subsidiary; (b) conformance with this code; and (c) identification and mitigation of operational risks related to this code. It should also facilitate continual improvement. The management system will be audited by the Hittech Group board of directors at least every two years.

The management system should contain the following elements:

E.1) Company Commitment

Corporate social and environmental responsibility policy statements affirming subsidiary's commitment to compliance and continual improvement, endorsed by executive management.

E.2) Management Accountability and Responsibility

The Hittech Group subsidiary clearly identifies senior executive and company representative(-s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

E.3) Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this code.

E.4) Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with subsidiary's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

E.5) Improvement Objectives

Written performance objectives, targets and implementation plans to improve the subsidiary's social, environmental, and health and safety performance, including a periodic assessment of subsidiary's performance in achieving those objectives.

E.6) Training

Programs for training managers and employees to implement subsidiary's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

E.7) Communication

A process for communicating clear and accurate information about Hittech Group subsidiary's policies, practices, expectations, and performance to employees, suppliers, and customers.

E.8) Employee Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this code and to foster continuous improvement. Employees must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

E.9) Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the code, and customer contractual requirements related to social and environmental responsibility.

E.10) Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

E.11) Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

E.12) Supplier Responsibility

A process to communicate code requirements to suppliers and to monitor supplier compliance to the code.



REFERENCES

The following standards were used in preparing this Code and may be useful sources of additional information.

Dodd-Frank Wall Street Reform and Consumer Protection Act
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Eco Management & Audit System http://ec.europa.eu/environment/emas/index_en.htm Ethical Trading Initiative www.ethicaltrade.org/

ILO Code of Practice in Safety and Health
www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labor Standards
www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ISO 14001 www.iso.org

National Fire Protection Association www.nfpa.org

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>

OECD Guidelines for Multinational Enterprises <http://www.oecd.org/investment/mne/1903291.pdf>

Universal Declaration of Human Rights <https://www.un.org/en/universal-declaration-human-rights/>

United Nations Convention Against Corruption <https://www.unodc.org/unodc/en/treaties/CAC/>

United Nations Convention on the Rights of the Child
<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

United Nations Convention on the Elimination of All Forms of Discrimination Against Women
<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>

United Nations Global Compact www.unglobalcompact.org

United States Federal Acquisition Regulation www.acquisition.gov/far/

SA 8000 <https://sa-intl.org/programs/sa8000/>

Social Accountability International (SAI) www.sa-intl.org