



Neways Electronics International N.V.

# CODE OF CONDUCT

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## Foreword by Board of Directors

Dear reader,

We encourage and pursue an open and honest culture, we play a fair game and we take our social corporate responsibility as an organization. Our Code of Conduct guides us to achieve and uphold this. It describes our standards regarding daily business operations and supports us in conducting our business in an ethical way. Neways conducts business on the basis of fairness, good faith and integrity and expects the same from its employees and stakeholders.

This Code of Conduct is an expression of our Neways DNA. Herewith we encourage ourselves and all employees to live and respect this Code of Conduct to use this document as guidelines for making sound, fair and ethical decisions.



Paul de Koning  
CFO

Huub van der Vrande  
CEO

Adrie van Bragt  
COO

## Definitions used

The definitions in the Code of Conduct have the following meaning:

- Code of Conduct: This document including its appendices
- Employees: All directors, officers and employees (regardless whether (temporary) employed, hired, seconded, trainees, etc.) and other representatives of Neways worldwide.
- Neways: Neways Electronics International N.V. including all its affiliates.
- Stakeholders: Third parties with whom Neways does business or has interest in the business of Neways e.g. suppliers, clients, consultants, other business partners, etc. including the foregoing party's its employees.

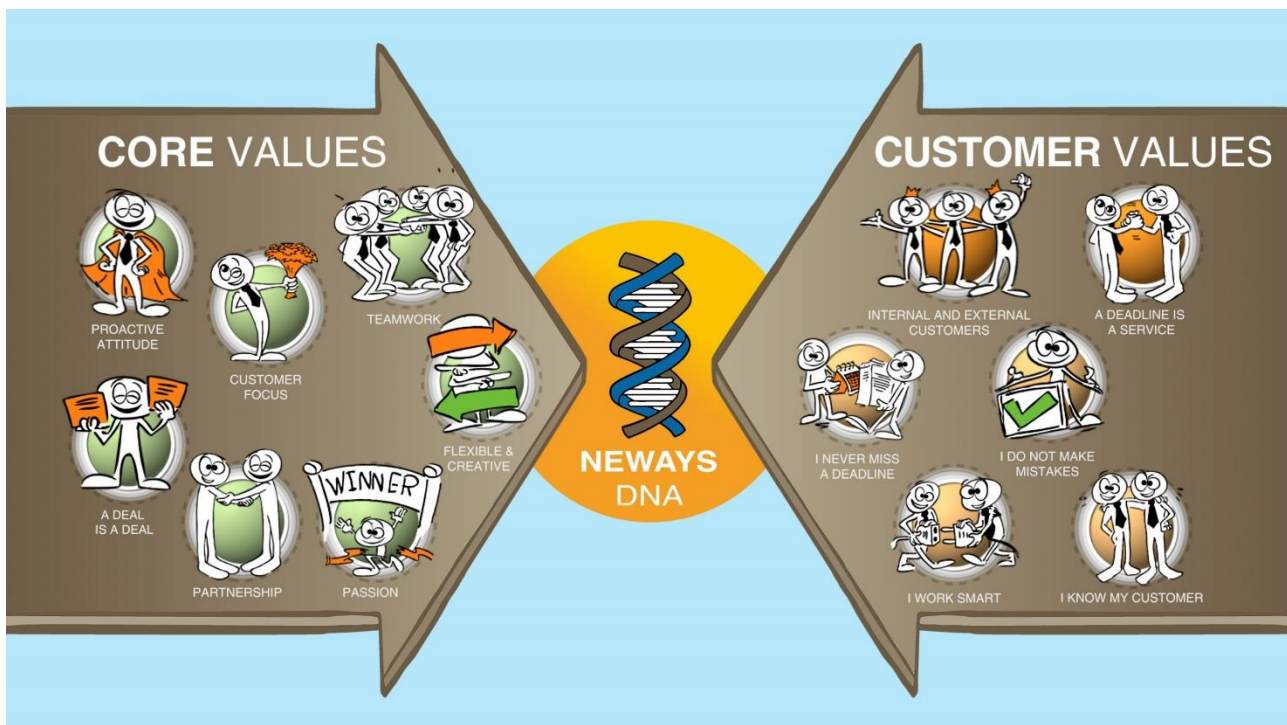
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## Why this Code of Conduct?

At Neways, we pursue to perform our actions in an ethically and socially responsible manner. It is for that reason that we have developed a Code of Conduct document and ancillary program in which we have defined guidelines for our business conduct. We apply these guidelines to ourselves and we seek to comply with them in all our business relationships and in all other situations in which we bear a responsibility.

This Code of Conduct is a result of, and an addition to, our Neways DNA values, which guide our behavior as Neways employees company-wide.



With this Code of Conduct we want to promote and ensure fair and ethical behavior. The Code of Conduct helps us to drive ethical, social and balanced behavior, to control our business exposure and safeguard the company's reputation. The Code of Conduct addresses the following topics:

- Respecting human rights and ensuring safe and healthy work environment
- Valuing ethics & integrity in our business relations with others
- Protecting company assets and working with IT
- Managing our environmental impact
- What we do for the community
- Who to speak to in case of questions or concerns

Although these topics are not all inclusive, they provide guidance for the most important aspects of ethical, social and fair conduct within our business operations. There are maybe other, local

guidelines that supplement this Code of Conduct. Next to this Code, you are always expected to work and act in compliance with prevailing law, legislation and regulations.

## To whom does this Code of Conduct apply?

This Code of Conduct applies to the business behavior and acting of all Neways employees and stakeholders. This Code is in line with the Code of Conduct of the Responsible Business Alliance (formerly EICC) and the 10 principles of the United Nations Global Compact.

Employees commit to comply with this Code of Conduct in their (employment) contract and are expected to report any potential conflict of interest or any other possible exception to or violation of the Code of Conduct. We expect stakeholders to respect and act in accordance with the Code of Conduct.

As an employee, this Code of Conduct should be the basis for your daily working practice. Please take the time to familiarize yourself with it; this in order to integrate the guidelines in your daily activities.

If you have further questions what the Code means in specific situations, please ask your direct manager or refer to the chapter “Who to speak to in case of questions or concerns” or contact your local HR manager. When in doubt, Ask!

## Respecting human rights and ensuring a safe and healthy workplace

Neways is committed to ensure the human rights of its employees and to treat them with dignity and respect. This applies to all employees, including temporary workers and trainees, etc.. Moreover, we do not do business with any organization or company which is known to us to violate fundamental human rights.

Next to this, our goal is to provide a good, healthy and safe work environment. We strive for no safety accidents or incidents to happen and we want to create an environment where employees feel at home, respected and where they can develop themselves to the fullest extent.

For more information, please see Appendix A – Human rights policy and Appendix B – Health & Safety policy.

### Conflict minerals

With regards to our supply chain, Neways acting as electronics manufacturing services Company strives insofar in its control to follow the directives and regulations regarding conflict minerals. As described under the Dodd-Frank initiative, tantalum, tin, tungsten and gold (also known under 3TG) are defined as suspected minerals that can originate from the conflict area of the Democratic Republic of Congo (DRC) and adjoining countries.

Neways expects and requires from its relevant Stakeholders, i.e. suppliers, to ensure information and support regarding conflict minerals-free compliance in their supply chain and thus deliveries to Neways. We also encourage and support our clients to follow the conflict mineral-free initiatives within the industry.

For more information, please see Appendix C – Conflict Minerals policy.

## Valuing ethics & integrity in our business relations with others

We strive to be our clients' tactical and strategic partner. In our business interactions we strive for relationships based on good faith and mutual trust and Neways does not accept any form of corruption or bribery. In addition, we do not seek to influence stakeholders with or allow ourselves to be influenced by third parties, in such a way that creates an unfair advantage for any of the involved parties. Unfair practices, such as corruption, bribery, insider trading and accepting or giving unjustifiable gifts are not tolerated within Neways. You should act without conflicts of interest and we employ fair competition principles. Not following the guidelines can lead to disciplinary measures.

### Anti-corruption & anti-bribery

We expect our employees to uphold high standards with regard to integrity in all business interactions. Neways does not tolerate any form of bribery, corruption, extortion and embezzlement and all employees and stakeholders must follow the same rules. We act fairly, professionally, and with integrity. For further guidance, please see Appendix D – Anti-Corruption & Anti-Bribery.

### Conflict of interest

You have a conflict of interest when your personal, private activities or activities in other enterprise or company could influence your decisions for Neways.

It is expected from Neways employees to avoid conflicts of interest and act in the best interest of Neways. A conflict of interest can influence your decision-making in business for Neways and jeopardize the employee's or Neways' reputation.

Employees are obliged to inform Neways upfront in writing when engaging in activities in other enterprises or if a conflict of interest could arise. Per individual case Neways shall investigate and will react in a reasonable and proportional manner.

### Fair competition

Neways expects from its employees to handle within applicable laws and regulations and to make their decisions in an objective and fair way. Neways employees will not favor any party based on personal preference and handle in a transparent way so choices can be justified to all stakeholders involved.

The principles of how to deal with conflicts of interest and fair competition can be found in Appendix E – Conflicts of Interest & Fair Competition.

### Insider dealing

In relation to Neways, inside information refers to undisclosed information, not known to the general public, which could affect the trading price of Neways shares or other Neways securities. As an employee you may from time to time have access to information relating to Neways' business that can be defined as inside information. During the time that you are in the possession of such information, you may not trade (directly or indirectly) Neways Electronics International N.V. shares or other Neways related securities in any way. In addition, ensure that you do not disclose information to others outside of Neways that may be stock-sensitive, or advise others to trade on



Neways shares or other securities when you hold inside information. All employees who may have access to Inside information about Neways are subject to all applicable insider trading laws, most notably the EU Market Abuse Regulation. Neways has a policy in place to identify inside information and regulate its disclosure.

For further guidance, please see Appendix F – Insider Dealing Policy.

### Gifts, Hospitality and Entertainment

Neways accepts that the proportional exchange of gifts and hospitality may foster business relations but must always be limited to what is socially acceptable. However, Neways employees may never take gifts or accept invitations that will influence their business decisions or put themselves or Neways in obligation, or will try to accomplish the same with third parties. Any gift offered or accepted by a Neways employee shall never take the form of money. Any gift exceeding the perceived value of €150 must be authorized by your direct manager.

For further guidance please see Appendix G – Gifts, Hospitality and Entertainment.

### Financial reporting

As an employee you have the responsibility to record all business transactions accurately, completely and in a timely manner. Neways' financial reports of revenues or expenses may not be overstated or understated; you may never make false or artificial entries in any company record, or alter any documents used to support Neways financial reports. Reporting false information is strictly prohibited.

For further guidance, please see Appendix H – Financial Reporting Policy.

### The exchange of public information

Neways employees may from time to time participate in information exchange that is public of nature, for example by communicating to the media or via social media. Your public behavior can have significant impact on Neways. Therefore, you as employee are not allowed to represent Neways' corporate opinion unless you have been specifically asked to do so. Employees must indicate that the views they express are their own and not those of Neways and in all cases should not be detrimental to Neways.

Giving any third party information about Neways' (financial) results and performance is privileged to the Board of Directors and this information may not be disclosed by other employees. You should always be given explicit prior approval by the Board of Directors before communicating to the media or representing yourself on any public (social) medium as a member of Neways or on behalf of Neways.

## Protecting company assets and working with IT

### Protecting company assets and intellectual property

Our existence is based on people and knowledge. Therefore we find it of great importance that Neways assets and resources are protected against illegal, unauthorized or irresponsible use. These include physical assets such as buildings, equipment, machinery as well as intellectual property, trade secrets, personal data and confidential information. Neways assets should never be used for purposes that violate the law or company policies.

We treat and handle third-party assets which are within our possession and confidential information disclosed to us by a third party with the same level of care we apply to our own assets and information.

Existing knowledge and information within Neways is key in achieving competitive advantages in our markets. Therefore, we safeguard our patents, trademarks, copyrights, trade secrets and other forms of intellectual property against unauthorized use or improper disclosure. We shall not use property, information and data or services for personal benefit or personal benefit of anyone else. It should only be used for the benefit of the Neways organization. Also if disclosed to us we shall adequately protect the interests of third parties e.g. client's in foregoing mentioned rights and assets.

### Privacy and data protection

We highly respect the privacy of our customers, suppliers, employees and other relevant individuals and we protect their personally identifiable information from abuse. We process the personal data of individuals only where there is a legitimate business purpose, strictly to the extent needed and in compliance with relevant laws and regulations e.g. General Data Protection Regulation (GDPR). Neways strives for personal data protection, related monitoring and optimization by following the Neways Personal Data Protection Policy.

Further details can be found in Appendix I – Personal Data Protection Policy Neways including a Neways Data Leak Protocol.

### Confidential information

Unauthorized disclosure of confidential information of Neways, or its stakeholders may unwillingly benefit competitors or may adversely affect cooperation with customers and suppliers. Therefore it is critical to guarantee and ensure the confidentiality of information of Neways and its stakeholders. At the same time Neways operations are highly dependent on reliable information processing and sharing with stakeholders e.g. suppliers and client's. Neways shall take appropriate measures to safeguard the interest of third parties who disclosed confidential information to Neways. For example by limiting the discloser only if strictly needed for normal business activities and entering into Non-Disclosure Agreements. It is important to report without undue delay to your direct manager any (possible) confidential information leakage.

## IT usage

IT usage is the key in our operational activities and therefore Neways uses formal guidelines in the use of IT assets. The following Neways policies are defined with regard to IT usage:

We commit ourselves to the general Neways account and account security policy. This policy establishes the classification of network accounts, the account protection by passwords and the standards for using accounts and passwords.

We commit ourselves to the general Neways policy regarding use of IT hardware (PC's, laptops). Aforementioned policy describes the proper and acceptable use of Neways IT hardware and the corresponding user profiles which are available to Neways employees. Those user profiles determine the user permission set regarding the number of applications available and the degree of application extensibility by Neways employees. For further guidance, see Appendix J – User Profiles and Account Security.

Further we commit ourselves to the general Neways policy with respect to the proper use of mobile phone usage (during working hours). We commit ourselves to the general Neways policy describing the proper use of internet, e-mail, social media and software with the use of Neways IT assets. The policy can be found in Appendix K – Use of Media.

## Managing our environmental impact

Neways is committed to ensure an environmentally friendly workplace, for our employees and the community. We realize that resources of whatever kind are not inexhaustible and therefore deserve to be utilized with due care. We strive to limit our environmental impact and footprint and we follow the guidelines issued by the Responsible Business Alliance (RBA – formerly EICC).

Further we recognize that environmental responsibility is essential for providing electronics manufacturing services in a sustainable manner. We demonstrate this responsibility through the environmental management systems we have in place, in order to continuously develop and improve our environmental impact and footprint. We, acting as electronics manufacturing company and insofar in our control, aim to comply with, using reasonable efforts, relevant law, legislation and regulations such as Conflict Minerals, RoHS and REACH. We aim to involve relevant stakeholders e.g. clients and suppliers in our environmental endeavors and actively notify them of their obligations. For more information, see Appendix L – Environmental Responsibility.

## What we do for the community

At Neways, we want to contribute to the knowledge of technology and innovation in our society, with the aim to contribute to Science, Technology, Engineering and Mathematics (“STEM”) education of the new generation. In this way we express our social responsibility to the communities where we are located; for our society to become up to the next level.

Our approach is to apply our skills and resources strategically to projects, programs and initiatives that have a positive impact on community development for the short- and long-term.

We aim for innovative and strategic partnerships with educational institutions like local universities and schools as well as with nonprofit organizations, local governments and local communities that research new technologies and strategies related to our business or which create new talents for the future.

The partnership and/or contribution of Neways can be done via material (e.g. donations, sponsoring) or immaterial support (e.g. sponsoring, volunteering). Foregoing must of course be in line with this Code of Conduct.

Neways doesn't support political organizations, parties and single politicians, sectarian or religious organizations as well as persons or organizations which are detrimental to the reputation of Neways. For more information, see Appendix M – Community initiatives.

## Who to speak to in case of questions or concerns

Neways encourages honest, ethical and fair behavior. We aim to create a culture in which all employees and insofar possible stakeholders act in an ethical manner, try to set the example in this regard and in which we can openly and freely discuss questions and/or remarks on ethics and integrity.

If you notice something that you believe is in conflict with this Code of Conduct, we encourage you to first talk to your direct manager about it. If that is not appropriate or if it does not resolve the issue, you can talk to your local HR manager or if not possible or appropriate the HR manager of a Neways sister Operating Company. Does this still not resolve the issue, please contact the Corporate Head of HR – who is appointed as compliance officer for this Code of Conduct – or report as last resort your concerns via the Neways Whistle Blower Policy, included as Appendix N – Whistle Blower.

Neways promises that it will investigate the case, and take appropriate action based on the situation. Depending on the severity of the situation this can result in disciplinary measures.

## Practicalities

### Release and changes of the Code of Conduct

The content of the Code of Conduct is developed in cooperation with specialists within and outside our organization. This document and the accompanying appendices are officially published documents. This set of documents is centrally managed by the Compliance Officer.

If you have questions about the content of the Code of Conduct or if you want to suggest changes, please contact the Compliance Officer, who will coordinate all changes that are made to the Code of Conduct or its appendices. All changes to the Code of Conduct main document or appendices must be officially approved and released by the Board of Directors and the Compliance officer.

### Compliance Officer

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