

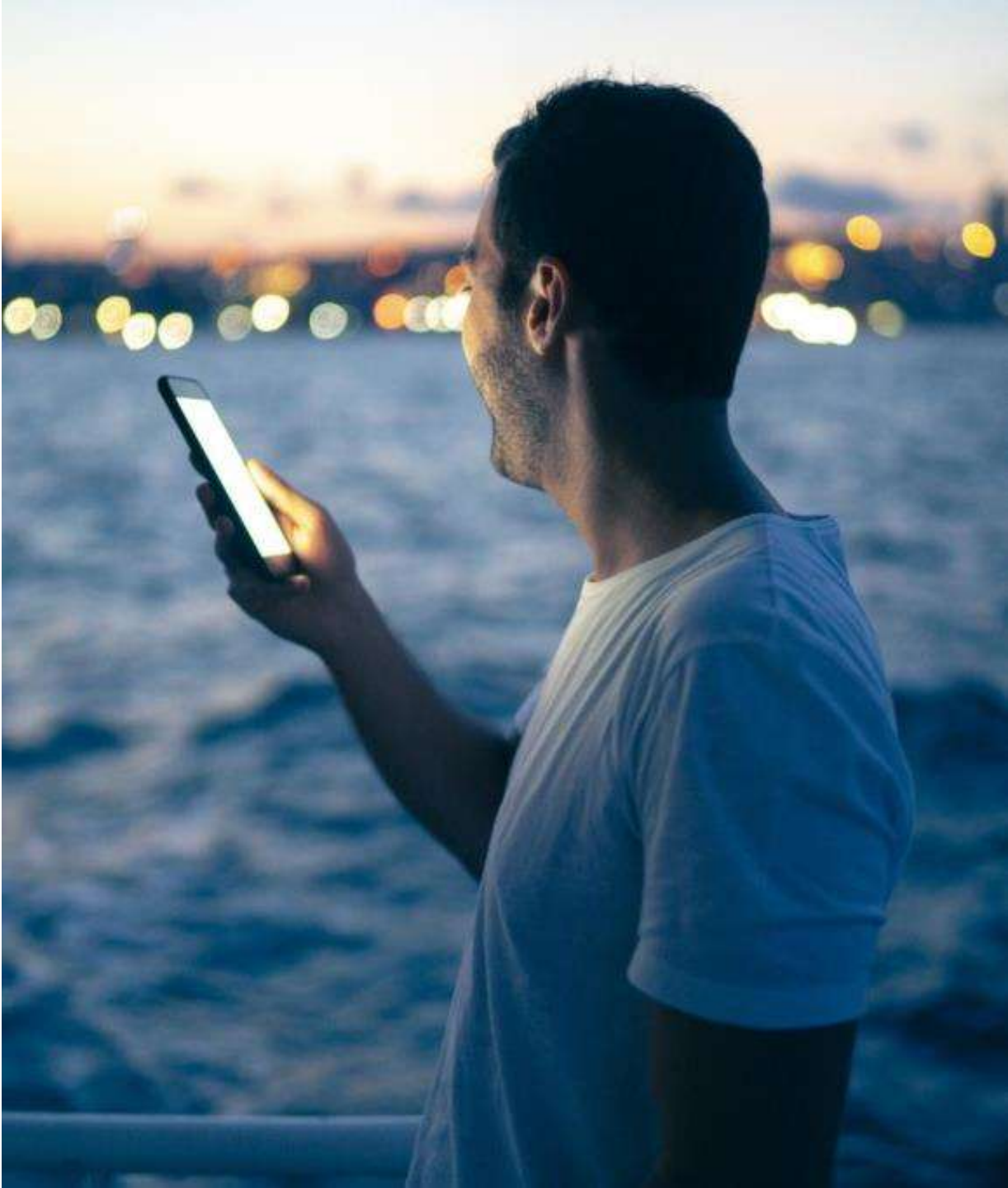
SCANFIL

# Code of Conduct



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# Introduction

Scanfil Code of Conduct has been adopted to underscore the principles by which Scanfil conducts its relations with employees, business partners and other stakeholders.

All our employees must be aware of and comply with this Code of Conduct. Together with our Group policies, this document forms the basis for the way we work in Scanfil. All our employees are expected to always act according to Scanfill Code of Conduct.

All managers are accountable for communicating the content of and for enforcing the Code of Conduct within their organizations.

This document has been approved by the Group Management and can be amended or changed only by the Group Management.

Scanfil requires suppliers, subcontractors, consultants and other business partners to adopt and follow the principles as stated in this document.


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# Our Business Principles

Scanfil's objective is to strengthen the competitiveness of our customers and their products. We follow the laws and regulations in each country where we operate. The Code of Conduct sets forth the minimum level of approved behavior. In case local law is stricter than this document, local law shall prevail.

Our suppliers must uphold the human rights of workers, and treat them with dignity and respect as understood by the international community.

A photograph showing a close-up of two hands shaking in a firm grip, symbolizing a business agreement or partnership. The hands are wearing grey suit sleeves with white cuffs. The background is a blurred office environment with several people in business attire standing and talking.

We follow the laws and regulations in each country where we operate.

# Ethics, Compliance with Law and Culture

Scanfil is always committed to the highest standards of ethical conduct and compliance with applicable laws, regulations and other legal requirement where we as a company are conducting business. We respect different cultures, cultural heritage and local legally accepted ways of action.

All employees are liable to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees must practice honesty and integrity in every aspect of dealing with other Scanfil employees, the public, the business community, stockholders, customers, suppliers and government authorities.



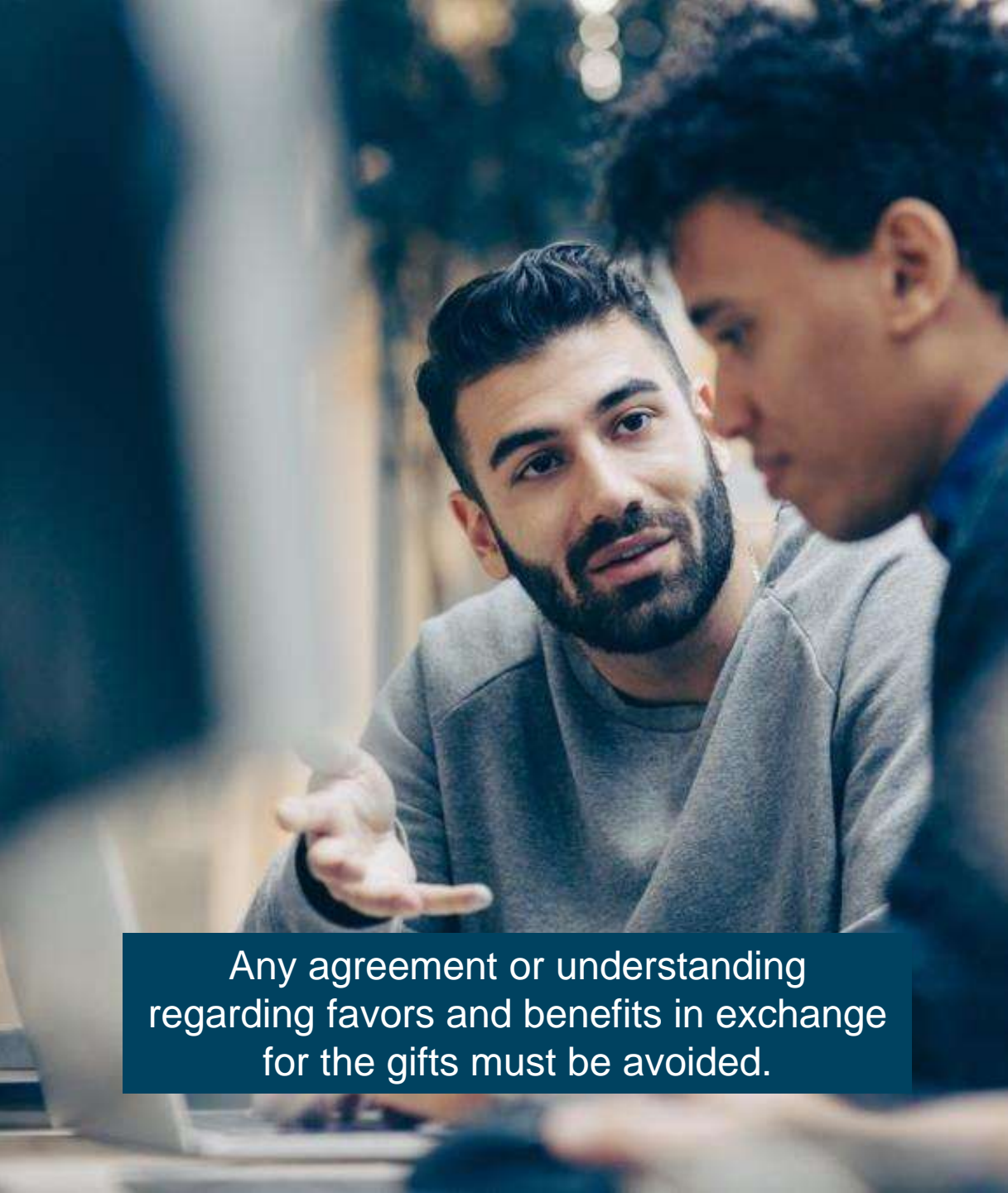
We respect different cultures,  
cultural heritage and local legally  
accepted ways of action.

# Fairness in All Business Relations 1(2)

Business decisions are based on the best interests of Scanfil, without regard to personal relationships or considerations.

Employees at Scanfil are required to be sensitive and to avoid any situations involving a conflict or the potential for a conflict between their personal interests and the interest of Scanfil. This includes, but is not limited to acceptance and giving of personal gifts or hospitality to or from Scanfil stakeholders, other than gifts of nominal value or reasonable hospitality given in the ordinary course of business. Any agreement or understanding regarding favors and benefits in exchange for the gifts must be avoided. Likewise, Scanfil shall not offer rewards or benefits to any business party or stakeholder, which is, or appears to be, in violation of applicable laws.

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A photograph of two men in a professional setting. The man in the foreground has a beard and is wearing a grey sweater, looking towards the right. The man behind him is partially visible, also looking in the same direction. They appear to be in a meeting or discussion.

Any agreement or understanding regarding favors and benefits in exchange for the gifts must be avoided.

# Fairness in All Business Relations 2(2)


This policy does not prohibit expenditures of reasonable amounts for meals and entertainment of suppliers and customers which are an ordinary and customary business expense. Expenditures of this type should follow Scanfil Representation Policy.

Employees are expected to always act in a manner that will not be in conflict with the interest of Scanfil.

We act in a manner that is ethical and fair, without engaging in any inappropriate activities or unfair trade practices.

We will always be confronted with complex situations where we feel we do not get a clear answer from the Code of Conduct or through the Scanfil Management System. When this is the case, we expect employees to discuss the matter with his/her nearest superior or to seek advice from the contacts at the end of this document.

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A photograph of two men in a professional setting. The man in the foreground has a beard and is looking towards the right, gesturing with his hand. The man in the background is partially visible, looking at the first man. They appear to be in a meeting or discussion.

We act in a manner that is ethical and fair, without engaging in any inappropriate activities or unfair trade practices.

# Confidential Information

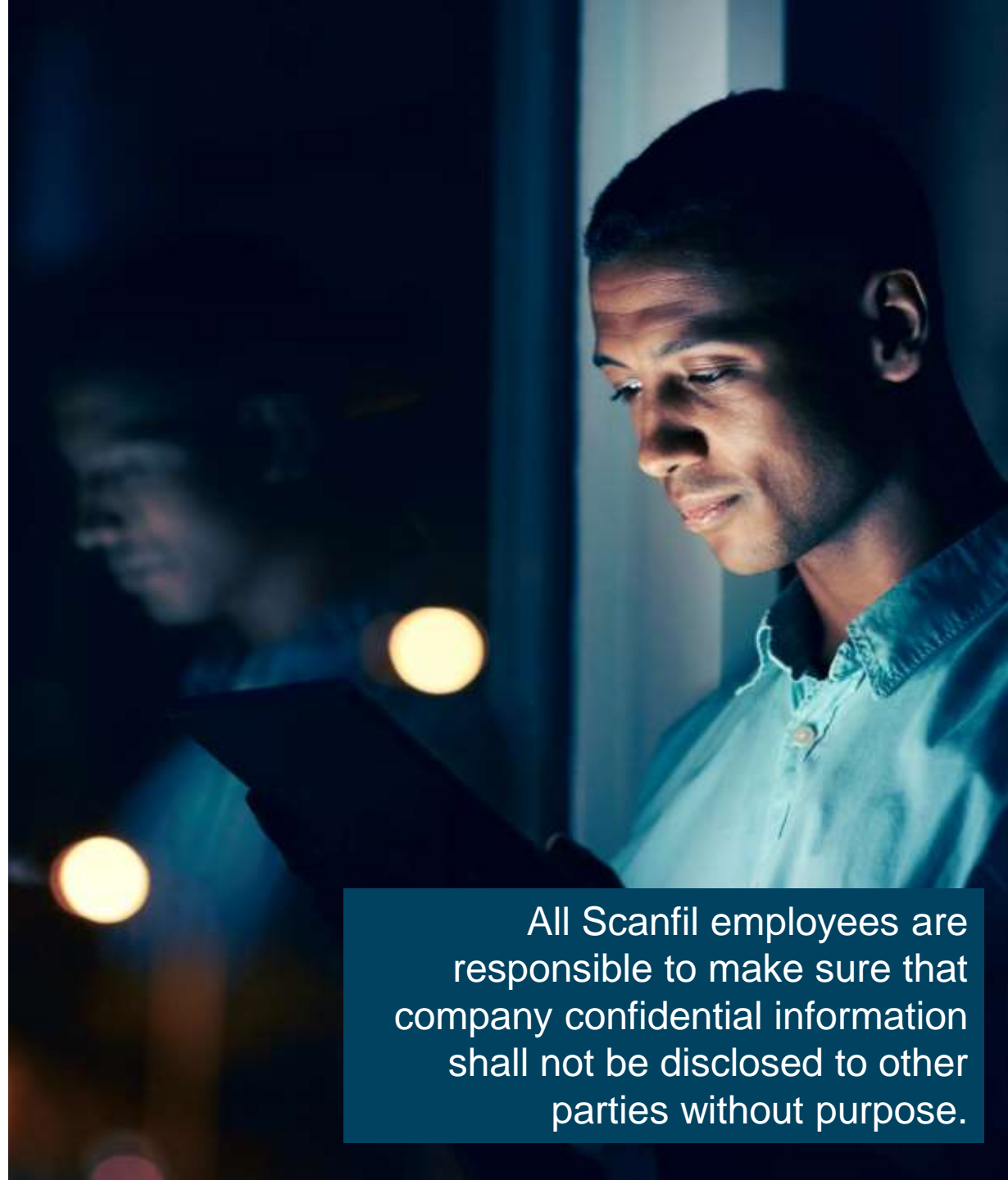
Employees often have access to information about Scanfil, and sometimes also to information owned by third parties, that is not generally available to the public. Such confidential information must not be passed on to anyone outside Scanfil including family members. All Scanfil employees are responsible to make sure that company confidential information shall not be disclosed to other parties without purpose. Also confidential information received from the customers or other business partners shall not be disclosed to third parties without the prior written permission.

We must all be aware of the risk of unintentional exposure of information, e.g. by discussing company matters with co-workers while traveling or in public places.

When it is necessary to disclose confidential information to carry out business purposes an NDA (Non Disclosure Agreement) will be always signed by the parties.

Employees are not allowed to exploit inside information when trading with Scanfil shares.

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# Communication

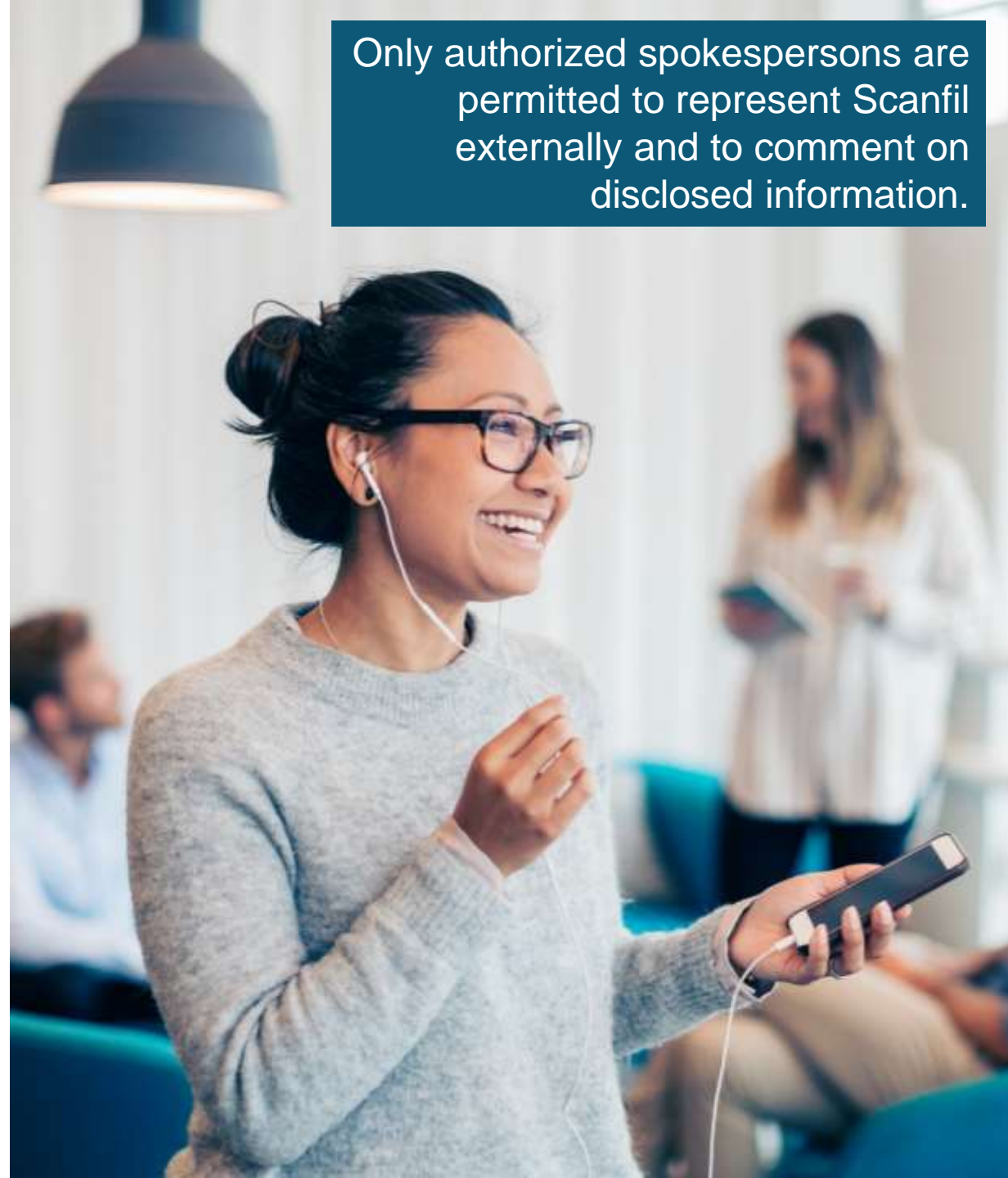
As a public listed company we as employees must comply with all applicable stock market laws and regulations in order to maintain the shareholders' trust and Scanfil's accountability on the financial market. Scanfil must therefore disclose information based on the Rules of NASDAQ Helsinki Ltd, the Securities Market Act and Finnish Corporate Governance Code as amended from time to time. The company has to disclose all relevant information, which may effect to the value of the security simultaneously to all market parties.

Only authorized spokespersons are permitted to represent Scanfil externally and to comment on disclosed information.

We do not allow misuse of inside information. Inside information is information that is not public and is likely to significantly affect the price of the Scanfil shares. Typical inside information is financial results and major orders.

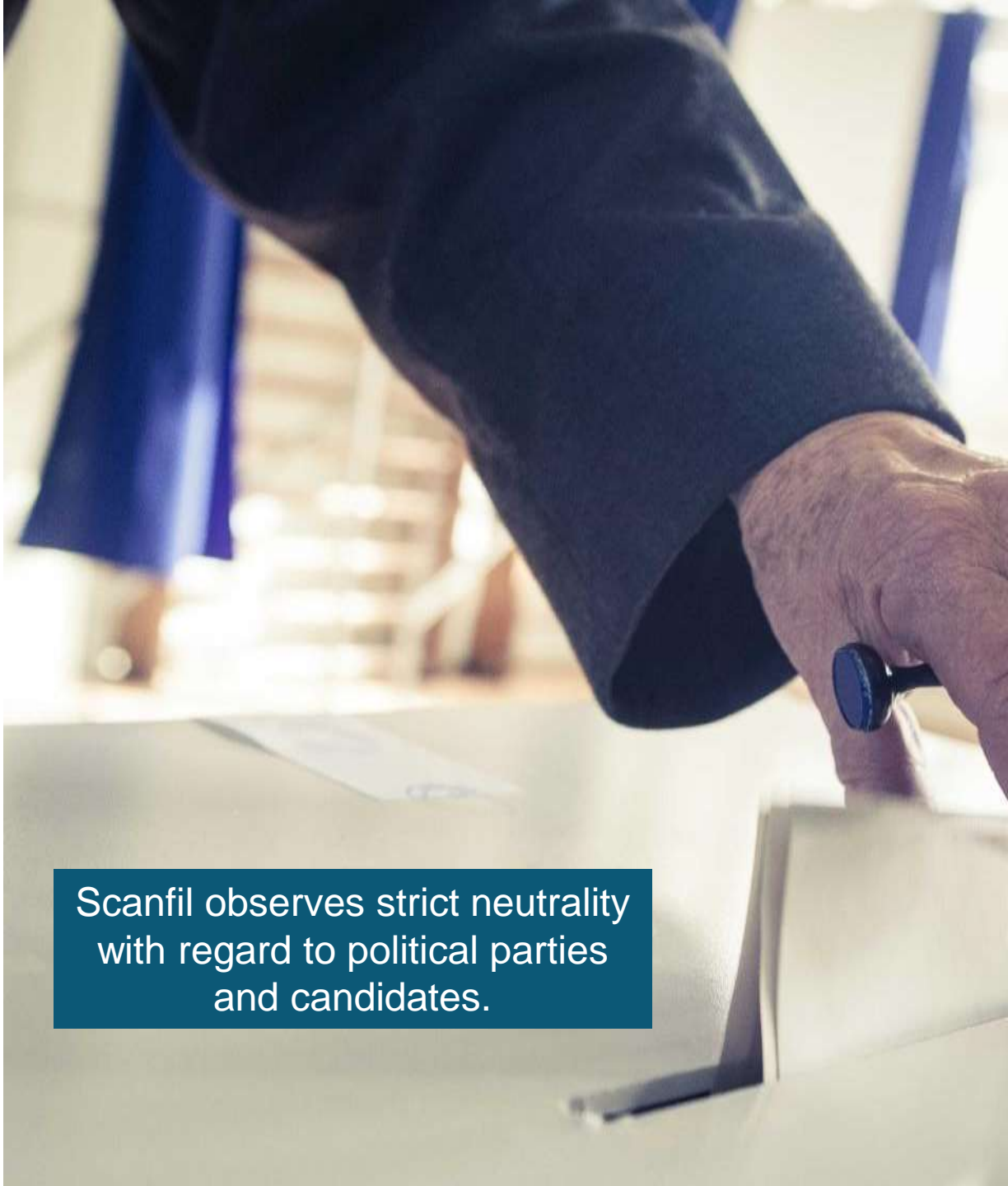
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# Political Involvement


Scanfil observes strict neutrality with regard to political parties and candidates. Neither the names nor resources of Scanfil shall be used to promote the interests of political parties or candidates.



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with regard to political parties  
and candidates.

# Conflict of Interest

We do not offer nor accept improper gifts or hospitality. Example of improper gifts or hospitality can be expensive trips paid by a customer or supplier. If there would be an unclarity whether an improper gift or hospitality is offered, closest manager, or if needed Global HR should always be advised. Employees may not engage themselves, with or without compensation, in activities outside Scanfil that might conflict or appear to conflict with Scanfil interests, without approval from the employee's manager and in accordance with the Grand Parent principle.



We do not offer nor accept improper gifts or hospitality.

# Social Media

We ask our employees not to act as Scanfil spokespersons, making statements regarding Scanfil or our customers on social media sites, unless specifically requested to do so. Neither should we use social media in a way that can cause harm to the Scanfil brand or reputation.

When we as individuals speak about ourselves in the social media sphere, we must not spread any Scanfil information that is not intended for the public.



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As employees we shall conduct our work with respect for all people regardless of any differences.

## Respect for the Individual

Scanfil will treat each and every employee in a fair and equal manner and will provide a safe and healthy working place for its employees. Neither Scanfil nor any person acting on behalf of Scanfil shall discriminate against any person with regard to employment based on the person's race, color, ethnic origin, age, religion, creed, gender, marital status, family status, sexual orientation, disability, or any other prohibited ground of discrimination protected by applicable law.

Physical, psychological, sexual or verbal harassment against any colleague or business partner will never be tolerated. As employees we shall conduct our work with respect for all people regardless of any differences.

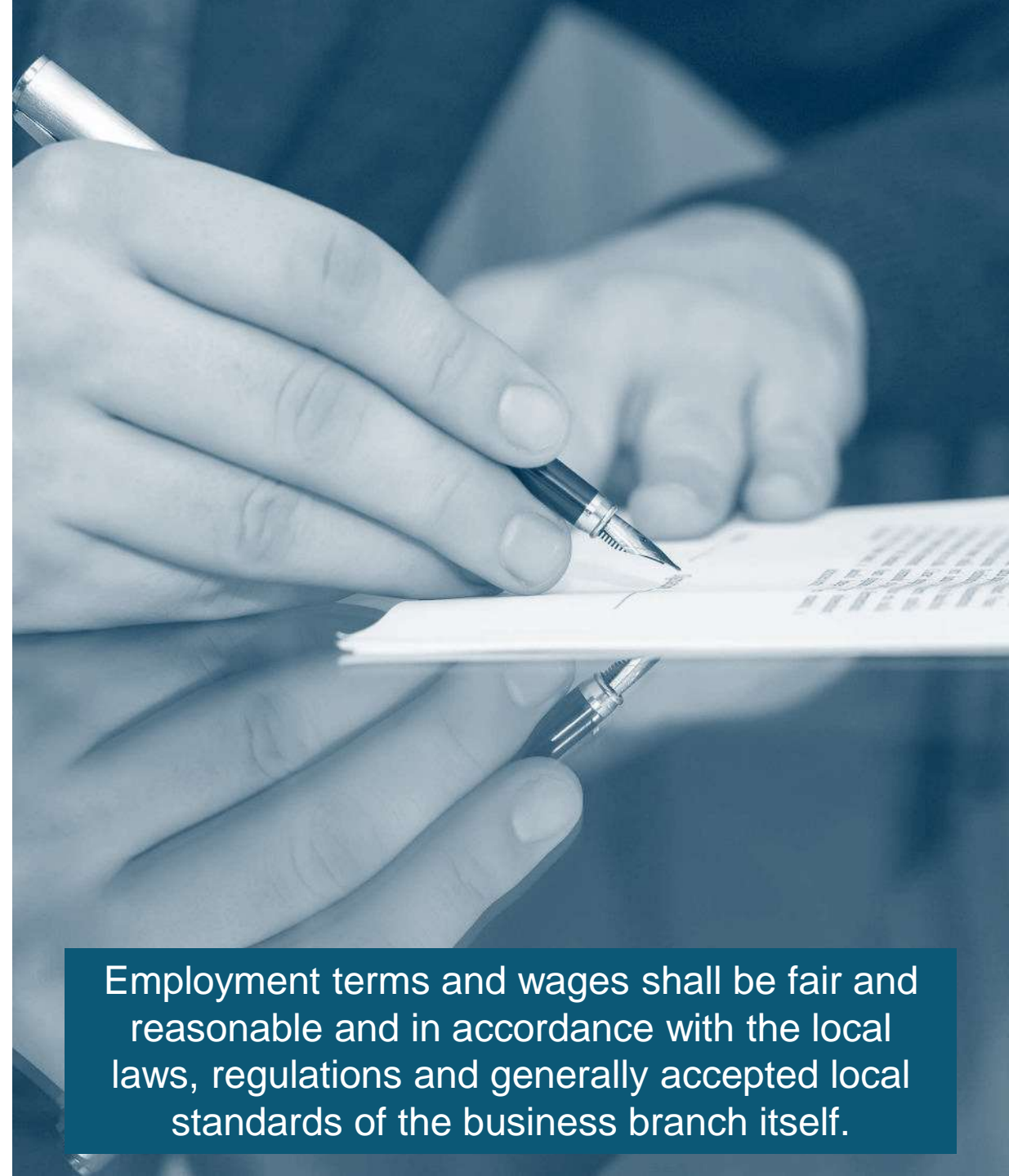
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# Fair Employment Conditions

Employment terms and wages shall be fair and reasonable and in accordance with the local laws, regulations and generally accepted local standards of the business branch itself.

All employees, including those who are temporarily employed, should have their employment terms in writing and be made aware of them as confirmed by signatures from both the employer and the employee.




Employment terms and wages shall be fair and reasonable and in accordance with the local laws, regulations and generally accepted local standards of the business branch itself.

# Freedom of Association

All employees are free to exercise the right to form, join or refrain from joining unions or similar organizations devoted to collective bargaining.

Representatives for trade unions must not be subjected to improper discrimination. Scanfil gives official trade union representatives access to trade union members and their work places.

A photograph showing a group of people in a meeting or conference, with several hands raised in the air, suggesting an active discussion or a vote. The image is slightly blurred, focusing on the hands in the foreground.

Representatives for trade unions must not be subjected to improper discrimination.

# Prevention of Involuntary or Child Labor and Human Trafficking

All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Scanfil does not tolerate underage labor in its operations or in the operations of any supplier or other party with whom we cooperate.

The minimum employment age is the lawful age for working in the country in question. We do not allow illegal or forced labor in our operations or in the operations of any parties with whom we cooperate.



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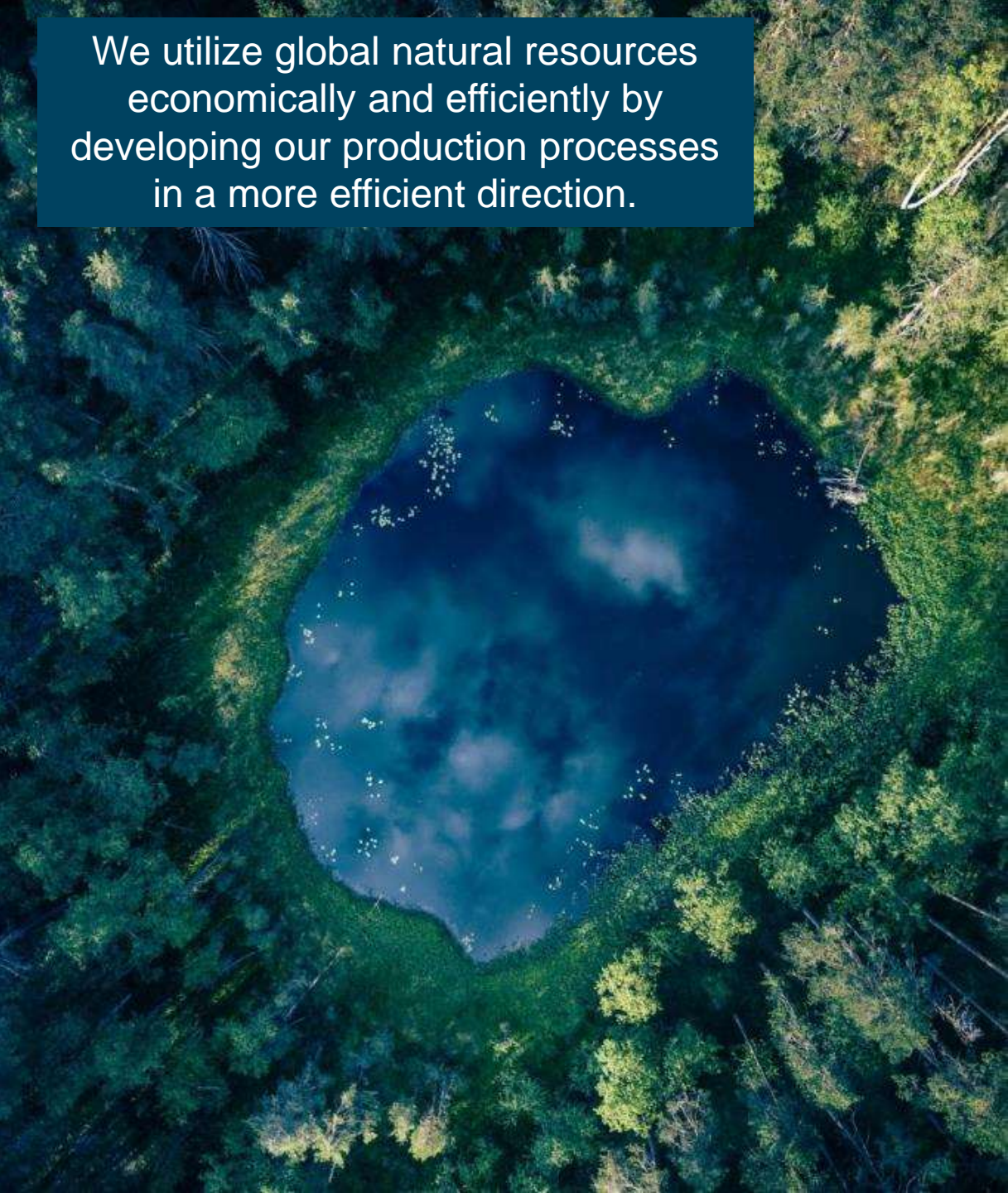


# The Environment 1(2)

Scanfil is working with continual improvements by taking into account the environmental aspects and requirements of customers, recognizing the effects of production on environment and by trying to minimize the environmental hazard.

Scanfil follow below principles related to environmental issues:

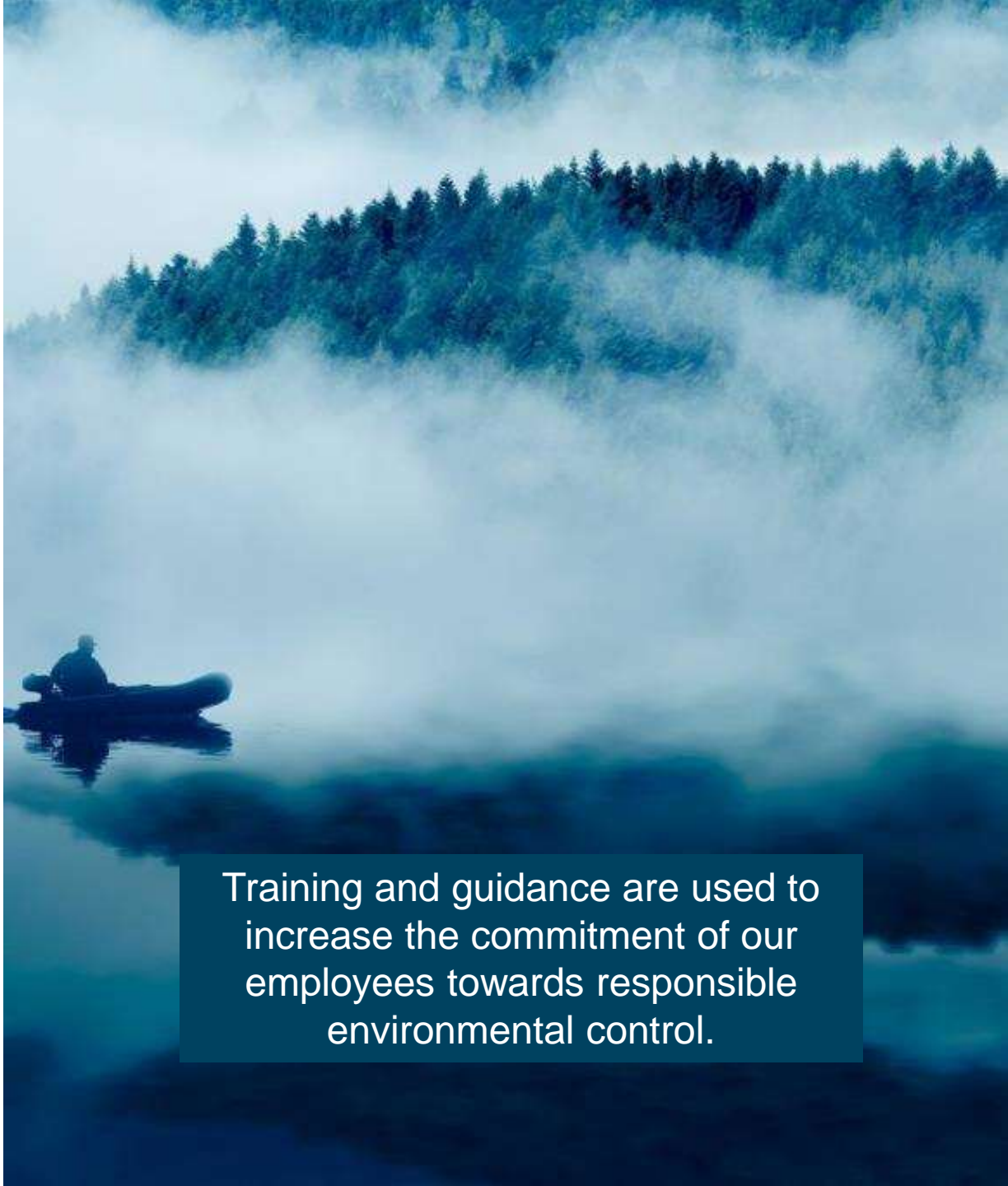
- We fulfill the requirements of the legislation and environmental authorities in all of our activities.
- We utilize global natural resources economically and efficiently by developing our production processes in a more efficient direction.
- We seek to diminish the effects of the industrial activities in terms of water, air and soil resources. Through the selection, use and development of technological and economical solutions in our production processes we aim to reduce environmentally harmful industrial emissions.

An aerial photograph of a lush green forest with a central pond. The water in the pond is a deep blue color, reflecting the sky. The surrounding trees are dense and vibrant green. The overall scene is a natural, serene landscape.

We utilize global natural resources economically and efficiently by developing our production processes in a more efficient direction.

# The Environment 2 (2)

- We strive for improvements when we recycle industrial waste. We try to reuse package materials and minimize the waste.
- We regularly inform the authorities of the environmental effects based on our activities.
- Training and guidance are used to increase the commitment of our employees towards responsible environmental control.
- We work systematically and our environmental programs feature continuous improvement, technical development and resource efficiency.

A person in a small boat is on a calm lake, surrounded by a dense forest of evergreen trees. The scene is shrouded in a thick mist or fog, creating a serene and somewhat ethereal atmosphere. The water reflects the surrounding landscape and the person in the boat.

Training and guidance are used to increase the commitment of our employees towards responsible environmental control.

# Health & Safety

We ensure the safety of all employees and any other persons who may be directly affected by the activities of Scanfil, as far as reasonably practicable. We will at all times provide and maintain a safe and healthy working environment for all our employees. We ensure that significant risks arising from work activities under our control are eliminated or adequately controlled via risk assessments.

The use of drugs or alcohol at the workplace is not tolerated.

We provide sufficient information, instruction, training and supervision to enable all employees to avoid hazards and contribute to their own health and safety at work.

Our employees are involved in health and safety decisions through consultation and co-operation. We comply with legal requirements, developing and implementing appropriate health and safety procedures and working practices.

**SCANFIL**



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# SCANFIL

Global contract manufacturer and systems supplier