

BLUECHIPS

ELECTRONIC PRODUCT DESIGN & MANUFACTURING SERVICES



CODE OF CONDUCT

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Foreword from the Zimpfer Family

At Bluechips Microhouse, we value long-term partnerships with our customers, suppliers and employees. It is important to us that the company can provide a safe and fulfilling workplace for our employees while in turn expecting high standards from our team.

As a German business in Thailand, we have been exposed to many different cultures throughout the twenty years of service we have provided to our customers and community. These experiences have helped us to formulate the code of conduct laid out below. It reflects our core values, fundamental beliefs and standards.

The code of conduct is considered binding to our managers and all employees while representing Bluechips in your duties. It should be considered a minimum standard of ethical, professional and legal conduct. It is our hope that our employees can embody these standards in both your professional and personal lives.

Furthermore, we have a fundamental belief that these values should form the basis of all our business relationships and thus expect that our suppliers and customers respect the values laid out within this document.

Sincerely,

The Zimpfer Family

Responsibilities

To ensure the code of conduct is lived, at Bluechips we believe compliance is a shared responsibility. Below we have outlined responsibilities based on different positions; employees, leaders, customers and suppliers. While we know we cannot control 3rd parties, we hope that our customers and suppliers do their best (where stated) to abide by the code of conduct laid out by Bluechips and that any misconduct that is observed is reported.



1. Basic Policies

1.1 Corporate Principles

We ensure customer satisfaction with our quality, flexibility, price performance ratio, innovation, competence and reliability.

We regard quality, environmental and occupational safety management as well as information security management as a management responsibility.

We continually look for ways to improve processes and minimize risks.

We encourage our employees to act responsibly and according to our corporate principles regarding safety, quality, health, environment, communication and business.

1.2 Ethical Principles and Core Values

At Bluechips, we believe in creating an environment of trust, honesty and partnership. We are committed to long-term partnerships with our employees, customers and suppliers as we believe PEOPLE are the most valuable capital.

We are guided by the following core values when conducting business (and within our personal lives):

- Quality
- Accountability
- Open Communication
- Service
- Environmental Awareness
- Integrity & Trust
- Teamwork
- Mutual Respect
- Innovation

1.3 Equal Opportunity

Bluechips is committed to provide fair and equal treatment to our employees, customers and suppliers irrespective of race, colour, religion, gender, national origin, sexual orientation, marital status, pregnancy, disability or any other protected class.

We expect from our suppliers to extend equal opportunities and fair treatment to all of their employees.

1.4 Child Labour Avoidance

Bluechips is strictly against the use of child labour in any stage of manufacturing or company operation. The term “child” refers to any persons considered underage for employment under the jurisdiction of the company locations.

In addition to upholding this standard within our company, we expect our suppliers to strictly adhere by child labour laws.

The use of workplace apprenticeship programs, which comply with all laws and regulations, is supported.

1.5 Harassment and Bullying

At Bluechips we do not tolerate any form of harassment, sexual harassment and bullying. We expect our employees to treat all fellow employees, customers and suppliers with dignity and respect at all times.

Any type of harassment, including (but not limited to) physical, sexual and verbal is prohibited and can result in disciplinary action up to, and including, termination. Harassment can include actions, language, written words or

objects that create an intimidating or hostile work environment.

We expect all employees, customers and suppliers to communicate and behave in a respectful manner towards each other and to create a harassment free work environment.

1.6 Health and Safety

Bluechips' health and safety standards are required to be complied with by all employees and visitors to Bluechips sites:

- Help maintain hygienic work environment by cleaning up own work areas
- Be considerate in behaviours with a basis how these will affect health and safety
- Wear the correct personal protection equipment (PPE), use the appropriate safety devices and follow proper standard safety systems
- Wear ESD protective suits in all ESD areas

Any workplace injuries, illnesses or unsafe conditions are to be reported immediately to a superior, HR or the nurse on duty at the time.

At Bluechips we reduce the impact of emergency situations where possible by implementing emergency plans and response procedures.

1.7 White Company

Bluechips is classified as a white company. This means we do not encourage the consumption of alcohol and drugs, in particular on Bluechips grounds. To comply as a white company, we

reserve the right to conduct spontaneous random checks for alcohol and drugs amongst our employees.

2. Business Environment

2.1 Compliance with Law

All employees, suppliers and customers are expected to respect and comply with applicable laws, rules and regulations of authorities.

Bluechips abides by the laws and regulations in Thailand. As we have a large number of international customers and suppliers, when dealing with business in foreign countries, we **do our best to** follow and respect the laws and regulations of the respective countries.

In addition, Bluechips does its best to abide by the societal norms of the respective countries and hopes its suppliers and customers to respect the societal norms of its base in Thailand.

2.2 Bribery

Bluechips expects the highest standards of integrity to be upheld in all business interactions. We do not tolerate any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes).

All business dealings are to be performed transparently and reflected accurately in our business books and records.

Employees and suppliers are expected to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-

bribery policies

- Refuse any offer or request for an unlawful payment and report the incident to their manager or Bluechips' HR department where the incident will be escalated accordingly.

2.3 Conflicts of Interest

Bluechips employees are expected not to perform outside work during Bluechips business hours and/or use Bluechips property or confidential information for non-Bluechips related work.

Employees are expected to work in the best interest of Bluechips. If an employee has competing professional or personal interests, a conflict may occur. Bluechips expects from its employees to communicate to their manager or HR if a conflict of interest may arise.

Suppliers and customers are asked to inform the head of Bluechips Procurement department or their Key Account Manager, if they become aware of any activities that could create actual, potential or perceived conflicts of interest.

If the conflict of interest is correlated to a manager, the head of Bluechips Procurement or a Key Account, the contact procedure placed in section 6 should be followed.

2.4 Gifts and Benefits

Offerings and/or gifts of money are forbidden in all cases. Monetary payments can only be made or initiated when contractual goods and services have been performed.

This does not apply to occasions where gifts and infrequent hospitality are of no significant

financial value and when they conform to the usual level of business etiquette.

In the case of business hospitality, the amount that is spent must be appropriate to the nature and scope of hospitality in question.

No gifts, hospitality and other similar benefits are allowed to be accepted or provided by Bluechips employees where the monetary value or any other reason could make the recipient be obligated or compelled into conducting business contrary to regular standards.

2.5 Communication

At Bluechips we expect all of our employees to represent the company loyally both internally and with regards to all external communication.

This involves providing accurate information, protecting confidential information, and engaging in ethical communication.

Acting with respect and with integrity; without prejudice is the fundament to an effective two-way communication flow. It is each employee's responsibility to negate unnecessary conflicts and misunderstanding and resolve any matters with any parties, internal and external in a respectable manner.

In case any issues cannot be resolved it is advisable to go to HR and involve a facilitator to assist in finding a mutual respectable solution.

Communication with external parties should go through official company channels and must be conducted in line with all areas of the company code of conduct.

2.6 Competition, Fair dealings

Standards of fair business, advertising and competition are upheld. Appropriate means to

safeguard customer information are available (in the form of confidentiality agreements) and should be adhered to by all personnel of the company.

3. Intellectual Property

3.1 Confidentiality

Bluechips and its employees are committed to keeping confidential the below:

- Any confidential information in trade, technique, know-how, designs, production, administration, or in other activities, to any person unconcerned or to any third party. This obligation shall remain in full force, even after termination of employment for any reason, including resignation.
- Customer and supplier lists, terms of contracts, pricing information, financial statements, marketing strategies and other information that could damage the company or its customers or suppliers if it were disclosed.
- Information regarding business activities, structure, financial situation and performance.

Falsification of records and misrepresentation of conditions or practices in the supply chain are unacceptable and will result in disciplinary action.

All of our suppliers and customers are expected to maintain personal and sensitive data provided by Bluechips or our customers, in a secure and confidential manner.

3.2 Privacy

Bluechips commits to protecting the reasonable privacy expectation of personal information of everyone we do business with, including suppliers, customers and employees.

Employees are required to report any breaches of privacy, including the loss, theft or unauthorized access to personal information, to their manager and/or the Human Resource department.

We comply with all applicable privacy and information security laws.

3.3 Record Keeping

Bluechips keeps its books, records, accounts and financial statements in a complete, fair, accurate, detailed and timely manner.

3.4 Protection and Proper use of Company Assets and Data

As we heavily invest in specialized equipment and resources, we expect our employees to be active in protecting Bluechips assets, as well as any assets provided to us by our customers and/or suppliers.

All assets should be used for legitimate purposes and for company business only.

For the purpose of this code of conduct, assets include (but are not limited to), facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities and company funds.

Suspected misuse, negligence, theft and/or waste should be reported to the Human Resource department immediately upon being revealed and will result in appropriate

disciplinary action. Failure to report known breaches can result in additional disciplinary actions towards those involved.

From our suppliers and customers we expect the use of Bluechips information and property (including tools, drawings, specification) for the purpose for which they were provided and for no other purpose. These must also not be shared to third-parties unless there was prior approval by Bluechips.

3.5 Information Technology

Bluechips has a clear information systems security policy in place that must be followed strictly by all employees. All information created or received during the course of operations is the property and responsibility of our company and Bluechips is committed to its proper management and effective security.

The company expects its employees to help safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Employees should immediately contact and follow the instructions of the IT department if they recognize that there has been a data leak, misplacement of computer or mobile phone, or notice a cyber-attack on a computer or server. Employees are encouraged to err on the side of caution and report to the IT department in case of any uncertainty in this regard.

4. Environment and Community Involvement

4.1 Environment

Bluechips is dedicated to minimizing the environmental footprint of all of its activities, with projects like solar energy production,

waste reduction and organic farming being some examples.

We have expectations of our employees to:

- Save energy by turning off lights and equipment when not in use
- Use resources as efficiently as possible
- Think of ways to reduce the use of paper and plastic both at work and at home
- Reduce, reuse and recycle

4.2 Political Contributions

Bluechips does not make any political contributions.

Employees are free to support any political party on a personal level. However, this must be kept separate from company business. No company resources shall be used for displaying, communicating and/or supporting any political parties or affiliations.

4.3 Corporate Social Responsibility

Bluechips is committed to contributing to our community in meaningful, sustainable ways. As a result, we have a number of initiatives to positively impact the lives of our direct community and of those in the wider region. This can manifest itself via financial donations, time spent with vulnerable parties, donations of practical equipment or through community engagement.

We are also particularly active within the art community in order to benefit our community beyond strictly superficial means.

Our employees have been, and remain, crucial towards our community efforts and are encouraged to continue their engagement with these initiatives. Additionally, further

sustainable and meaningful initiatives from our employees are actively sought by the company in order to further benefit the lives of those outside the organization.

4.4 Health & Wellbeing

At Bluechips we encourage active lifestyles along with a healthy work life balance.

Our campus has the facilities to exercise; people are encouraged to take part in team sports and friendly competitions.

5. Decision-Making and the Code of Conduct

At Bluechips we encourage our employees to take responsibility and have a sense of ownership. Employees are expected to make their own decisions and take responsibility for their actions.

Our employees are asked to consider the following when making decisions to ensure they are ethical:

- Does the decision comply with the code of conduct laid out above and does it comply with any applicable law or regulation?
- Could this action affect Bluechips and/or the employee negatively if it became public?
- Can I explain my actions to the general public, authorities and/or customers?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?

If there is uncertainty, our employees are encouraged to ask a superior or discuss with the management team.

6. Reporting/Speaking-Up

In the event that an employee feels there has been a compliance violation we encourage our employees to get immediate help and advice.

Employees are highly encouraged to report suspected unethical, illegal or suspicious behavior immediately.

Bluechips' supervisors, leaders and managers alike have the added responsibility to ensure compliance with the code of conduct within their teams. It is their responsibility to not only deliver successful business results but to additionally drive a culture of integrity throughout their teams. Bluechips expects those in leadership roles to foster an atmosphere of openness and transparency so that all members of the Bluechips team feel comfortable to speak up and make their concerns known.

There are three possible channels for the employee to speak up:

1. Promptly communicate any compliance concerns to your line leader and/or manager.
2. If you feel uncomfortable discussing a concern with your line leader and/or manager, please speak up to HR through direct contact, the suggestion box located on the first floor or through telephone means available 24/7.

If requested, anonymity can be assured.

3. If an external anonymous contact is required, the following lawyer may be contacted:

Sumalee Jennapa LLb., Barrister-at-law
Advocates & Solicitors
Tel. 053-142366
E-mail: sumalee@29tanin.com

As a lawyer, Mrs. Sumalee Jennapa is obliged to absolute confidentiality and may pass on the provided information to Bluechips only if it is with consent of the information provider.

Bluechips does not tolerate any retaliation against anyone who makes a report of suspected misconduct in good faith. Employees who report a concern in good faith will not be subjected to any adverse employment action.

We are confident that if followed, this code of conduct will lead to successful long-term partnerships for all involved parties.

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For the most current version of
the Code of Conduct,
updates and other information
please go to www.bluechips.co.th