

CODE OF CONDUCT.

Semcon's Code of Conduct is based on the UN Global Compact. It has been adopted by Semcon AB's board of directors to emphasize the principles that govern the company in relation to its employees, business partners, shareholders and the world around us. The Code of Conduct is a compilation of the policies and guidelines that further form the basis for Semcon's business activities. All Semcon employees must comply with this Code of Conduct and Semcon require the same from all its business partners.

INTRODUCTION

Semcon's reputation and continued reward for new innovations within product development based on human behaviour will not only depend on the quality of services but also on how the services are provided.

When doing business Semcon shall build relationships based on respect, responsibility and trust with employees, business partners and shareholders, and do it in a socially, sustainable and responsible manner. Achieving this requires long-term profitability, sustainable consideration and social commitment.

In light of the above, Semcon shall act in a socially responsible way. This implies that Semcon in addition to be fully compliant with laws and regulations also needs to deal with ethical and moral issues. Even if the Code of Conduct cannot address all possible dilemmas that might arise, it gives guidance on our business ethics and clarifies how we shall act towards each other, customers, shareholders and the world around us.

THE PRINCIPLES

Principles of human rights and labour issues

Our employees are our most important and most valuable resource. Their expertise, motivation, respect and commitment are extremely important, both in business contacts and to create good relationships.

Human Rights

Semcon shall support and respect the protection of internationally proclaimed human rights and make sure the company is not complicit in human rights abuses. Semcon shall take voluntary actions to contribute towards the protection and fulfilment of human rights in our society.

Non-discrimination

All of Semcon's employees shall be treated equally, fairly and with respect, irrespective of: gender, age, religion, ethnicity, cultural and social background, birthplace, disability, sexual orientation, gender identity, gender expression, union representation or political views. When recruiting, conducting performance and development discussions, promoting or other mutual actions, Semcon shall always treat people equally.

Forced labour

Semcon shall not support forced labour, nor shall any employee need to make a deposit when the person concerned begins their employment.

Child labour

Semcon shall not undertake or tolerate child labour. Children are defined as individuals under 16, unless the local legislation for minimum age is higher in order to start work, or has an obligatory school leaving age. In such cases the higher age shall apply.

Freedom of association

Semcon respects all employees' rights to form and be a member of associations and organizations and trade union membership and to sign collective agreements, in line with national law and practices. Semcon will ensure that the official representatives of such trade union associations are not subject to any form of discrimination.

Working hours and compensation

Semcon undertakes to pay reasonable salaries and benefits in accordance with the relevant norms in all areas where Semcon carries out its business activities. Semcon shall observe applicable laws and norms for industries on the issue of working hours in all countries where Semcon has business activities.

Workplace practice

Semcon actively strives to constantly improve health and safety in the workplace and works towards providing employees with a safe working environment. All Semcon units shall at least adhere to national laws and/or collective agreements. Semcon shall ensure that registration, storage and use of employee information are treated strictly confidentially and in accordance with local legislation.

Principles of environmental sustainability

Semcon is committed to contributing to sustainable development. This responsibility is shared by all employees throughout Semcon.

Environment

All our actions have an impact on the environment around us. Caring about the environment is a natural part of our daily business in so that we shall always aim to reduce environmental risks and our footprint in the environment. Semcon sets our specified environmental position to reduce our environmental footprint, and all employees shall follow Semcon's

environmental activities regarding purchasing, travelling, meetings and waste management.

Semcon supports a precautionary approach to environmental challenges, undertakes initiatives to promote greater environmental responsibility and encourages the development and diffusion of environmental-friendly technologies.

Semcon also participates in co-operations and research projects with the aim to support green technology.

Principles of anti-corruption and fair competition

We are against all forms of corruption and believe in free and fair competition. Our attitude to our stakeholders should always be characterized by impartiality, quality, respect and dialogue.

Anti-Corruption

Semcon shall not participate in or endorse any corrupt practices. Semcon shall never provide customers, potential customers, governments, authorities or representatives of such organizations with any rewards or benefits that breach existing laws or reasonable and accepted business practices.

Gifts and other benefits such as expected hospitality from Semcon shall not exceed local custom and shall be in line with local legislation in all countries where Semcon has business activities.

Semcon's employees are not permitted to accept payments, gifts or other remuneration from third parties that can affect, or that can be perceived to affect, the objectivity of business decisions.

Semcon's employees shall handle private activities, other external activities and financial interests in a way that doesn't contravene, or are considered to contravene, Semcon's interests.

Money laundering

Semcon shall not accept, facilitate or support money laundering.

Fair competition practices

Semcon shall not exchange information or enter into agreements or understandings with competitors, customers or suppliers in a way that prevents or restricts fair competition practice

GENERAL

Principles of business conduct

We believe that integrity, respect and fairness will gain trust to our business and services. It is therefore of importance that our business at all times is conducted on such basic principles on business conduct.

Communication

Semcon supports transparency and openness. Semcon encourages continuous dialogue with the company's interested parties. Confidential business details that can damage Semcon's competitive strength and/or contacts with customers or partners must however remain secret.

Marketing and sales

Semcon shall present its services accurately and shall comply with applicable regulatory and legal requirements. Semcon shall not make false statements or provide misleading information regarding its services or their performance.

Political involvement

Semcon takes a neutral stance in terms of political affiliation and candidates. Neither Semcon's corporate identity, nor its assets will be used to promote political interests, parties or candidates.

Company property and resources

Semcon's property and resources shall be used for business objectives. The property and resources shall not be used for personal gain, fraudulent purposes, or in any other inappropriate manner.

Accounting and reporting

Semcon's financial transactions shall always be reported in accordance with generally accepted accounting principles and accounting must report transactions' character in a correct and non-misleading manner. Semcon's reporting will be open, truthful, relevant, and understandable and issued at the required time. When important decisions are made concerning strategies and action alternatives, the yield on invested capital shall always be taken into consideration.

Taxation

Semcon shall comply with the tax laws and regulations of each country in which it operates. Where tax laws do not give clear guidance, prudence and transparency shall be the guiding principles.

Shareholders

Semcon keeps its shareholders well-informed about its business and financial development in accordance with requirements of Nasdaq Stockholm.

Insider trading

Semcon employees who have access to non-public information that may affect the Semcon share price are not allowed to buy or sell Semcon shares or any other financial instruments that relate to the Semcon share, such as futures or options in accordance with applicable law. In addition, such Semcon employee may not induce anyone else, by giving advice or in some other manner, to undertake such trading.

Ethical Council

Semcon shall act in an ethical manner in all contacts with its stakeholders. On occasions when there is uncertainty from an ethical point of view about Semcon cooperation, the matter shall be referred to Semcon's Ethics Council. The Ethical Council includes the group management and the sustainability manager.

REQUIREMENTS ON BUSINESS PARTNERS

Semcon require all its business partners to apply the principles outlined in this Code of Conduct. The principles will further be applied when evaluating current and prospective business partners.

REPORTING ROUTINE

All employees are encouraged to report suspected violations of this Code of Conduct, laws or regulations, to its superior or the manager of its superior or in accordance with Semcon's Whistleblowing Policy.

PERIODIC REVIEW

Semcon's Code of Conduct has been adopted by Semcon AB's board of directors. The Code of Conduct can only be altered or revoked by the board of directors.

Semcon AB's board of directors 2017
