

DEK Technologies Vietnam Code of Conduct Policy

1 Purpose

This policy affirms DEK Technologies Vietnam's and all members commitment to:

- integrity being the foundation of all our decisions and actions
 - integrity in how we do business
 - integrity in how we treat one another
 - integrity in how we handle our information
- fair play - having a culture of fairness, following the rules, respecting each other, looking for win-win solutions
- being a socially responsible organisation [1] [2]

2 Effective Date

This version of the policy is effective from the 1st of December 2020.

3 Principles

We believe in and follow (even when no one is watching):

- doing the right thing, in the right way, and for the right reasons
- keeping our commitments

Every member is obliged to personally live up to the high ethical standards we have set for ourselves in the Code of Conduct, as well as to help prevent, detect, and respond to violations of the Code of Conduct.

Members at all levels must provide guidance and support so their colleagues make the right decisions and play fair.

It is the responsibility of every member to understand and follow the Code of Conduct.

Any member who reasonably suspects that a violation of the Code of Conduct has occurred or is likely to occur, must report their concerns immediately. There are several ways to do this – including anonymously. Importantly, DEK Technologies Vietnam will never retaliate against any member who reports such a suspicion.

4 Policy

4.1 Integrity in How We Do Business

4.1.1 Preventing bribery and corruption

We never tolerate bribery or corruption [3]. A bribe is any item of value offered with the intent to create an inappropriate business advantage or for any other illegitimate business purpose. Bribes can take many forms, including money, gifts, tickets, entertainment, travel, promises of employment or future business relationships, or even charitable donations when made for an improper purpose. Corruption is any abuse of a position of trust for inappropriate personal gain.

All members must:

- Immediately reject any bribes and never offer any bribes to anyone under any circumstances;
- Recognize and take steps to stop any potential bribery or corruption or the appearance of bribery or corruption involving DEK Technologies Vietnam or any of our partners;
- Report any suspected, actual, attempted, or potential instances of bribery or corruption involving any members or partners

4.1.2 Gifts, tickets and entertainment

We can offer and accept gifts, tickets and entertainment transparently and for legitimate business purpose only [3]. Gifts, tickets and entertainment broadly cover anything that is of value, is personal in nature, and is offered, accepted, received, or provided to or by someone outside DEK Technologies Vietnam. This includes meals, tickets or invitations to games or events, offers of paid-for travel, holiday gifts, and other personal gifts.

Any time gifts, tickets, or entertainment are involved, members must ask themselves:

- Is the gift, ticket, or entertainment excessive or disproportionate in value, given the circumstances?
- Is it being offered and approved in something less than a fully transparent manner?
- Is it being offered for something other than a legitimate business purpose?
- Are there ongoing negotiations between DEK Technologies Vietnam and the offeror or recipient?
- Is the offeror or recipient a public official?
- Could anyone view the gift, ticket, or entertainment as creating an expectation of anything of value, including a business opportunity, in return?

If the answer to any of these questions is “yes”, the gift, ticket, or entertainment in question requires additional review. In such instances, contact the Compliance Team for additional guidance.

All offered and accepted gifts must be registered and recorded.

4.1.3 Recognizing and avoiding conflicts of interest

When performing our jobs, we never put our own interests above DEK Technologies Vietnam interests [3]. A conflict of interest exists when a member's personal interests' conflict with, interfere with, or take preference over DEK Technologies Vietnam's best interests. Conflicts of interest can arise in many circumstances, including when members have personal or business relationships with vendors, customers, competitors, or other business partners. Conflicts of interest can also arise from personal or business relationships between members, including romantic relationships. A member's outside business activities can also conflict with DEK Technologies Vietnam's business interests.

All members must:

- Use good judgment and recognize when a personal or business relationship creates a conflict of interest or the appearance of a conflict of interest;
- Be transparent about and document with the Compliance Team their personal or business relationships which may create an actual or potential conflict of interest or the appearance of one;
- Comply with all procurement policies when assessing, selecting, and managing suppliers, vendors, or other partners, including by always choosing and managing business partners on objective criteria such as quality, price, reliability, and suitability for the identified need; and
- Report any suspected, actual, or potential conflict of interest, including on the part of fellow members, to the Compliance Team.

4.1.4 Maintaining a Partnership Relationship with our Customers

Our success comes from making our customers successful, helping them to produce high quality and effective products and services. We take ownership to ensure that we collectively make the best products and services; we consider our output as a reflection of ourselves.

We are partners with our customers, we follow an open, honest and transparent way of working. We work together to overcome any challenges.

We agree to comply and follow the rules, policies, and processes, as specified by each customer.

4.1.5 Maintaining Proper Relationship with the Government

DEK Technologies Vietnam interacts with the government and government officials. We always interact openly and transparently, and never seek to improperly influence a government official, create an expectation of special treatment, or for any other improper purpose. This is true with respect to all public institutions and enterprises, regardless of whether it is at the international, national, local, or even city or town level.

4.1.6 Complying with Laws

We comply with all laws and regulations applicable in each country or other jurisdiction in which DEK Technologies Vietnam does business. This includes all laws or regulations related to trade and other sanctions, customs, import and export controls, money laundering, and terrorism financing [4]. We hold ourselves and our partners to the highest standard in following these rules, without exception.

Any member who learns or suspects DEK Technologies Vietnam, a fellow member, or a business partner has failed to comply with the law or intends to break the law is expected to immediately contact the Compliance Team.

4.2 Integrity in How We Treat One Another

4.2.1 Supporting a Diverse Workforce and a Culture of Inclusion

We are committed to fostering a respectful, equitable and inclusive environment for all members.

Diversity at DEK Technologies Vietnam means ensuring our teams and workplace reflect the vibrant range of our customers and communities, inclusive of race, color, gender identity, sexual orientation, ability, age, education, background, and other factors. Inclusion means championing individual uniqueness and creating a feeling of belonging.

All members must:

- Treat everyone with fairness and respect;
- Demonstrate an open and inclusive mindset by deliberately seeking out, listening to, and learning from different ideas, perspectives, and approaches when building teams and collaborating on projects; and
- Recognize and confront their own personal blind spots to foster understanding of one another's differences.

4.2.2 Preventing Harassment and Discrimination

Discrimination is any unjust or prejudicial treatment of a person based on their actual or perceived association with a certain identity or characteristic, such as race, color, age, gender identity, ability, sexual orientation, religion, or any other characteristic.

Harassment is verbal or physical conduct degrading or showing hostility or aversion toward an individual. In the workplace, this includes any conduct unreasonably affecting or interfering with an individual's ability to do their work or creating an intimidating, hostile, or offensive work environment.

Harassment includes but is not limited to:

- Derogatory comments, epithets, slurs, jokes, pranks, stereotypes, and insults;
- The creation or sharing of written materials, pictures, cartoons, or electronic messages that are degrading to an employee or group; and
- Sexual harassment, such as unwelcome sexual advances.

Our rule is extremely simple: DEK Technologies Vietnam does not tolerate discrimination or harassment by any member or partner in any form.

All members must:

- Adhere to DEK Technologies Vietnam zero-tolerance commitment against discrimination, harassment, and sexual harassment, and demonstrate leadership and voice their disapproval any time they witness conduct that they believe violates this commitment;

- Be sensitive to conduct that might be acceptable to some cultures, backgrounds, or perspectives but not to others; and
- Report any instances of discrimination or harassment, including sexual harassment, to Human Resources or the Compliance Team.

4.2.3 Ensuring a Safe Workplace

We do not compromise on our members' health and safety [5]. We conduct business in a sustainable, safe, and healthy manner, including by providing safe working environments and complying with all local health and safety laws and regulations.

All members must use all provided safety equipment at all appropriate times and, when necessary and if safe to do so, immediately address any unsafe working conditions.

Members also must report any unsafe working conditions – including any fellow members who appear to be risking their safety or the safety of their fellow members – to Human Resources.

We totally detest all forms of modern slavery. Modern slavery is a term used to cover a range of exploitative practices including human trafficking, slavery, forced labour, child labour, and slavery-like practices.

4.3 Integrity in How We Handle Our Information

4.3.1 Maintaining Accurate Records

Every member has the responsibility to maintain complete, accurate and timely records.

Almost every compilation of information we create while performing our jobs is a company record.

All members must:

- Always accurately document the necessary information relating to transactions in a timely manner, and never purposely alter or omit information to present an inaccurate picture of a transaction;
- Refuse to record inaccurate information and promptly report any suspicious transactions or requests to record inaccurate information to the Compliance Team; and
- Retain all documents and records in compliance with company processes, policies, and accounting rules, including all documents subject to any threatened or pending legal proceeding.

4.3.2 Protecting Our and Our Customer's Sensitive Information

We protect our company by being security-conscious and safeguarding our and our customers information [6].

Most of the information we create and use in our jobs is either intended for purely internal use or will only be disclosed publicly at a certain time and for a certain purpose. Sensitive information can take many forms, including trade secrets, new product designs, research, financial forecasts and projections, etc.

Virtually all the information we generate is stored digitally in the DEK Technologies Vietnam ICT landscape. Information security is the practice of protecting the information in our ICT landscape by

restricting any unauthorized or otherwise inappropriate access, disclosure, destruction, modification, or copying of such information.

Any disclosure of sensitive information outside of DEK Technologies Vietnam – or, for some types of information, even within the company – is strictly controlled to best protect the interests of our company, partners, customers, and fellow members. It is critical we observe information security best practices to ensure these interests are adequately protected. It is also important we remain vigilant against inadvertent disclosure of sensitive information, which can be just as damaging to the company as intentional disclosures or theft.

All members must:

- Never disclose DEK Technologies Vietnam strategic plans, financial outlook, new product pipeline or designs, or other sensitive information to unauthorized persons, including family members or friends;
- Protect the company's sensitive information from inadvertent disclosure by never creating, accessing, or using our sensitive information in a public setting where it may be overheard or viewed;
- Protect sensitive information from theft by only utilizing company-provided tools and software, and by creating and safeguarding passwords in accordance to our policies and standards; and
- Comply with our Global and Local ICT Policies and all related policies and standards regarding our ICT landscape and information security at DEK Technologies Vietnam [7] [8] [9].

4.3.3

Protecting Privacy

We protect the personal information of our members, customers, and our partners [10].

Personal information is any information that directly or indirectly identifies and describes an individual. This personal information may relate to our fellow members, customers, our business partners, or other third parties.

Privacy is the right for individuals to know about and influence how and why their personal information is collected and handled.

Handling personal information with appropriate care and respect is essential to building trust, protecting our brand reputation and achieving our strategic goals. Additionally, there are privacy laws and regulations virtually everywhere we do business. Any failure to comply with those laws could result in fines, penalties, lawsuits, or other sanctions against DEK Technologies Vietnam or our members.

All members must:

- Only use personal information for authorized purposes and within their job description;
- Ensure personal information is not disclosed to unauthorized internal or external parties;
- If in doubt, ask the General Director how to handle personal information; and
- Immediately report any known or suspected unauthorized use or disclosure of personal information.

5 Responsibilities

Every member is responsible for assisting the prevention, detection, and responding to potential violations of this Code of Conduct. This includes a steadfast expectation that members speak up any time they believe a violation of the Code of Conduct has occurred or is likely to occur.

Any member who reports their reasonable suspicion of a violation or potential violation of our Code of Conduct is protected against any form of retaliation, regardless of whether the employee's suspicion turns out to be valid. Conversely, any employee who retaliates or attempts to retaliate against a fellow employee who has reported or intends to report a suspected violation of the Code of Conduct – including by pressuring or threatening the reporting employee not to report the suspected violation – may be subject to discipline themselves.

If you are aware of a violation or potential violation of our Code of Conduct, please take one of the following actions immediately:

- Email the Compliance Team at fairplay@dektech.com.au;
- Submit a report – anonymously, if you so choose – via our Fair Play webform;
- Speak with your Line Manager, Human Resources, Trade Union, or General Director;
- Follow the DEK Technologies Vietnam Escalation Policy [11].

The same applies if you believe you are being pressured, threatened, or otherwise retaliated against in connection with reporting or intending to report a suspected violation of the Code of Conduct.

6 Reference documents

- [1] DEK Technologies Vietnam Environmental Policy
- [2] DEK Technologies Vietnam Foundation Policy
- [3] DEK Technologies Anti-Corruption and Anti-Bribery Policy
- [4] DEK Export Control Policy
- [5] DEK Technologies Vietnam Health & Safety Policy
- [6] DEK Technologies Vietnam Confidentiality Policy
- [7] DEK Technologies ICT Policy
- [8] DEK Technologies Employee ICT Policy and Procedure
- [9] ICT Policy variations for DEK-Vietnam
- [10] DEK Technologies Personal Data Policy
- [11] DEK Technologies Vietnam Escalation Policy