

Code of Conduct

The

This Code of Conduct (the “Code”) applies to directors, officers, employees, consultants, representatives, and agents of Benchmark Electronics, Inc. and its subsidiaries (the “Company”). The code is fundamental to how we do business, and reinforces the responsibilities we all share in protecting the Company’s reputation.

The Company’s commitment to ethics and excellence sets the foundation for the Code, which defines the standards for how we do business. It reflects our commitment to conducting our global operations according to the highest ethical standards.

Our Mission

At Benchmark, our mission is to be the Solutions Provider of choice for High Technology OEM Customers, anticipating their needs and rapidly delivering comprehensive value-creation solutions during the entire Product Life Cycle by providing:

- Innovative Design Engineering Services
- Optimized Global Supply Chain & Logistics Solutions
- World-Class Manufacturing and After-Market Support

Our mission is based on a foundation of financial strength, managerial integrity and a culture of operational excellence and continuous improvement.

Our Vision

At Benchmark, our vision is to create superior value for our customers, employees and shareholders. Our vision directs our business activities to maintain a tenacious pursuit-of-excellence focus on what we must accomplish to continue on the path of sustainable, quality growth.

Superior Team: Be a great place to work which inspires the best in our teams.

Total Customer Solutions: Be the provider that goes beyond satisfying our customer needs with solutions that anticipate their requirements.

Social Responsibility: Promote environmentally and socially sound fundamentals in our business practices.

Shareholder Value: Maximize our long-term return to shareowners while maintaining the highest integrity in all our activities.

Our Values

Customer Focus:

- Focus on the needs of our customers.
- Be in the marketplace as active learners and listeners.
- Have a global view.
- Drive improvement in execution every day.
- Be constructively inquisitive.

Working Smart:

- Act with urgency.
- Improve what matters by investing your time wisely.
- Have the courage to change course when needed.
- Remain dissatisfied with status quo.
- Work efficiently.

Acting Like an Owner:

- Be accountable for our actions and inactions.
- Focus on building value.
- Empower and reward our people for taking risks and finding better ways to solve problems.
- Continuously learn – from both our successes and failures.



Paul J. Tufano

President & CEO

Benchmark Electronics, Inc.

Dear Fellow Employee,

Benchmark has a long history of operational excellence, which is reflected in our commitments to the Company and to our customers. That standard of excellence applies not only to our operations, but to the way we treat each other, our customers and others. We are committed to acting ethically and honestly in all that we do. The **Code of Conduct** provides general guidance as to how we do that.

The Code of Conduct applies to each of us as employees of the Company and to our Board of Directors as well. It reflects standards that we must adhere to, not simply aspire to.

As noted, the standards discussed in the Code are necessarily general. If you have a question about the right thing to do or concerns about possible violations, you should talk with your supervisor or local Human Resources representative, or contact the **Ethics & Compliance Office** at Ethics-Compliance@bench.com or through the **HelpLine**: (Outside the US +1) **979-331-1315** or **Internal VOIP: 775-1315**—which may be done anonymously.

Please review the Code of Conduct regularly. Our integrity, and our compliance with the Code, are essential to our success as a company.

Thank you for your hard work and for the way in which you perform it.

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1

Be Ethical

1.1 Make Ethical Decisions

In all situations, the Company expects employees to shape their business decisions and behavior as guided by the Code, as well as the ethical values the Code exemplifies. While the Code provides guidance on a wide scope of topics, it cannot address every ethical question or situation that you may face on a day to day basis.

**Ask
yourself
these four
questions**

When faced with an ethical decision, you might ask:

- *Is my decision fair, honest, and consistent with the spirit and principles set forth in the Code?*
- *Is my decision consistent with all applicable laws and regulations?*
- *Will my decision advance the Company's goals and objectives?*
- *If called upon, would I be comfortable explaining my decision to my co-workers, superiors and the general public?*

If you have doubts about your decision, you should seek the advice and counsel of your manager, or local Human Resources representatives as appropriate. If you are not comfortable with these avenues of addressing your concerns, there are other ways that you can pose questions or seek advice detailed later in this Code.

1.2 Avoid Conflicts of Interest

The Code requires directors, officers, employees, consultants, representatives, and agents to avoid conflicts of interest between their obligations to the Company and their personal affairs, and situations that may appear to present a conflict of interest.

Generally, a conflict of interest may arise when:

- *Your position or job responsibilities present an opportunity for personal gain.*
- *An obligation or situation resulting from your personal activities or financial interests may influence your judgment or actions in the performance of your job duties.*



It is impossible to describe every situation that could be viewed as a conflict of interest. The following discussion describes a few general examples of conflicts of interest.

1.2.1 *Outside Commercial Interests and Investments*

Outside ownership or financial interests could present a conflict of interest, if in a Company competitor, supplier or vendor, or any material interest in assets or property sold or leased to the Company. Except in rare circumstances, less than 1% stock ownership in a publicly traded company or less than 5% ownership in a privately held company do not represent a conflict of interest.

1.2.2 *Service on Outside Boards of Directors*

Directors of companies are charged with fiduciary duties toward that company, which could require the director to put that company's interests ahead of the Company's. For this reason, you must get prior written approval from the Company Board of Directors before you accept a directorship on the board of any outside company.

1.2.3 Gifts, Entertainment & Kickbacks

Modest gifts are generally acceptable



Business partners often use the exchange of gifts and entertainment to build goodwill. One basic principle underlies the exchange of gifts and entertainment worldwide: gifts or entertainment can become improper kickbacks if intended to obligate or unduly influence the recipient. Payments of cash are always improper. Kickbacks are not limited to cash payments, and can be any offer, promise of, or payment of anything of value, including gifts and entertainment, that are intended to influence the recipient to make a favorable business decision. Unsolicited modest gifts of nominal value, such as meals, tickets to the theater, or promotional items of a general advertising nature (such as imprinted pencils, memo pads and calendars) are generally acceptable to receive and give.

While gifts and entertainment are often expressions of cordial business relationships, they can nevertheless interfere with an employees' independent business judgment. Employees should exercise good judgment and moderation by only offering or accepting gifts or entertainment to the extent they are in accordance with reasonable customs in the marketplace and this Code. Accounting records and supporting documentation reflecting all gifts and entertainment and who received them must be accurately stated.

For more information, see the Benchmark Gifts and Entertainment Policy and the Benchmark Anticorruption Policy.

1.2.4 Outside Employment

If you are a Company employee and also employed by a company that competes with or provides goods or services to the Company, or if your relationship with such an outside company could in any way influence your duties or decisions at the Company, you must immediately report this conflict of interest to your supervisor. These reports must be forwarded to Corporate Legal for review and approval. This type of situation may require you, as a Company employee, to terminate your outside employment. You cannot use Company resources in any way to further or facilitate your outside employment.

1.2.5 Avoid the Appearance of Conflict

Because the appearance of a conflict of interest can be just as harmful as an actual conflict, employees should avoid situations that might be viewed as conflicting with the best interests of the Company. If you find yourself in a position where a potential conflict of interest exists or could arise, contact your manager or Human Resources representative to disclose the information, or you may contact the Office of Ethics & Compliance or the HelpLine (see Section 6). Any relationship or activity which could or would influence, or appear to influence, performance of one's duties to the Company, must be disclosed to the Chief Compliance Officer or the General Counsel for review and resolution.

1.2.6 Corporate Opportunities

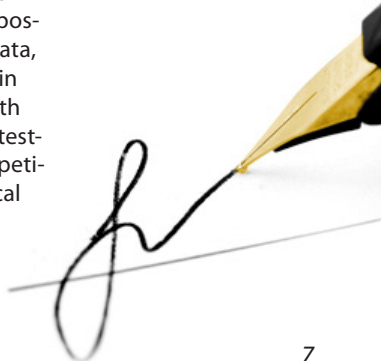
Directors, officers, and employees are prohibited from personally taking for themselves opportunities discovered through the use of Company information, position, or property without the consent of the Board of Directors. No Company information, position, or property may be used for improper personal gain, and no director, officer, or employee may compete with the Company directly or indirectly. Actual or potential conflicts of interest must be disclosed and resolved in accordance with Company policy, in consultation with the Chief Compliance Officer, the General Counsel, or, in certain cases, with the Board of Directors.

No Company asset may be used for improper personal gain

1.3 Market, Bid, Negotiate, and Perform in Good Faith

Truthful and accurate communication of information about our products and services is essential to meeting our commitments to our customers. Employees must be honest in marketing, in preparing bid proposals based on properly estimated cost and pricing data, and in truthfully negotiating contracts. Excellence in performance must be based on our compliance with contract specifications and associated quality and testing requirements. We seek to outperform our competition fairly and honestly, and never through unethical or illegal business practices.

Signature



2 *Be Respectful*

2.1 *Treat People with Respect and Dignity*

Employees are expected to treat one another, customers, and business partners with respect and dignity. We value an inclusive workforce because it promotes diversity of thinking, reaching solutions that help us achieve excellence, and meeting the needs of our customers.



Exercise good judgment when performing your duties and act in an appropriate manner while at work or when representing the Company, even in a social or recreational setting. Remember that an employee's personal behavior affects the perception others have about the Company. Avoid all activities that could call into question the Company's compliance with legal requirements or ethical standards.

2.2 Observe Employment and Labor Laws

The Company is committed to fair employment practices for our employees and providing a safe and quality work environment. Company leaders at all levels have a special obligation to encourage an open work environment and ethical culture, where employees are treated respectfully and may raise issues or concerns without fear of retaliation.

It is the Company's policy to act in accordance with all applicable employment and labor laws and regulations, including without limitation:

- *Offering a safety and health program that conforms to the best practices of organizations of our type, to reduce the number of occupational injuries and illnesses to a minimum.*
- *A work environment free from any physical, sexual, psychological, verbal or visual harassment or abuse.*
- *Maintaining a drug-free, secure workplace.*
- *Compliance with all non-discrimination requirements.*
- *Complying with applicable local law on workweeks, days off and maximum hours employees are permitted to work.*
- *Paying employees at least the minimum wage required by local law and providing all legally mandated benefits.*
- *Ensuring that neither forced, indentured, involuntary prison, or bonded labor, nor slavery or trafficking of persons is used.*
- *Observing the minimum age requirement for employment consistent with local law and Company policy.*

Benchmark's Employment and Labor Policy

You are responsible to follow safety and health rules and to report to your manager any accidents, injuries, and unsafe equipment, practices, or conditions.

Your work environment should be safe – without threats of violence, bodily harm or physical intimidation. Don't even joke about it; it is simply not tolerated.

Report workplace violence

Workplace violence includes:

- Physical, verbal or written threats
- Violent or threatening behavior
- Conduct that threatens safety in the workplace

It is your responsibility to report anything that could reasonably be considered violent or threatening behavior.

2.3 Personal Relationships

Intimate personal relationships between managers and subordinates are prohibited. This includes a dating or other intimate personal relationship between a manager and any person subject to their scope of supervision, influence or the ability to affect the terms, conditions or status of the subordinate's employment. Any such situation should be immediately disclosed to your Human Resources representative.

2.4 Data Privacy

Respect the privacy rights and interests of all employees and individual stakeholders in their personal information. The Company is committed to taking appropriate measures to protect employees' personal information against unauthorized access and to use it only for legitimate business purposes. Collect, use and process personal information responsibly and in accordance with applicable laws.

3

Be Sustainable

The Company strives to protect the environment, conserve energy and natural resources, and prevent pollution. The Company seeks compliance with applicable environmental laws and regulations by applying appropriate management technology and practices. All Company manufacturing facilities are either currently certified or undergoing certification to ISO 14001, which will drive continuous improvement in these areas.

Each employee is responsible for observing sensible environmental practices. Together, we have a responsibility to be good neighbors and contributing corporate citizens in our communities.



4 *Be Compliant*

4.1 *Maintain Our Financial Integrity*

The Company's financial books and records shall properly document all assets and liabilities, accurately reflect all transactions, and are retained in accordance with Company policy and applicable laws and regulations. Company funds may not be used for any unethical purpose. No false entries shall be made in the books or records of the Company or its subsidiaries for any reason. Undisclosed or unrecorded funds or assets may not be established.

All Company books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, and conform to applicable legal requirements and to our system of internal controls. All transactions must be supported by accurate documentation in reasonable detail, recorded in the proper amount and placed in the proper accounting period. You should never feel pressured to make false or misleading financial entries on the Company books and records. You may not interfere with or improperly influence any audit of the Company's financial statements. The intentional manipulation of financial data violates Company policy and the law, and is considered fraud.

4.1.1 *Prevent Fraud*

The Company is committed to preventing fraud. Fraud includes "any intentional or deliberate act committed to secure unfair or unlawful gain or to deprive another of property or money by guile, deception or other unfair means."

Examples of situations that might involve fraud

- Committing dishonest acts
- Intentionally recording a false or misleading transaction or accounting entry
- Manipulation of Company records
- Forging or altering Company checks
- Misappropriating assets of the Company, employee, customer or supplier
- Submitting for reimbursement false or inappropriate expenditures
- Engaging in bribery, embezzlement or money laundering
- Using or taking Company property or funds for private use

Remember that fraud can be committed by either employees or external parties. The Company is committed to continuously enhancing its policies and procedures to help prevent, detect and deter fraud.

4.1.2 Keep Accurate Labor, Material and Other Cost Records

Accurately charging labor, material and other costs is essential to maintain the integrity of customer billings, financial reporting, and planning. Deliberate mischarging of work time or timecard fraud violates Company policy and the law. Knowingly charging an unauthorized account or cost objective, or knowingly approving such mischarging, or shifting of costs to improper accounts is prohibited. Each employee is responsible for ensuring that labor, travel, material, and other expenses are recorded truthfully.

4.1.3 Retain Records Appropriately

Records should always be retained or destroyed in accordance with the Company records management policy. In the event of litigation or governmental investigation, the Company's General Counsel must be consulted regarding record retention issues.

4.1.4 Report Financial Record Concerns

Any concerns about financial reporting should be raised with your manager, the Finance Department, Internal Audit, the General Counsel, the Chief Compliance Officer, the HelpLine, or the Audit Committee of

the Board of Directors. Complaints or concerns regarding the Company's accounting, internal accounting controls, or auditing matters may be communicated anonymously or confidentially to the Audit Committee either through the HelpLine or by writing to the Audit Committee, Attention, Audit Committee Chairperson, at the Benchmark Electronics Corporate Headquarters (address located at the end of the Code), in a sealed envelope marked *confidential*.

4.2 Comply with the Code, Law and Regulations

The Code applies to everyone at Benchmark

This Code is intended to apply globally to all Company directors, officers, employees, consultants, representatives, agents, subsidiaries and sites, in accordance with the laws of each respective country and jurisdiction in which they operate. It is a condition of your employment to conduct yourself and Company business in accordance with the Code.

4.2.1 Local Rules

Where necessary, various sites or subsidiaries may adopt "Local Rules", such as policies and procedures to address specifics of applicable local laws of that site or subsidiary. This Code is not intended to supersede Local Rules that are required to comply with applicable local laws; however, if this Code conflicts with any Local Rules which are not required by applicable local law, this Code governs. Neither this Code nor any Local Rules implies any employment contract or any third party contract.

4.2.2 Conflicts with Local Law

All Company directors, officers, employees, consultants, representatives, agents, subsidiaries and sites must respect and obey applicable laws and regulations. The Company is governed by the laws, statutes and regulations of multiple domestic and foreign jurisdictions. If the Code conflicts with applicable laws, statutes or regulations of any particular country or jurisdiction, the Code is deemed to be modified only to the extent required to bring the Code into legal compliance with that jurisdiction's applicable laws, statutes, and regulations.

4.2.3 Comply with Anticorruption Laws

Directors, officers, employees, consultants, representatives, and agents must protect the Company's reputation for integrity in the global marketplace. Avoid any improper international business practices and comply with all applicable laws, such as the U.S. Foreign Corrupt Practices Act (FCPA), similar laws of host nations, and related anti-bribery conventions. The FCPA prohibits corruptly offering anything of value to foreign officials to obtain business, and also requires strict internal accounting controls to prevent concealment of bribery.

4.2.4 Never Engage in Insider Trading

Directors, officers, and employees must comply fully with securities laws with respect to "insider" trading — trading in Company securities on the basis of "material" corporate information that has not been disclosed to the public. Failure to comply can result in substantial civil and criminal penalties. Insider trading generally involves buying or selling securities while in possession of material information not available to the public. It is also against the insider trading laws to tip another person regarding material non-public information to enable that person to trade in Company securities. Material information may include financial and key business data; merger, acquisition, or divestiture discussions; award or cancellation of a major contract; changes in key management; forecasts of unanticipated financial results; and other similar information. See the Company's Inside Information and Trading in Securities Policy for more information. Questions about insider trading and compliance with these laws should be referred to the General Counsel.

Substantial civil and criminal penalties can result

4.2.5 Abide by Antitrust Laws

The Company competes fairly and honestly and not through unethical or illegal business practices in restraint of trade which may reduce competition. We abide by applicable antitrust laws whenever we form alliances or teams, and wherever we do business. We prohibit entering into agreements with competitors to fix or control prices; to boycott specified suppliers or customers; to allocate customers or territories; to limit production or sale of products or product lines for anticompetitive purposes, or other anticompetitive

behavior. Employees involved in any dealings with competitors should never engage in anticompetitive discussions, or if approached by anyone to enter such discussions, must report the matter to the General Counsel. Any business arrangement with a competitor must be reviewed and approved by the General Counsel to ensure legal compliance with antitrust laws.

4.2.6 Avoid Foreign Economic Boycotts

U.S. corporations and their foreign subsidiaries are generally prohibited by U.S. law from complying with customer requests or foreign government policies supporting restrictive trade practices, including boycotts against specified countries such as Israel or against U.S. organizations or persons. Any request to refuse to deal with potential or actual customers or suppliers, or otherwise participate in a boycott, or provide information related to a boycott request, must be reported to the General Counsel.

4.2.7 Observe Import/Export Laws and Requirements

Company products, services and technology are often subject to trade restrictions and export/import controls when provided to foreign nationals or shipped or transmitted outside/inside the United States. Exercise care to comply with such controls and to assure compliance with applicable legal requirements. U.S. export laws and regulations, including the



International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR), require U.S. Government approvals for international transfers of certain technical data, equipment, or technology. Exporting such items without proper authorization to “non-U.S. persons” as defined by the regulations may have severe business consequences. Imports, too, are strictly controlled and are subject to additional regulations and procedures. The export licensing and controls area, as well as rules pertaining to the import of goods and services, are quite complex. Consultation with Company experts on contracts, the Office of General Counsel, and other functions may be necessary to ensure export compliance prior to negotiating any foreign transaction to avoid even inadvertent violations.

Import/Export laws are complex – seek appropriate guidance

4.3 Engage Only in Lawful and Authorized Political Activity

Voluntary involvement of employees in the political process is encouraged by the Company, but participation must be on an employee’s own time, at the employee’s expense. Company contributions or expenditures on behalf of any candidate or political party are made in full compliance with relevant laws and regulations. Company policy provides a lawful approval process for any political expenditure made on the Company’s behalf.

4.4 Approvals, Changes or Waivers to the Code

Where the Code requires you to first obtain written approval before taking action, you should seek that approval from your manager. Your manager will then determine what levels of approval may be required in a particular situation. Changes to or waivers from the Code for any Director or executive officer may be made only by the Board of Directors, and will be promptly disclosed as required by law or stock exchange regulation. Waivers of any Code provision with regard to all other employees must be approved in advance in writing by the employee’s manager and the Chief Compliance Officer, in consultation with the General Counsel and appropriate executive management.

5 *Be Responsible*

5.1 *Protect Intellectual Property and Proprietary Information*

Our and our customers' ideas and inventions, our innovative customer solutions, and other proprietary information, are among the Company's and our customers' most important assets and must be safeguarded. We have an obligation to maintain the confidentiality of such proprietary information. This obligation continues even after leaving employment of the Company. The Company and our customers' patents and other trade secrets, as well as classified government information entrusted to us, must be protected. You may access only files or programs, whether electronic or hard copy, that you have permission to access. Review, duplication, dissemination, removal, damage or alteration of files, passwords, computer systems or programs, other proprietary information, or improper use



of information obtained, if unauthorized, is a violation of the Code. You may not disclose to a third party, or use for personal gain, the Company's or our customers' trade secrets or other confidential information relating to the Company, our customers or any of its activities, products, services or personnel. Examples of the Company's trade secrets include (but are not limited to): manufacturing or detail drawings; manufacturing and engineering processes, data and techniques; bills of materials; customer/supplier lists; price lists; market research; marketing strategies; non-public financial information; and personal employee information.

5.2 Use Company Assets Appropriately

The Company provides business tools, such as computers, internet access, telephones, and a wide variety of other equipment, to enable us to be productive contributors to the Company's success. Occasional, limited personal use of these tools or assets is permitted so long as it does not interfere with job performance or otherwise compromise the Company's interests.

Employees should not send, download, distribute or view information reasonably considered to be offensive, defamatory or disruptive to other employees. Communication which is considered sexually explicit, verbally abusive, defamatory, harassing, vulgar, obscene or threatening is prohibited and could result in disciplinary action or termination of employment. This includes but is not limited to sexually explicit messages, jokes and images, unwelcome propositions, and ethnic or racial slurs.

The Company has the right (to the full extent permitted by local law for legitimate business purposes), without further notice, to block, monitor, or examine your internet usage, e-mail, text messages, instant messages, and all other communications, documents, and images, created with, stored on, or which otherwise involve the use of Company equipment, which includes Company cell phones. Employees should not expect any right of privacy for any information created with, stored on or which otherwise involves the use of Company equipment (as far as permitted by local law). Except where prohibited by policy, agreement or law, limited personal use of e-mail and the internet is per-

Exercise good judgement in e-mail and Internet access

mitted but such use should never interfere with your job performance. You should never use the internet for purposes that could interfere with Company IT operations. Company e-mail and messaging systems are intended for business-related communications only, although incidental or limited personal use may be acceptable, unless otherwise allowed by local law. Personal telephone use is permitted; calls should be kept to a minimum and be made during lunch and break times. Certain employees have access to mobile phones and other telecommunication devices provided by Company; their use should be, as far as practicable, for business purposes only.

5.3 Report Any Illegal or Unethical Behavior

Observed potential illegal or unethical behavior believed to violate the Code of Conduct must be reported to a manager, to Human Resources, to the Chief Compliance Officer, or to the General Counsel. Reports of alleged misconduct will be investigated, and employee cooperation with internal investigations is required. Substantiated allegations are resolved through appropriate corrective action and/or discipline. Retaliation is prohibited for reports of alleged misconduct made in good faith. Directors, officers, and employees are also expected to proactively seek advice from management, the Chief Compliance Officer, or the General Counsel to determine the best course of action when in doubt about how to respond ethically in a particular situation.



6

Contacting the Chief Compliance Officer or HelpLine

The Office of Ethics & Compliance is dedicated to giving employees the support and advice they need to act according to the Code. Employees are encouraged first to contact their manager or local Human Resources representative to resolve concerns, report potential violations of policy or the Code, or to get advice on ethics-related issues. You can reach the Chief Compliance Officer at **623-300-7057** or *Ethics-Compliance@bench.com*

The Office of Ethics & Compliance also has a HelpLine for those wishing to raise a concern, to report alleged misconduct or violation of the Code, Company policy, government law or regulation, or to seek advice.

Outside the United States:	+1-979-331-1315
Inside the United States:	979-331-1315
Internal VOIP:	775-1315

Reports will be investigated, and if substantiated, resolved through appropriate corrective action. Those found to have violated the Code will be subject to disciplinary action, including termination of employment. If you choose to identify yourself when making a report, you will be provided feedback when the Chief Compliance Officer has completed the review. For those who wish to report a concern or alleged violation in confidence, confidentiality

will be maintained to the extent possible, although limited disclosure may be necessary in some cases to effectively conduct an investigation or where compelled by applicable law. Employees are required to cooperate in internal investigations.

Retaliation against an employee for filing an ethics complaint is a violation of the Company's policy of non-retaliation and protection of those reporting concerns.



7 *My Pledge*

I have read, understood and received a copy of the Benchmark Code of Conduct (the “Code”). My signature below confirms my pledge to comply with the Code in my everyday work activities and to observe the policies and procedures in the Code.

Name (please print)

City

State/Province

Zip/postal code

Country

Signature

Date: _____ / _____ / _____

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For further information on specific policies for the Company's functional areas and subsidiaries, please visit the Company's intranet, or ask your manager or Human Resources representative for assistance. Following this publication, the Company may periodically modify or amend the Code. The most recent version is available on www.bench.com, or you may obtain a copy from your manager or Human Resources representative.

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Internal VOIP: **775-1315**

Office of Ethics & Compliance

Chief Compliance Officer: **632-300-7057**

Contact by e-mail: **Ethics-Compliance@bench.com**

Be the best