

1 Scope and Purpose

The purpose of this Whistleblower Policy is to reinforce the business integrity of the Company by providing a safe and reliable means for employees, officers and directors (collectively “Employees”) to report concerns they may have about specific conduct at Company and to ensure employee awareness of whistleblower protections provided to all employees.

Benchmark Electronics, Inc. and its subsidiaries (collectively, the “Company”) established a Code of Conduct which requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As Company Employees, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. By following this Policy, you can raise concerns, confidentially and anonymously if desired, and free of any retaliation, discrimination, or harassment.

Whether you are an employee, officer or director, we ask that you bring to light good faith concerns regarding the Company's business practices. We ask that you follow this Policy to report good faith concerns regarding any of the following:

- Suspected violations of our Code of Conduct.
- Suspected violations of any other Company policies or procedures.
- Questionable accounting, fraudulent auditing and accounting activities, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information.
- Suspected violations of law or fraudulent activities.

If requested, we also ask that you provide truthful information in connection with an inquiry or investigation by a court, an agency, law enforcement, or any other governmental body.

2 References

10 U.S.C. 2409 et seq, the National Defense Authorization Act
California Labor Code Section 1102.5

Sarbanes-Oxley Act of 2002, Section 806: Protection for Employees of Publicly Traded Companies Who Provide Evidence of Fraud.

3 Definitions

Report: The initial communication to Company authorities of activities which might be illegal, violate company policy, or both.

4 Policy

4.1 General Whistleblower Protections

The Company's Whistleblower Policy encourages all Employees to make a Report, provide information to and assist the Company in investigating any conduct by any employee of the Company that the person furnishing such information reasonably believes would constitute:

- Suspected violations of our Code of Conduct.
- Suspected violations of any other Company policies or procedures.
- Questionable accounting, fraudulent auditing and accounting activities, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information.
- Suspected violations of law or fraudulent activities.

Employees may also submit confidentially anonymous concerns regarding these concerns as provided below.

Employees who make Complaints, lawfully provide information to the Company or assist the Company in an investigation regarding any conduct that the employee reasonably believes constitutes a securities law violation or fraud against the Company's shareholders will, at their request, remain anonymous and will not be the subject of any retaliation for furnishing such information.

This policy provides a mechanism for the Company to be made aware of any alleged wrongdoings and address them as soon as possible. However, nothing in this Policy is intended to prevent any Employee from reporting information to federal or state law enforcement agencies when an Employee has reasonable cause to believe that the violation or noncompliance of a federal or state statute or regulation has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a Report directly to Company through the ethics or reporting hotline or any other reporting method specified in this Policy.

4.2 No Retaliation

No Employee will be terminated or otherwise retaliated against for properly submitting a Report under this procedure if the employee acts lawfully and reasonably believes that the Report involves a violation of the Company Code of Conduct, policies or procedure, or questionable accounting, auditing or financial matters, or the reporting of fraudulent financial information, or suspected violations of federal securities or anti-fraud laws. Any retaliation, including but not limited to intimidation, coercion, threats, discipline, change of work assignments, or harassment or discrimination resulting from an individual's making a complaint under Benchmark's policies or cooperating in an

investigation of a complaint of harassment or discrimination, is a serious violation of this policy. Such conduct will itself give rise to appropriate corrective action up to and including termination of employment.

If you have been subject to any conduct that you believe constitutes retaliation for having made a Report in compliance with this Policy or for having participated in any investigation relating to an alleged violation or fraudulent auditing and accounting activity, please immediately report the alleged retaliation to the General Counsel, or Chief Compliance Officer. If, for any reason, you do not feel comfortable discussing the alleged retaliation with these people, please report the alleged retaliation through the Company's Ethics and Compliance HelpLine (information provided below), and an investigation will be conducted in a timely fashion.

5 Procedure

Employees may report suspected misconduct by any of the methods set forth below:

5.1 Management

Employees may report any issues / concerns to their manager, supervisor or Human Resources.

5.2 Helpline

Reports can be made by phone to the Company's Ethics and Compliance HelpLine at the toll-free number for each country listed below or online at www.bench.ethicspoint.com:

Malaysia	1-800-81-8886
Mexico	001-844-360-8462
Netherlands	08004080001
People's Republic of China	4008423482
Republic of Singapore	800-110-2302
Romania	800400991
Thailand	1800-011-770
USA	1-844-689-1742

You may make a report without disclosing your name or contact information if you desire to remain anonymous.

5.3 Web Reporting

Reports may be submitted online at www.bench.ethicspoint.com. You may make a report without disclosing your name or contact information if you desire to remain anonymous.

5.4 Mail

If you do not believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, complaints may be made directly to the Chairman of the Company's Audit Committee at the following address:

Benchmark Electronics, Inc.
56 S. Rockford Dr.
Tempe, AZ 85281
Attn: Chairman of the Audit Committee

5.5 E-mail

Reports may be made by email to Ethics-Compliance@bench.com

5.6 California Employees

The State of California encourages employees to notify an appropriate government or law enforcement agency, person with authority over the employee, or another employee with authority to investigate, discover, or correct the violation or noncompliance, and to provide information to and testify before a public body conducting an investigation, hearing or inquiry, when they have reason to believe their employer is violating a state or federal statute, or violating or not complying with a local, state or federal rule or regulation.

Pursuant to California Labor Code Section 1102.5, employees are the protected class of individuals. For purposed of this section, "Employee" means any person employed by an employer, private or public, including, but not limited to, individuals employed by the state or any subdivision thereof, any county, city, city and county, including any charter city or county, and any school district, community college district, municipal or public corporation, political subdivision, or the University of California. See, California Labor Code Section 1106.

What is a whistleblower under California law? A "whistleblower" is a California employee who discloses information to a government or law enforcement agency, person with authority over the employee, or to another employee with authority to investigate, discover, or correct the violation or noncompliance, or who provides information to or testifies before a public body conducting an investigation, hearing or inquiry, where the employee has reasonable cause to believe that the information discloses:

- Violation of a state or federal statute
- Violation or noncompliance with a local, state or federal rule or regulation
- Unsafe working conditions or work practices in the employee's employment or place of employment that endanger employee safety or health

A whistleblower can also be a California employee who refuses to participate in an activity that would result in a violation of a state or federal statute, or a violation of or noncompliance with a local, state or federal rule or regulation.

What protections are afforded to California whistleblowers?

- An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from being a whistleblower.
- An employer may not retaliate against an employee who is a whistleblower.
- An employer may not retaliate against an employee for refusing to participate in an activity that would result in a violation of a state or federal statute, or a violation or noncompliance with a state or federal rule or regulation.
- An employer may not retaliate against an employee for having exercised his or her rights as a whistleblower in any former employment.

California Employee Hotline: 1-800-952-5225 - California State Attorney General

5.7 Federal Protection

The National Defense Authorization Act, 10 U.S.C. 2409(a)(1), provides whistleblower rights and protection for employees working on a Federal Government contract. Generally, an employee may not be discharged, demoted or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of the following misconduct:

- Gross mismanagement of a Federal contract or grant
- Gross waste of Federal funds
- Abuse of authority relating to a Federal Contract or grant
- Violation of law, rule, or regulations related to a Federal contract (including the competition for or a negotiation of a contract or grant.
- A substantial and specific danger to public health or safety

It is important that you understand the prohibited personnel practices and protections available to you including retaliation for whistleblowing. Any person who believes that they have been subjected to a reprisal prohibited by this Act may submit a complaint to the Inspector General of the U.S. Department of Defense. Procedures for submitting fraud, waste, abuse and whistleblower complaints are generally accessible on the Office of Inspector General Hotline or Whistleblower Internet sites.

Mail: Department of Defense Office of Inspector General
Attn: DoD Hotline
THE PENTAGON
Washington, D.C. 20301-1900
Hotline: 1-800-424-9098

Online: <https://www.dodig.mil/Components/Administrative-Investigations/Whistleblower-Reprisal-Investigations/Whistleblower-Reprisal/>

The Corporate Legal Department is responsible for the administration of this policy. All employees are responsible for consulting and complying with the most current version of this policy. If you have any questions regarding this policy or concerning the scope or delegation of authority, please contact the Corporate Legal Department at legal@bench.com

This policy may be amended or terminated at any time with or without notice.

Revision History

Date	Rev	Reason for Change:	ECO Number:
06/15/2023	D	Update various types of Reports; change "Complaint" to "Report"; move retaliation into new section. Title changed from policy and procedure to policy.	DCO0000043
4/30/2019	C	Correct typographical errors in section 4.1.	CORP004189
4/15/2019	B	Update to include California and Federal requirements.	CORP004182
1/4/2018	A	Update document template, Change to audit committee chairman number and Helpline information. Was CPA-049.	CORP003973