

SIGMATRON INTERNATIONAL, INC.
CODE OF ETHICS FOR SENIOR FINANCIAL MANAGEMENT

SigmaTron International, Inc. (“SigmaTron”) has adopted this Code of Ethics for Senior Financial Management (“Code of Ethics”) to promote (1) honest and ethical conduct by the members of the Senior Financial Management, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; (2) full, fair, accurate, timely, and understandable disclosure in reports and documents that SigmaTron files with, or submits to, the Securities and Exchange Commission (the “SEC”) and in other public communications made by SigmaTron, any of its subsidiaries and foreign branches (the “Company”); (3) compliance with other applicable governmental laws, rules, and regulations; (4) the prompt internal reporting of any violations of this Code of Ethics to the Board of Directors and legal counsel of SigmaTron; and (5) accountability for adherence to this Code of Ethics. This Code of Ethics applies to SigmaTron’s principal executive officer, principal financial officer, principal accounting officer or controller, and other employees of the Company performing similar senior financial management functions (the “Senior Financial Management”). The obligations of this Code of Ethics supplement, but do not replace, any other code of conduct or ethics policy applicable to employees of the Company generally.

Any person who has information concerning any violation of this Code of Ethics by any member of the Senior Financial Management shall promptly bring such information to the attention of SigmaTron’s Corporate Counsel or Chairman of SigmaTron’s Audit Committee. If the Corporate Counsel or Chairman of SigmaTron’s Audit Committee determines that a conflict of interest exists, he or she will refer the matter to the Audit Committee of SigmaTron’s Board of Directors for resolution. Violations of this Code of Ethics may subject the member to appropriate actions, such as censure, suspension or termination. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code of Ethics. The Audit Committee of SigmaTron’s Board of Directors shall consider any request for a waiver of this Code of Ethics and any amendments to this Code of Ethics and all such waivers or amendments shall be disclosed promptly as required by law or SEC regulation.

The Company fully expects the members of Senior Financial Management to practice the highest standards of business conduct in every business relationship – with each other, with the Company, and with the Company’s customers, business partners and competitors.

All members of the Senior Financial Management shall:

- Act honestly and ethically in the performance of their duties at the Company.
- Avoid situations which do, or which appear to, present conflicts of interest between personal interests and the best interest of the Company.

- Provide full, fair, accurate, timely, and understandable disclosure in reports and documents that SigmaTron files with, or submits to, the SEC and in other public communications by the Company.
- Comply with rules and regulations of federal, state and local governments and other private and public regulatory agencies that affect the conduct of the Company's business and the Company's financial reporting.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing the member's independent judgment to be subordinated.
- Respect the confidentiality of information acquired in the course of work, except when authorized or legally obligated to disclose such information.
- Promote ethical behavior as a responsible partner among peers and colleagues in the work environment and community.
- Achieve responsible use of and control over all assets and resources of the Company entrusted to the member.
- Promptly bring to the attention of the Corporate Counsel or Chairman of SigmaTron's Audit Committee any information concerning (1) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (2) any fraud, whether or not material, that involves the Company's financial reporting disclosures or internal controls.

Each member of the Company's Senior Financial Management shall acknowledge annually receipt of and agreement to this Code of Ethics.

THE BOARD OF DIRECTORS

Posted: March 9, 2023