

## GTK Code of Business Conduct

At GTK we accept our social responsibility for good corporate citizenship. We aim to positively influence the attitudes and behaviour of our key stakeholders, particularly our employees, suppliers and business partners.

We consider that our key corporate social responsibility issues are to:

- Employ and retain people of ability and integrity
- Engage our employees, customers and suppliers to promote sustainable living
- Deal fairly with our employees, customers and suppliers and sell responsibly sourced, quality products and services
- Manage and monitor risk throughout the business.

In order to positively influence key stakeholders' behaviour we:

- Communicate and implement our policy throughout GTK by effective staff induction and training, and enforcing adherence to our employee handbook
- Support the protection and promotion of basic human rights, respecting individual diversity
- Fully comply with all local and national laws regarding minimum age of employment, working hours and restrictions on juvenile employment. All wages and benefits will meet or exceed the minimum national requirements or, in the absence of law, industry benchmark standards
- Endeavour to safeguard workers from exploitation, hazard and long-term damage to health. We will protect the health, safety and welfare of all our employees. Working conditions will be safe and hygienic with adequate assessments and steps taken to ensure and maintain such an environment
- Make employees aware of their employment rights. Required legislation along with company policies and procedures will be appropriately communicated across the business
- Expect all our suppliers to comply with their equivalent local legal obligations.

### Quality and environmental

GTK is committed to meeting or exceeding customer expectations by providing safe high quality products and services. We recognise that in conducting our business we can adversely affect the environment in which we and our neighbours live, and we are committed to continually improve the impact we have on the environment and prevent pollution by minimising waste, maximising recycling and reuse, and responding and adapting to climate change.

We seek to continually improve the effectiveness of our system and to maintain a robust framework for establishing and reviewing quality and environmental objectives, whilst ensuring compliance with all relevant laws and regulations that relate to environmental aspects. Our integrated management systems comply with the requirements of our independent accreditations and include the following core processes: Enquiry, Production Engineering, Sales, Purchasing, Production and Despatch.

**ISO 9001 and ISO 14001:** the company's scope of operations is defined as "the manufacture of cable assemblies and box build. The supply of connectors, cable assemblies, displays, mechatronics and associated components".

**AS9100:** AS9100 applies to GTK's UK manufacturing in Basingstoke: the company's scope of operations is defined as "the manufacture of cable assemblies and box build".

## **Foreign Object Damage or Debris (FOD)**

GTK's Foreign Object Damage or Debris policy is an important part of our integrated management system in terms of both safety and quality.

GTK follows these key simple rules implemented to prevent FOD:

1. Assemblies, fixtures and equipment are handled and stored appropriately as to prevent damage, deterioration or contamination
2. All workstations are free from foreign objects; (checks in place eg before starting a new job)
3. No food, or food consumption at workbenches or workstations

## **Conflict Minerals**

GTK is committed to ethical sourcing of minerals through our supply chain and to supporting our customers' compliance to regulations, including the SEC rule Dodd-Frank 1502 regarding the presence of tantalum, tin, tungsten and gold, by avoiding the use of conflict minerals in our products and by asking for a similar commitment from our suppliers.

## **Counterfeit product**

GTK recognises that counterfeiting is a serious issue that concerns our customers due to the potential impact on their products. We do not use, nor condone the use of, counterfeit products. We have a policy to prevent counterfeit products entering our supply chain by purchasing components directly from our approved suppliers, typically OEMs, franchised distributors, manufacturers or agents. This policy is enforced by procedures and controls in place in compliance with ISO9001 and ISO14001 standards.

## **Public communications**

GTK will seek to ensure that in all advertising and other public communications, untruths, concealment, misleading impressions and overstatement are avoided.

## **Bribes and facilitating payments**

GTK will not directly or indirectly (i.e. through a third party intermediary or subsidiary) offer, solicit or accept a reward or benefit which seeks to induce a person to do anything improper or illegal. We will not directly or indirectly pay facilitating payments to any officials in order to expedite the performance of duties that they are already bound to perform. We do not differentiate between facilitating or accelerating payments and bribes.

## **Conflicts of interest**

Employees must not, without prior written consent, have any direct or indirect interest in any supplier, customer or competitor of GTK that conflicts with the interests of GTK. Employees are expected to act solely for the benefit of GTK and not be influenced by a personal interest, which may result from other individual or business concerns.

## **Equal opportunities**

GTK recruits and promotes employees on the basis of their suitability for the job without discrimination on grounds of race, ethnic origin, religion, political or other opinion, nationality, colour, gender, age, sex, sexual preference, marital status, or disability unrelated to the task at hand. We train all staff to ensure they have the skills and knowledge to perform their individual tasks, and encourage personal and professional development.

We will not tolerate any sexual, physical or mental harassment of employees. We will seek to work in good faith with trade unions and other bodies our employees collectively choose to represent them within the appropriate legal framework.

## Modern slavery and human trafficking

GTK takes a long-term view of our social responsibility, actively engaging with our stakeholders and continually monitoring and managing our progress and performance. We review our business code of conduct regularly to ensure that it remains in line with core activities and objectives.

We are committed to ethically sourcing products and services, and to helping our customers' compliance to regulations. Whilst the Modern Slavery Act 2015 does not apply to GTK and its subsidiaries as our annual turnover falls below the threshold of £36 million, we conduct due diligence on all our suppliers and require them to comply with this code of conduct, by operating with ethical legal, environment and employment practices including the following commitments:

- Child labour: use of child labour is not permissible. Suppliers shall not employ anyone under the legal age as determined by the laws in the country where they conduct business. GTK will not do business with any suppliers who employ anyone under the legal age
- Forced labour: suppliers shall not use forced or prison labour. In addition suppliers should not engage or use suppliers or sub-contractors that force work to be performed by unpaid or underpaid workers who are labouring against their will
- Working hours: suppliers shall adhere to all applicable local laws and regulations with the respect to the number of hours and days worked. If no such law exists suppliers should ensure that workers are not required to work an excessive amount of hours in a standard working day and are given at least one day off in seven.

## The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023

GTK complies with all prevailing UK legislation and EU regulations including:

- The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023.and
- Council Regulation (EU) 2023/1214 of 23 June 2023 amending Regulation (EU) No 833/2014.

In addition, GTK does not trade in the affected areas.

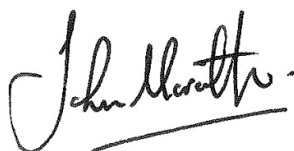
## Working environment

In accordance with GTK's Health and Safety Policy, we are committed to providing a safe and secure working environment in which all incidents of personal injury and occupational ill health are regarded as preventable.

We will ensure in all our activities and operations that employees, contractors and visitors are well informed and given appropriate training and guidance to enable them to carry out their tasks in a safe and competent manner, promoting and encouraging a healthy work-life balance for employees throughout the business.

## Volex plc

GTK is a wholly owned subsidiary of Volex plc. As a result we have aligned our policies with the spirit and intention of those of Volex plc however the policies of GTK remain in force and applicable to all employees, suppliers to GTK and business partners.



John Morath  
Managing Director

20<sup>th</sup> November 2023