GTK Code of Business Conduct

This Code sets out the basic principles that should be applied by all employees in all GTK Group companies, everywhere that we do business. Our Code is the foundation of our overall compliance regime and guides us on the parameters within which we should work and the processes we should follow. Although our Code can never provide detailed advice on all situations or contingencies, it sets a framework for how we should approach doing business.

Our economic activities should generate economic benefits and our conduct should be a source of positive influence for those whom our business impacts. We will pursue our business with integrity, respecting the different cultures and the dignity and rights of individuals in all countries in which we operate. The reputation of GTK and the trust and confidence of those with whom it deals are among our most vital assets. The protection of our reputation is of fundamental importance and is every employee's responsibility.

Responsibility for compliance

The ultimate responsibility for oversight of our Code of Conduct and the policies contained within it rests with the Board of Directors and our Senior Leadership Team.

1. Legal compliance

Our business methods will always be legal. We are committed to compliance with those laws, regulations and standards which apply to our business activities and any other laws with international reach, such as the UK Bribery Act, where relevant.

2. Business dealings

We expect all our employees to conduct their business dealings with honesty, openness, fairness and courtesy and expect the same of all those with whom we do business.

3. Commitment to employees

We will respect the rights and dignity of all our employees. We are committed to creating a challenging environment of empowerment and continuous learning, generating both a common sense of purpose and pride in working for GTK. We aim to establish clear values and objectives so that all employees understand and are committed to the aims of the company and see their role within it. We will seek to realise the potential of employees, recognise individual and team contributions and reward competitively relative to our success.

4. Equal opportunities

We will recruit and promote 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 will not tolerate any sexual, physical or mental harassment of employees and will not employ child labour. 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.

5. 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 do not tolerate the use, possession or distribution of illegal drugs, or our people reporting for work under the influence of drugs or alcohol.

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.

6. Modern slavery and human trafficking

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business or at any point in our supply chains, and ask for similar commitments from our own suppliers.

7. Conflict minerals

We are committed to avoiding the use of any conflict minerals in our products, and ask for similar commitments from our suppliers, to ensure that any tantalum, tin, tungsten or gold in the products we manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.

8. Relationships with business partners

We will seek to establish productive relationships with suppliers and business partners, conducting our activities with integrity. We encourage all suppliers to commit to certain basic legal and ethical principles, similar to those included in this code.

9. Relationships with customers

We will be driven by the needs of our customers and will provide them with innovative, value-for money solutions driven by local market needs and supported by our global experience and technology, setting the standard for the markets in each country in which we operate, with a focus on consistent quality, reliability of service and the best customer offering.

10. Relationships with communities

We will operate as a responsible member of the local, national and global communities of which we are a part, exercising a high level of care and sensitivity towards the environment.

We are committed to reducing waste and conserving energy, and to exploring opportunities for reuse and recycling. We will strive to ensure that those countries and communities in which we operate benefit from our presence and to minimise any adverse effects our activities may have on the environment.

11. Community activities

We will encourage and support the efforts of our employees to give leadership and service in the governmental, educational and social fabric of communities in which they live.

12. Public communications

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

13. Gifts and entertainment

Gifts or favours must never be solicited by GTK employees. Gifts of money will never be accepted. Reasonable hospitality and small tokens may be given or accepted provided they are not of significant value, do not place the recipient under any obligation, are not recurring or systematic, are not capable of being misconstrued, and could be reciprocated at the same level.

Any offer of a gift or service of unusual size or questionable purpose must be reported immediately to your line manager. If employees are offered hospitality which is unduly frequent or which could be considered extravagant, the approval of senior local management must be sought before accepting the offer. All expenditure on gifts and entertaining must be properly authorised and accounted for.

14. Bribes and facilitating payments

We 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 which they are already bound to perform. GTK does not differentiate between facilitating or accelerating payments and bribes.

15. Misuse of company property

We will ensure that GTK's property and employees' time are solely used for GTK's legitimate business and not for personal gain. Employees are responsible for the protection of all GTK property and for taking reasonable steps to prevent its theft or misuse.

16. Conflicts of interest

Employees must not, without prior written consent, have any direct or indirect interest in any supplier, customer or competitor of GTK which conflicts with the best 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.

17. Business information

Employees will only use information received in the course of business dealings for the purpose for which it is intended or normally used and never for personal gain. GTK and its employees will respect the confidentiality of all information provided to any group company on that basis.

18. Political contributions

Any political contribution by any GTK entity must be approved by the GTK's Board of Directors before it is paid. Subsidiaries of GTK that wish to make political contributions must first seek local legal advice to confirm that such contributions are proper.

19. Speaking up

Employees who know (or have genuine suspicions) of any breaches of this Code of Business Conduct or any legal or regulatory or other violation in relation to work-related issues should report such matters promptly to their manager.

We recognise that in certain circumstances it may not be possible or appropriate to do this. In these instances, we encourage our employees to use the company's whistleblowing channels.

Employees will not be blamed for speaking up or for failure to speak up earlier, and GTK will make all proper efforts to protect the confidentiality of employees who do raise concerns. Any attempt to deter employees from raising concerns will be treated as a serious disciplinary offence.

20. Sanctions and export control compliance

We will comply with all sanctions and export controls relevant to our global operations. Employees must not undertake any activities prohibited by UN, EU, US and UK sanctions or export controls, or any other sanctions or export control regimes which apply where we conduct our business and must not seek to circumvent these measures.

21. Prevention of the Faciliation of Tax Evasion.

We are committed to the prevention, deterrence and detection of facilitation of tax evasion across the Volex Group, and, as a UK plc, we must comply with certain obligations under the UK Criminal Finances Act 2017. All employees must comply with the 'Failure to Prevent the Facilitation of Tax Evasion' Policy at all times, and ensure that any concerns or suspicions are raised in accordance with the Policy.

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.



Scott Ford
Managing Director
9th September 2026