

Filtronic plc

Supplier Code of Conduct (“Supplier Code”)

Policy Statement

This Supplier Code is relevant to all suppliers of Filtronic plc and its subsidiaries and affiliates. For the avoidance of doubt, suppliers include contractors, subcontractors, agents, distributors, reps, consultants and advisors and any other similar relationships.

The overarching document between both parties is the contractual agreement but this Supplier Code should serve as a supplementary document. The Filtronic Supplier Code serves as a guide for compliance by the Filtronic supply chain with a set of established principles of actions and values. These principles and policies define who we are, how we work, and what we stand for. They also tell us what we expect of ourselves and all who work with us in our supply chain. In summary, at Filtronic we believe in doing the right thing above all else and we expect our suppliers to do the same.

Our Supplier Code

We expect our suppliers to work to a standard which is equivalent to, and at least as high as, the standard that we, ourselves, operate to. Suppliers must comply with all applicable laws and regulations and require all its employees to conduct business in accordance with the law.

Filtronic has established an enviable brand reputation and has worked over decades to establish it. Our reputation for acting lawfully and with integrity is crucial to us and our Supplier Code along with the supporting Group Policies, found on the Filtronic website at www.filtronic.com/about/group-policies/ are designed to ensure we preserve it. Suppliers and partners should not do anything to undermine or circumvent these standards or diminish our customers confidence. Therefore, it is recommended that suppliers also read the Filtronic Group Policies which cover the topics below in more detail.

The objective of this document is to provide an overview of the areas suppliers must be compliant with and to:

- 1) Establish guidelines for action and behaviours;
- 2) Define a reference framework of mandatory compliance; and
- 3) Create rules of conduct for stakeholders that are related in any way to Filtronic.

Any supplier who does not comply with these standards, laws and regulations will have appropriate action taken against them and/or the employing company. Should any proven breach of the Supplier Code be criminal, we will support the appropriate authorities in their prosecutions of those involved. Customs or local practices never take precedence over legal requirements. If you find that our Supplier Code is in conflict with applicable legal requirements, you should inform the relevant Filtronic manager as soon as possible.

Our mission

Our mission is to ensure we are **creating value for our clients through technology leadership.**

We have over 40 years of designing and manufacturing high performance, customised solutions for the critical communication sectors.

Procurement – selecting the right supplier

We work with colleagues to assess the needs of the business and the requirements for selection. This rigorous process allows Filtronic to remain impartial, fair, and transparent to all involved.

Audit

Filtronic reserves the right to monitor and audit each supplier's compliance with our Supplier Code. Accordingly, you must cooperate by providing relevant information that we request, and by making individuals accessible so Filtronic can conduct a meaningful audit. Similarly, you are required to evaluate your supply chain to ensure compliance with our Supplier Code. Any non-compliance by you or your supply chain must be effectively remedied both in a timely manner and at no additional cost to us or our customers. Breaches of the Supplier Code may negatively impact your business relationship with Filtronic. Potential consequences may include but are not limited to contract termination.

Our Policies

We expect all suppliers to adhere to all of the following legislative and best practice requirements.

a) Anti-bribery and corruption

One of our core values is acting with integrity in everything we do. To achieve this, we are committed to promoting and maintaining the highest level of ethical standards in relation to how we do business. Filtronic has a zero-tolerance policy towards bribery and corruption, and we are committed to implementing and enforcing effective systems to counter them. We require everyone who works with us, to act honestly and with integrity at all times. We will not tolerate anyone associated with us to be involved in any level of bribery or corruption.

Suppliers should ensure that:

- All activities are conducted openly with fairness and honesty.
- Anyone working with us will not engage in any illegal or improper act.
- All suppliers working with us maintain similar anti-bribery policies.
- No persons acting on behalf of Filtronic shall receive, offer, promise, improperly influence payment, authorise payments or awards in return for personal gain.
- If anyone suspects that bribery is taking place, they should report it in line with the reporting of misconduct section at the end of this Supplier Code.

b) Anti-tax evasion

It is our policy to conduct all of our business in an honest and ethical manner. We have a zero-tolerance approach to all forms of tax evasion, whether under UK law or the law of any foreign country and are committed to implementing and enforcing effective systems to counter tax evasion facilitation. We expect our suppliers to comply with all applicable laws, regulations, codes and sanctions relating to the prevention of tax evasion facilitation including the Criminal Finances Act 2017. In performing its obligations under any contractual agreement, the supplier shall:

- Comply with the legislative and best practice requirements and have and maintain its own procedures to ensure its compliance and to reasonably prevent the facilitation of tax evasion.

- Not engage in any activity or conduct which would constitute a UK or foreign tax evasion facilitation offence under section 45(1) or 46(1) of the Criminal Finances Act 2017.
- Report any breaches or suspected breaches to your senior contact within Filtronic or an Executive Director.

c) **Human Rights and fair working conditions**

We are committed to acting ethically and with integrity in all our business dealings. Therefore, we support recognised global human rights and fair working conditions for persons working with Filtronic.

Modern slavery is a criminal offence and can happen in various forms, including slavery, servitude, **human trafficking and forced labour**, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal gain.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or on our behalf.

We expect our suppliers to comply with all **conflict mineral** laws and regulations regarding the sourcing and trading of minerals from conflict-affected and high-risk areas. Suppliers should establish policies and processes to reasonably assure themselves that any of the products, components, parts or materials supplied contain minerals (tin, tantalum, gold and tungsten) originating from conflict regions.

Suppliers must observe **minimum wage requirements**:

- Anyone working in the UK over the age of 25, now receives the National Living Wage as a minimum. Anyone working in the UK under the age of 25 receives the appropriate Minimum wage (according to age bracket) as a minimum.
- Any workers not based in the UK are being paid no less than the minimum wage as set out by the respective government.

More information can be found on the UK Government website (www.gov.uk).

We require our suppliers:

- To ensure that working conditions, hours, wages and benefits comply with applicable national and local laws and relevant UN's International Labour Organization (ILO), conventions.
- To abide by minimum wage requirements for their respective government.
- To state their awareness of the Modern Slavery Act 2015, compliance with it and mitigate any risk specific to it.
- To have a zero-tolerance approach to any form of human trafficking or **child labour**, including such practices as the unlawful or illegitimate withholding of wages. A child is anyone below the age of 15, or below any higher minimum age specified by local law.
- To not allow any practice that would restrict free movement of employees. Such practices can include requiring employees to hand over identification documents, passports or work permits as a condition of employment.
- State whether they have previously been involved in any human trafficking, debt bondage and other acts of employee exploitation.
- To confirm they do not source or trade minerals from conflict-affected areas.

d) Equal Opportunities and Diversity

We believe that happy and contented staff do great work. To ensure a safe, supportive, and co-operative working environment, it is important that:

- An inclusive culture is embraced and promoted.
- Equal opportunities for all employees and potential employees irrespective of ethnic origin, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, gender or age are promoted
- Everyone respects the personal dignity, privacy and rights of each individual
- No-one in our supply chain tolerates any unacceptable treatment of employees, such as mental cruelty, bullying, harassment, unwanted sexual advances or **discrimination**.

e) Competition compliance

Filtronic is committed to conducting its business activities in a fair and open manner at all times and in compliance with all applicable competition laws, rules and regulations and expects the same conduct from its supply chain.

Suppliers must not make any formal or informal agreements or formal or informal discussions with competitors regarding prices or pricing policies, allocating customers, supplier or customer selection or classifications, or allocating markets or territories in which competitive products are sold, customer or supplier boycotts, excluding competitors from the marketplace, or unfairly restricting trade or any other similar competitive information.

f) Health & Safety

Filtronic are committed to providing a place of work free from harm, by preventing injury and ill health, where everyone goes home safe every day. The safety of our employees and partners comes first. We do everything safely and responsibly, or not at all. Filtronic implements robust occupational health and safety management systems, adopting best practices and engaging in continuous improvement.

We expect our suppliers to follow suit and provide a safe, healthy and secure working environment for their employees, contractors, customers and anyone who may be affected by their activities.

g) Environmental

Filtronic takes its environmental responsibilities seriously and has worked hard to demonstrate and implement this commitment into our management system with ISO14001 accreditation. Filtronic is aware of the importance of safeguarding the environment by limiting any adverse impacts on the community, environment and natural resources whilst protecting the health and safety of the public.

Therefore, we expect our suppliers to comply with all applicable environmental laws and regulations and to conduct business in a manner that actively manages environmental risks.

In situations where suppliers have breached and/or have been prosecuted under these laws and regulations, it must be disclosed to Filtronic during the onboarding process. If a supplier breaches or is prosecuted whilst being an active supplier of Filtronic, we expect this to be brought to our attention in a timely manner.

Suppliers are expected to take immediate action to remedy any non-compliance or where feedback has been provided by Filtronic for improvement.

h) Data Protection and Information Security

It's vital to Filtronic that its suppliers ensure that all sensitive data and information (including the assets and equipment on which it is processed and stored) is appropriately protected.

Any sensitive or personal information that could be shared to fulfil any contractual requirements must be processed in accordance with the General Data Protection Regulations ("GDPR"). Contractors and suppliers, including Cloud service providers, that have access to Filtronic information/data are required to have policies and procedures in place for information security that are the same or more comprehensive than Filtronic.

All data should:

- Be accurate and not changed in any way.
- Be used specifically for its intended use and nothing else.
- Not be passed onto any employee or representative who is not directly involved with the associated work (unless granted permission).
- Be handled according to data protection rights (where personal data is involved).
- Be kept safe and secure at all times, with help from recognised standards of IT security.
- Be handled to ensure compliance with the obligations under the GDPR with respect to breach notifications, impact assessments and consultations with supervisory authorities or regulators.

If you require further information on this, you can contact the Filtronic Security Controller or the IT Manager at ithelp@filtronic.com. The supplier must also notify Filtronic, at this address, immediately when they become aware of a Personal Data Breach as well as informing the Chief Operating Officer.

i) Protection of Filtronic assets, property and equipment

We safeguard and protect our assets from damage, theft, loss and misuse, as they are essential to our business. Assets are either tangible or intangible.

Examples of tangible assets are raw materials, products, machines and equipment, tooling and computers.

Examples of intangible assets are our brand, patents, trademarks, know-how, trade secrets and copyrights.

It is important to ensure that:

- You respect the assets of Filtronic and our stakeholders.
- You only use assets belonging to Filtronic and others as and when appropriately authorised.
- Theft of assets including Intellectual Property Rights (IPR) and know-how is not tolerated.
- Information relating to Filtronic, its products or commercial dealings are kept confidential.
- Suppliers should not reference Filtronic without permission.

j) Declaration of Interest

Any personal connection to a person or group within the supply chain that could potentially lead to accusations of unfair practice. Our suppliers should avoid any relationship, influence or activity that might impair their ability to make fair and objective decisions when performing their job. If a supplier believes there is, or may be, an actual or perceived conflict of interest, we expect them to disclose it to Filtronic and all other affected parties, as soon as possible

It is recommended that Filtronic's Chief Operating Officer is regarded as the first point of contact should a declaration need to be made.

k) Export and trade compliance

Our suppliers must comply with all applicable laws and regulations concerning export licences and consents including imports in connection with any goods and services transactions for military, dual or commercial use. Suppliers are expected to understand any sanctions, import and export control requirements relating to their work, and ensure decisions and activities comply with those requirements.

l) Counterfeit parts

Our suppliers should use the best quality goods, materials, standards and techniques, and ensure that all goods and materials supplied, used or transferred to the Company will be free from defects in workmanship, installation and design, as well as free of second hand, counterfeit and/or replica parts.

m) Social Media

If used wrongly, social media can jeopardise the reputation of Filtronic and associated business partners.

It is important that:

- A specific person or company is not mentioned, tagged or added to a post that can be viewed by anyone, without prior permission.
- Any individual does not discuss or comment on any aspect of competitor activity, particularly in a negative manner.
- In the event that any negative comments are made by internet "trolls", individuals should not engage with any view expressed.
- Social media users should not fake their identity in order to respond to any comment made.
- The individual should not act in a disrespectful manner or express a comment that could be recorded and used against them or the employing company.
- If you are unsure about a post, or are aware of any negative information or comment, please contact Pennon's Communications Team.

Reporting Misconduct and Whistleblowing

We're committed to doing the right thing and upholding the law. A strong ethical culture depends in part upon creating an environment in which people feel free to report instances of non-compliance with our Supplier Code. Such non-compliance might include suspected illegal or unethical conduct (collectively called misconduct). We are committed to investigating reports of suspected or known misconduct and taking appropriate action.

If you become aware that a law has been broken or that any principles contained in this code have been broken, we encourage you to speak up.

In the first instance, it is recommended that Filtronic's Chief Operating Officer is regarded as the first point of contact for members of the supply chain, who are considering reporting misconduct. Alternatively, if you feel uncomfortable about raising concerns in this way, suppliers can follow the Whistleblowing Policy and email the confidential address found in the Whistleblowing Policy within www.filtronic.com/about/group-policies/.

**Approved by the Board of Filtronic plc
May 2022**