Human Rights Policy

Introduction

Volex plc and its subsidiaries (together, the "Group" or "Company") are committed to upholding the human rights of our workforce and of those who may be affected by our business. We understand and acknowledge the obligations placed on us as a UK-listed company under the UK's Modern Slavery Act 2015, Human Rights Act 1998 and the Equality Act 2010.

Volex plc is committed to the adoption of policies and practices that respect human rights in accordance with established international human rights principles including those enshrined within the United Nations Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Scope

This policy is applicable to all of our global operations including all subsidiaries in which we have a majority ownership. This policy covers all our employees (whether permanent, fixed-term, or temporary); officers; consultants; contractors; casual workers; agency workers; interns; volunteers; students; suppliers; visitors, customers and any third parties who provide services for or on behalf of Volex. In addition, any third party acting in good faith can raise a concern via our Speak Up reporting system.

Our Code of Business Conduct

Volex has established a Code of Business Conduct which sets out the basic principles that should be applied by all employees in all Volex Group companies, everywhere that we do business. This policy aligns to, and is supportive, of the commitments made within our Code of Business Conduct.

Metrics and Disclosures

Any employee, or any third party acting in good faith, can report their concerns through the Company's Speak Up reporting system. The Company operates a robust whistleblowing policy in accordance with international law. We disclose the number of cases raised each year within our Annual Report and Accounts.

Our Management Framework

In response to our international obligations:

1. We have assigned overall responsibility for this policy and for ensuring its effectiveness to our Board's Safety, Environmental and Sustainability Committee.
2. We have assigned Executive responsibility for this policy to our Group Sustainability Steering Committee;
3. Our Regional Leadership Teams ensure regional accountability for the delivery of these policy principles within their areas of responsibility.
4. Underpinning each of our policy principles are management controls, metrics and key performance indicators that are regularly reviewed by our management.
5. We require each of our sites to maintain certified management systems to a variety of ISO standards. Compliance with these management systems is ensured through an external audit process with independent assessments by companies such as TUV and Intertek.

Responsibility

Compliance with this policy will be overseen by the Board of Directors and will be monitored through our Safety, Environmental and Sustainability Committee.

Review of the policy

This policy will be reviewed at least annually.

Our Policy Principles

Principle 1 - Health and Safety

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. Our Health and Safety policy details the commitments we take to ensure the health and safety of our employees, contractors and visitors, and is available to view on our website.

Principle 2 - The working environment

The Group aims to provide a working environment where individual differences and contributions of staff are recognised and valued, and where all employees are treated with respect and dignity. We are committed to ensuring a working environment that is free from harassment, bullying, unlawful discrimination, and intimidation and one that ensures that employees understand that they have the right to raise concerns on such behaviour. Harassment and bullying are unacceptable behaviours and all employees are expected to comply with this policy, and conduct themselves at all times in a manner that does not conflict with their responsibilities under this policy. Employees are made aware of what constitutes harassment and bullying within our employee handbooks and through local training programmes. The Group is committed to taking seriously all complaints of bullying, harassment or unlawful discrimination, and such acts will be dealt with by taking the appropriate action. Any incidents of sexual harassment shall be appropriately escalated in accordance with legal obligations and upon consultation with the employee.

Principle 3 - Slavery and Human Trafficking

The Group is committed to the eradication of slavery and human trafficking. The Group adheres to the requirements of the Modern Slavery Act 2015 and has a zero-tolerance policy across its 28 locations and within its supply chain. This commitment is integrated into Volex plc's Code of Conduct and contractual agreements, requiring customers and suppliers to ensure compliance with group policies. Volex extends these standards to contractors and suppliers, verified through regular internal audits and external audits in China and Asia, ensuring alignment with local labor laws and the Responsible Business Alliance's Code of Conduct.

Principle 4 - Equality and diversity

Volex 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, color, gender, age, sexual preference, marital status, or disability unrelated to the task at hand. We oppose all forms of unlawful and unfair discrimination.The Group shall always promote equality, fairness and respect for all in our employment; and not unlawfully discriminate in accordance with the Equality Act 2010's protected characteristics. The Group aims to encourage equality, diversity and inclusion in the workplace.

Principle 5 - Labor Conditions

The Group is unequivocally committed to preventing child labour and forced labour in all its forms within our operations and supply chains. We adhere strictly to international standards, including the International Labour Organization's conventions on the minimum age for employment and the elimination of forced labor. The Group prohibits the employment of individuals below the 18 year of age and ensures that no one is subject to any form of forced, bonded, or compulsory labour. All work must be voluntary, and employees shall have the freedom to terminate their employment at any time. We expect the same commitment from our contractors, suppliers, and business partners, enforcing these standards through regular audits and compliance checks to uphold ethical labour practices globally.

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Principle 6 - Non-Discrimination and Equal Opportunity

The Group is dedicated to fostering an inclusive and diverse workplace where every individual is treated with dignity and respect. We strictly prohibit any form of discrimination based on race, color, age, gender, sexual orientation, ethnicity, religion, disability, or any other protected characteristic. This commitment to equality extends across all aspects of employment, including recruitment, hiring, training, promotion, and compensation. The Group shall ensure that decisions are based solely on merit, qualifications, and business needs. We hold our contractors, suppliers, and business partners to the same high standards, conducting regular audits and compliance checks to ensure adherence to our non-discrimination principles and to promote a culture of fairness and respect globally. The Group is required to act in line with the Equality Act 2010 at all times.

Principle 7 - Fair Wages and Working hours

A fair wage and reasonable working hours are fundamental to this policy. We are committed to ensuring that all employees receive wages that meet or exceed legal and industry standards, reflecting the true cost of living and reflecting their skills and contributions. Working hours must comply with national laws and industry benchmarks, guaranteeing that employees are not subjected to excessive hours and have ample time for rest and personal pursuits. Overtime should be voluntary, fairly compensated, and not used to replace regular employment. By upholding these standards, we promote a respectful, safe, and equitable workplace for all.

Principle 8 - Training and Awareness

The Group is dedicated to promoting career development within our workforce. We ensure that all our business entities are proactive in anticipating the short and long-term employment opportunities, and skill requirements. We encourage employees to engage in their development and take up the training and development opportunities offered. This includes job specific qualifications and certifications including FLT and firefighting. Alongside this, employees engage in training on health and safety, equal opportunities, diversity and e-learning topics including modern slavery and cybersecurity.

Principle 9 - Due Diligence and Risk Assessment

Due diligence involves a thorough examination of the company's operations, supply chains, and business relationships to identify, prevent, and mitigate any adverse human rights impacts. This process includes regular monitoring, stakeholder consultations, and comprehensive audits to ensure compliance with human rights standards. Risk assessment focuses on identifying and evaluating potential human rights risks within the Company's sphere of influence. By proactively assessing risks, the Group can implement targeted strategies to address vulnerabilities and ensure that human rights considerations are integrated into decision-making processes. Together, these practices help the Company uphold its commitment to human rights, fostering a responsible and ethical business environment.

Principle 10 - Freedom of Association and Right to Collective Bargaining

All employees have the right to join or establish trade unions of their choice and engage in collective bargaining without discrimination. The Group must maintain a non-discriminatory stance towards trade union activities and ensure that employee representatives are not discriminated against, allowing them to perform their duties in the workplace. In regions where freedom of association and collective bargaining are legally restricted, suppliers must support and not obstruct the creation of alternative means for independent and free association and bargaining.

Principle 11 - Grievance mechanism

The Group has an established Grievance and Disciplinary Policy which applies to all employees. Complaints can be raised through an employee's line manager, local or Group HR representatives, or through Group Legal. Employees can also raise complaints via a confidential reporting line, 'Speak Up', which is independently provided by Navex Global through their EthicsPoint solution. The service is available to all employees, 7 days a week, 365 days a year. Raising concerns regarding human rights in the Group enables management and employees to work together to address any human rights violations witnessed in the workplace, along the supply chain, or within any relevant third-party operations. All reports of human rights violations will be investigated promptly, and any behaviour found to be a violation of human rights will be dealt with accordingly.

Principle 12 - Remediation

The Company is committed to providing or cooperating in legitimate remediation where we identify that we have caused or contributed to adverse human rights impacts. We maintain clear and accessible channels through which employees, contractors, suppliers, and external stakeholders can raise concerns without fear of retaliation. All reported issues are assessed promptly, handled with confidentiality, and addressed through a fair, timely, and transparent process. Where appropriate, we work collaboratively with affected individuals and relevant stakeholders to determine and implement effective remedies that restore rights and prevent recurrence. We also expect our business partners to maintain effective grievance mechanisms and to engage constructively in remediation aligned with internationally recognised human rights standards.

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