

# Volex

# Code of Business Conduct



The Volex plc ("Volex") Code of Business Conduct sets out the basic principles that should be applied by all employees everywhere that we do business. However, such principles can never provide detailed advice on all situations or contingencies; instead, they set a framework for how we should approach doing business.

## General Principles

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 Volex 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.

## Specific Principles

### 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 Bill, 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 Volex. 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 Volex'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.

Where dormitory accommodation is provided by Volex, we will ensure that it is clean, safe and meets the basic needs of the workers.

### 6. Relationships with business partners

Where appropriate we will seek to establish productive relationships with suppliers and business partners, conducting our activities with integrity.

### 7. 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.

### 8. 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, conserving energy and will explore opportunities for re-use 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.

### 9. 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.

### 10. Public communications

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

### 11. Gifts and entertainment

Gifts or favours must never be solicited by Volex 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 the business unit's director and the Volex plc Company Secretary. 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.

### 12. 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 their duties for which they are already bound to perform. Volex does not differentiate between facilitating or accelerating payments from bribes.

### 13. Misuse of company property

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

### 14. Conflicts of interest

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

### 15. 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.

### 16. Political contributions

Volex does not make contributions to any political party and does not support any political parties. If subsidiaries of Volex wish to make political contributions they must first seek local legal advice to confirm that such contributions are proper. In addition, any such contribution must be approved by the Volex plc Board of Directors before it is paid.

### 17. 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 Volex "Right-to-Speak" hotline to raise the matter.

Employees will not be blamed for speaking up nor for failure to speak up earlier, and Volex 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.

**VOLEX PLC BOARD OF DIRECTORS**