

# Speak Up Policy

## Introduction

At Volex we are committed to conducting our business ethically and honestly at all times. We understand and acknowledge the obligations placed on us as a company under the UK's Public Interest Disclosure Act 1998 and note the expansion of protections and obligations arising under the European Union's 2019 Whistleblowing Directive.

## Scope

This policy is applicable to all of our global operations including all of our subsidiaries in which we have a majority ownership (collectively referred to as 'Company' or 'Group' throughout this policy).

This policy covers all our employees; 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 the Group.

In addition any third party acting in good faith can raise a concern via our Speak Up reporting system.

## Our Speak Up reporting system

We have partnered with [Navex Global](#) a leading company in risk and compliance management software and services. We utilise their [EthicsPoint](#) solution. EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment.

## Our Management Framework

In line with our international obligations we:

1. have established an effective and independent Speak Up system that allows any relevant person to report their concerns; we have partnered with Navex's EthicsPoint solution to provide independent and global whistleblowing infrastructure to enable our commitments;
2. updated our Group's Code of Business Conduct which is communicated to all of our employees;
3. we have produced a series of communication tools and deployed these to every site and Group entity to ensure that all of our workforce understand the channels they can use to raise their concerns;
4. we have updated our intranet and web pages to ensure our stakeholders can access our Speak Up reporting systems in case of need;
5. we have assigned Executive responsibility to our Speak Up policy to our Group HR Director and Group General Counsel;
6. we have assigned responsibility for this policy and for ensuring its effectiveness to our Board's Audit Committee.

## Metrics

All cases are reported to our Audit Committee on a periodical basis and statistical data will be published through our Annual ESG disclosures.

## Responsibility

Compliance with this policy is the responsibility of the Board of Directors and will be monitored through our Audit Committee.

## Review of the policy

This policy will be reviewed at least annually.

## Our Policy Principles

### ***Principle 1 - the purpose of our Speak Up policy***

Our Speak Up policy provides a confidential and independent mechanism for relevant persons acting in good faith to report suspected or potentially illegal or unethical behaviour so that the Company is alerted to the potential issue.

### ***Principle 2 - what are the areas of concern that should be reported via the Speak Up reporting system***

There is no complete list however examples of behaviour that should be reported are any acts that appear illegal or unethical, any act that compromises a Group policy or the Group's Code of Business Conduct and any of the items listed in Annex 1.

### ***Principle 3 - Accessibility***

Anyone acting in good faith can make a report (anonymously if you wish, and where local law allows) using a free-phone number or through the online form 24 hours a day, 7 days a week, 365 days a year.

### ***Principle 4 - Confidentiality***

Each person who raises a Speak Up report will be given the option, when making their report via either the independent phone or online services, to choose whether to remain anonymous.

Any personal information provided will be treated on a confidential basis regardless of which option the person chooses, unless we are required by law to disclose it.

If a report is made anonymously, then the person's identity will not be attributed to the report.

NAVEX Global does not generate or maintain any internal connection logs with IP addresses, so no information linking the computer device which made the report to EthicsPoint is available.

### ***Principle 5 - Non-retaliation***

Volex has a non-retaliation policy if a genuine concern is reported in good faith. No action will be taken against the person raising the report even if it is found that there was no wrongdoing, unlawful conduct or breach of compliance.

In many countries individuals are protected by law for raising their concerns (whistleblowing) through a recognised and formal whistleblowing process such as the Volex Speak Up process.

## **The Speak Up process**

For our employees, and other internal colleagues within our global workforce such as temporary, dispatch or our outsourced workers, we always encourage any individual who has a concern about a potential Speak Up issue to talk to their line manager first.

Where the individual does not feel comfortable in discussing their concerns with their line manager then we encourage them to either engage with a member of the Group's HR or Legal teams or to approach any member of the management team.

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However anyone can raise their concerns via the Speak Up reporting system using either the toll-free telephone system or the web-form provided at [volex.ethicspoint.com](https://volex.ethicspoint.com). Both the telephone system and the web form support users are provided in local languages.



## Who is notified when a report is made?

All concerns will be logged and directed to Christian Bedford (Group General Counsel), Jon Boaden (Group Chief Financial Officer) and Alan Taylor (Group HR Director) for further investigation. If either Christian, Jon or Alan are named in the report, the report will be diverted to Emma Mills, Legal Director, at [DLA Piper](#). Your report will always be dealt with in the strictest of confidence.

## How do I track my report?

When a person files a report at the EthicsPoint website or through the EthicsPoint call centre they will receive a unique, randomized number called a “Report Key” and each person will be asked to choose a password.

Each person can then return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer any questions posed by the company’s representative.

Anyone who raises a concern is recommended to return to the site in the time specified to answer any questions raised to them. At this stage the person raising the concern and the company have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

## What happens after I make a Speak Up report?

The Company will appoint an investigator to each report. In some cases, the Company may appoint an investigator or team of investigators, including appropriate employees with relevant experience of investigations or specialist knowledge of the subject matter.

The person who has made the Speak Up report will be informed when the investigator has been appointed.

During the investigation the Company’s aim is to keep the person who has made the Speak Up report informed of the progress of the investigation and its likely timescale.

On conclusion of the investigation the person who has made the Speak Up report will be informed of the conclusion and they will be informed if their report was either substantiated, partially substantiated or not substantiated.

**Date of Last Review:** March 2025

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## Annex 1 - Areas of concern that should lead to a Speak Up report

Issue	Description
Accounting and Auditing Matters	The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting practices. Examples include: mis-statement of revenues, misstatement of expenses, misstatement of assets, misapplications of GAAP principles, wrongful transactions.
Antitrust and Competition	The antitrust and competition laws define acceptable behavior for competing in the marketplace. The general aim of these laws is to promote competition and let businesses compete fairly on the basis of quality, price, service and other valid business criteria.
Bribery and Corruption	Directly or indirectly (i.e. through a third party intermediary or subsidiary) offering, soliciting or accepting a reward or benefit which seeks to induce a person to do anything improper or illegal. Directly or indirectly paying facilitation payments to any officials in order to expedite the performance of duties which they are already bound to perform.
Conflict of Interest	A conflict of interest is defined as a situation in which a person, such as a public official, an employee, or a professional, has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties. Examples include: inappropriate vendor relations, bribery, misuse of confidential information, inappropriate customer relations.
Discrimination or Harassment	Uninvited and unwelcome verbal or physical conduct directed at an employee because of his or her sex, religion, ethnicity, or beliefs. Examples include: bias in hiring, bias in assignments, wrongful termination, bias in promotions, bias in educational decisions, unfair compensation, inappropriate language.
Embezzlement	To appropriate (as property entrusted to one's care) fraudulently to one's own use. Examples include: bookkeeping errors, misapplication of funds, and mishandling of cash.
Environmental Protection, Health or Safety Law	Violation of any environmental law, regulation, company policy or procedure with respect to the handling and disposal of hazardous materials or the health and safety of other individuals.
Equal Opportunity	The Company provides equal employment opportunities to all board directors, officers, employees and job applicants. The Company and its board directors, officers and employees will not unlawfully discriminate against other board directors, officers, employees, or applicants on the basis of race, colour, religion, sex, age, national origin, disability, citizenship, veteran status, or any other status protected by applicable domestic and international laws and regulations.
Falsification of Contracts, Reports or Records	Falsification of records consists of altering, fabricating, falsifying, or forging all or any part of a document, contract or record for the purpose of gaining an advantage, or misrepresenting the value of the document, contract or record.
Illegal or Fraudulent Conduct	Any activity that is prohibited by law or a deception deliberately practiced in order to secure unfair or unlawful gain.
Import/Export	Failure to comply with import, export or tax laws.
Improper Giving or Receiving of Gifts or Entertainment	The giving, receiving or solicitation of items that could reasonably be interpreted as an effort to influence a business relationship or decision, or the provision or participation in inappropriate entertainment events.
Intellectual Property Infringement	Any unauthorized or inappropriate use, misappropriation, or disclosure of confidential information (in any form) or intellectual property belonging to the Company or any customer, supplier or business partner of the Company including, without limitation, any intellectual property protected under any U.S. or other laws relating to copyrights, patents or trade secrets. Also includes any unauthorized or inappropriate use of any Company computer system.
Misconduct or Inappropriate Behavior	Intentional wrongdoing; a wilful act to deliberately violate a standard, policy or law.
Misleading Sales, Marketing & Advertisement	False, misleading or deceptive advertising, packaging, point of purchase displays or promotional materials; deliberately misleading messages, omissions of important facts or false claims about the Company's or competitors' products.
Modern Slavery and Labour Violations	Any examples or evidence of forced labour within our labour force or our supply chain which would constitute modern slavery or human trafficking as defined by the UK Modern Slavery Act. This would include breaches of the RBA's Code of Conduct.
Procurement and Purchasing Practices	Refers to any violation of Company Policy governing procurement and purchasing practices.
Product Quality	Failure to follow applicable laws and regulations governing the manufacture, handling, testing, marketing and distribution of company products and product candidates.
Sabotage or Vandalism	Destruction of an employer's property (as tools or materials) or the hindering of manufacturing by discontented workers. Examples include: equipment destruction, stealing, work slowdown, computer virus
Securities Violations	Infringement, transgression; specifically: an infringement of the rules which securities acts define. Examples include: insider trading.
Side Letters	Any document, communication, or other commitment to a distributor, reseller, end user, or customer that contains agreements or promises different from those in the contract, end user license, invoice, or purchase order.
Substance Abuse	Substance abuse is defined as the misuse of both legal and illegal drugs. Examples include: alcohol, cocaine, narcotics, marijuana, stimulants
Theft	The act of stealing; specifically: the felonious taking and removing of personal property with intent to deprive the rightful owner of it.
Unsafe Working Conditions	Failure to meet those requirements needed to perform all duties in a secure and safe environment. Examples include: environmental damage, clear risk of harm, breaches of recognised health and safety or environmental laws such as OSHA, EPA.
Use of Company Property or Resources	Refers to the use of Company time, materials, assets or facilities (including e-mail and voice mail) for purposes not directly related to Company business, or the removal, borrowing or destruction of Company property without permission.
Violation of Policy	Willful or innocent actions that are in direct violation of company policy, procedures, code of conduct, and/or implied contractual responsibilities. Examples include: non-disclosure agreements, hiring standards, safety, Internet usage, corporate guidelines.
Violence or Threat	Violence is an expression of the intention to inflict evil, injury, or damage to a person or their property. Examples include: direct, veiled, conditional, violent behaviour.

# Speak Up Policy

## Annex 2 - Contact Telephone Numbers

Region	Telephone Number From within the Country
Canada	833 242 6066
China	400 120 0220
Germany	0800 1824325
India	000 800 919 1501
Indonesia	0800 150 3206
Macedonia	0800 8 05 58
Mexico	800 681 9285
Poland	800 005 046
Romania	0800 890 348
Singapore	800 852 6111
Slovak Republic	0800 223 158
Taiwan	00801 49 1619
Türkiye	0800 621 2311
United Kingdom	0800 949 6383
United States	(1) 844 450 1299
Vietnam	1800 400 271

All other countries +1 704 526 2303.