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Neways Electronics International N.V.

Human Rights Policy

Commitment to Communicate to Personnel and External Stakeholders

This Human Rights Policy will be communicated within Neways upon the approval by the Management Board and the Supervisory Board and after each amendment and is at all times accessible for our Personnel (as defined below) through Neways4U and may be obtained at the HQ and local HR office. Our external stakeholders may obtain a copy of this Human Rights Policy through our corporate website and are generally provided a copy at the start of our joint engagement.

Purpose

At Neways we do business with respect for fundamental human rights. This is also reflected in our Code of Conduct, Supplier Code of Conduct and other policies. Our Human Rights Policy is a separate policy to help us to understand, avoid and address human rights related risks. We are committed to comply with the following international standards:

- the Universal Declaration of Human Rights;
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO);
- the Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD);
- the United Nations (UN) Guiding Principles on Business and Human Rights implementing the UN Protect, Respect and Remedy Framework; and
- the Ten Principles of the UN Global Compact.

Neways is committed to ensure the human rights of all of its Personnel and to treat them with dignity and respect. Our goal is to provide a good, healthy and safe work environment. We strive for no safety accidents or incidents to happen and we want to create an environment where Employees feel at home, respected and where they can develop themselves to the fullest extent.

This policy sets out standards for those human rights topics that Neways considers most significant. Clearly, our respect for human rights is not limited to these standards.

Scope

We apply this policy vis-à-vis all companies, individuals and other business partners with whom we do business. This includes business partners that purchase our products, or business partners that provide their products or services to us, including but not limited to, suppliers. Furthermore, this policy applies to Neways Electronics International N.V., its direct or indirect, wholly- and majority-owned subsidiaries (**Neways** or **Company**) and their directors, officers, full-time, part-time, seconded employees, and trainees (**Personnel**). This policy applies in all countries in which Neways operates or conducts business. When the laws of those countries require a higher standard, such standard shall apply. Adherence to this policy is a condition for someone's employment and/or engagement with the Company, and therefore Personnel must disclose any suspected and actual violations through appropriate channels. In this policy we include certain commitments as part of our continuous efforts to operate in accordance with the highest human rights standards.

Neways Human Rights Standards and Commitments

1. No forced labour

We do not tolerate situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as retention of identity papers. As an employee, you are always expected to do your work voluntarily, and you may leave your job or terminate your employment contract at any time in accordance with applicable laws. Fees and costs associated with recruitment and employment should be paid by Neways. All our employees should work freely and be aware of the terms and conditions of their work and be paid regularly and timely as agreed.

2. Child labour and/or hard work

We will never accept that any work will be performed by child and/or hard labour and we expect our business partners and Personnel to observe all supranational and national laws and regulations that are in place in relation to child labour (in particular ILO Conventions 138 and 182). They shall observe the United Nations' Universal Declaration of Human Rights and the international working conditions and circumstances as formulated by the International Labour Organization (ILO). The term child refers to any person under the age of 14 or 15, depending on the law of the country concerned permits, or under the age for completing compulsory education.

3. Non-discrimination

We respect everyone's privacy and personal rights. We are strictly against any form of discrimination, whether it is because of someone's ethnical background, culture, religion, age, ability, race, sexual orientation, political opinion, worldview, gender, or on any other ground. We do not condone any discriminatory behavior within our organization and in the cooperation with our business partners, nor do we condone any intimidation and/or insulting behavior in any way. We expect our business partners and Personnel to apply the same principles.

Undesirable behavior, which includes discrimination, insults, (sexual) intimidation, aggression, threats, racism, harassment and similar acts, whether verbally, physically, digitally, personally or by any other means, is and will never be tolerated. We expect our business partners and Personnel to observe all anti-discrimination provisions of supranational and national laws and regulations.

We employ, reward and promote based on the principle of equal opportunity. This means that we make employment decisions – including hiring, placement, promotion, development, training and compensation – based on factors such as qualifications, experience, performance, skills and potential.

4. Safe work conditions

We believe it is of the utmost importance to protect the health and safety of our employees. We provide protective equipment and training and set rules and procedures to prevent accidents. Our employees and any other persons working directly or indirectly with us or visiting our sites, are responsible to behave safely and must always follow safety rules and procedures.

We expect our business partners to do the same and to consider safe working conditions as one of the top priorities and responsibilities. Responsibility means that, amongst other things, all possible measures must be taken to prevent incidents. Business partners should require their employees to proactively and strictly comply with all safety regulations applicable in their jurisdiction, wear personal

protective equipment if necessary, prevent undesired or unsafe situations and address colleagues about this whenever the need arises.

5. No harassment and violence

A key aspect of safeguarding the personal dignity and equality of each employee is to ensure that harassment and violence, in whatever form, do not occur or are addressed adequately. We do not tolerate physical, verbal, sexual or psychological harassment, bullying, abuse or threats. We do not tolerate such acts in the workplace, nor in any work-related circumstance outside the workplace, such as work-related events.

6. Responsible sourcing of minerals

Neways' suppliers shall have policies to assure that the tantalum, tin, tungsten and gold (also known as 3TG) in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights in the Democratic Republic of Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available on request. Neways expect supplier support regarding conflict minerals-free compliance in their supply chain and thus deliveries to Neways. Neways also encourages and support our clients to follow the conflict mineral-free initiatives within the industry.

Please also refer to our Conflict Minerals Policy.

7. Freedom of association and the right to collective bargaining

We respect our employees' freedom of choice to be legally represented by a labour union without fear of retaliation. Where employees are represented by a legally recognized labour union, we will establish a constructive dialogue with this labour union. Where local laws and practices restrict the right to freedom of association and collective bargaining, we endeavour to develop other ways to have a meaningful dialogue with employee representatives, without breaking local law.

8. Work-life balance

We recognize the right to rest and leisure and will therefore always comply with the ILO-conventions, local laws, regulations and local customs with regard to working hours, overtime and rest. We support a healthy balance between the working and private lives of our employees. Workweeks are not to exceed the maximum set by local law, except in emergency or unusual situations.

9. Recognition and reward

All of our employees should be paid sufficiently for a decent standard of living, enough to satisfy basic needs for the employee and his/her family. Where the local statutory minimum wage is non-existent or not sufficient to ensure a decent standard of living, we will pay our employees enough to meet this standard. Employees are paid in a timely manner by means of a wage slip or similar document.

10. Respect for human rights in high risk contexts

We recognize that we may face human rights dilemmas in countries that are politically less stable or where human rights are compromised. In such circumstances we critically review whether we can continue to operate in such countries, and if so, how. We will always protect the security of our employees, their relatives and of our facilities.

Integration and our expectations of Personnel

Neways' commitment to respect and promote human rights is integrated into various operating policies. We will exercise our leverage in order to address an adverse human rights impact. All of our employees are expected to follow our Code of Conduct and this Human Rights Policy. We set clear expectations on the businesses we engage with to prevent potential risks from becoming reality, as also laid down in the Supplier Code of Conduct. We will support our Personnel in converting this policy into practical tools by developing relevant human rights guidelines. We will continuously update these guidelines based on revisions and stakeholder engagement (as further set out below). The Management Board is committed to adopt programs to address industry-specific human rights exposure.

Commitment to Monitor

We are committed to monitor compliance with our Human Rights Policy. Through our operational audit procedures, we regularly monitor if Neways' codes and policies are followed within our own operations. We actively monitor our supply base via supplier contacts/visits, and supplier audits on site. Neways expects our suppliers to adhere to our Supplier Code of Conduct and to have processes in place to remediate any human rights impacts they cause or contribute to.

Commitment to Report

Human rights impacts are not static but ever-evolving. We recognize that doing business with respect for human rights is an ongoing process that requires continuous learning, transformation, and collaboration. We will therefore regularly review and update our salient human rights issues and any resulting changes to what we do. We will regularly report on the progress through our Annual Report (if made public).

Commitment on Remedy and Grievance Procedures

We are committed to provide remedy to correct negative impacts of human rights violations across our value chain. Respect for human rights includes preventing human rights issues or addressing them at an early stage or to seek adequate remedy in case human rights are violated. First of all, we always promote an open feedback culture. Personnel or business partners that observe or suspect a possible violation of these standards during their employment, in our own operations or in the value chain are actively encouraged to report their concerns to a senior manager, HR or to our Management Board, respectively. All reporting is done confidentially. Our remedy framework is two-fold.

1. Using our leverage to ensure effective remedy through our business

According to UN Guiding Principles "*companies should have processes in place to enable effective remedy for people harmed by any adverse human rights impacts the companies cause or to which they contribute*". Through our various roles, Neways may be causing, contributing or be linked to human rights exposure. What this means for remedy, has been a topic of attention in 2023. Neways recognizes the need for an approach where stakeholders can reach us if they feel we have been a source of a negative human rights impact. As part of our commitment to human rights, we are open to receiving complaints from any stakeholder about our human rights performance. This can be done in two ways:

- Via the stakeholder's business partner who can direct the complaint or concerns to the Ethics and Compliance Officer for further investigation. Any stakeholder can report "suspected or

actual criminal conduct, unethical conduct or other misconduct, including a human rights violation, by or within Neways”.

- Via a legitimate external processes such as through the OECD Dutch National Contact Point, aimed at addressing and resolving grievances related to alleged breaches of the OECD Guidelines.

Additionally, we are committed to apply human rights due diligence or conduct risk assessments. We promote collaborative and multi-stakeholder initiatives that provide for effective grievance mechanisms and/or other measures of adequate accountability. It is essential that companies strive to prevent issues by engaging proactively with all their stakeholders. Shortcomings in our suppliers’ and customers’ grievance mechanisms may trigger the need for additional due diligence and dialogue.

2. Remedy for our Employees

Reference is made to our whistleblower policy that helps Neways to take appropriate and adequate action if there is a concern about (suspected) social wrongdoing including any wrongdoing where social interests are at stake.

If you notice something that you believe is in conflict with Neways’ core values, Trust, One Team, Passion, Innovation, Customer Focus, the Code of Conduct or any other policy, we encourage you to first talk to your direct manager about it. If that is not appropriate or if it does not resolve the issue, you can talk to your local HR manager or to the HR manager of another Neways group company. Does this still not resolve the issue, please contact the General Counsel. If the suspicion of social wrongdoing involves a person that is indicated to be the person to whom a report should be filed, the reporter can then report to a Neways employee with a similar role.

Implementation and Compliance Audits

This policy describes general rules. More specific behavioral rules may be defined in documents such as in our agreements with our business partners. Should any discrepancy exist between these general rules and more specific rules, then the latter prevails. Compliance with legal requirements and this policy may be regularly audited by Neways. We expect our Personnel and business partners to provide us with all reasonable cooperation.

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Effective 6 November 2023

Approved by the Management Board and the
Supervisory Board

NEI-POL-N101 Rev. 2.0

