



neways

Neways Electronics International N.V.

# Business Ethics Policy

## **Management Approval and Responsibility**

The Management Board of Neways Electronics International N.V. (**Neways**) adopted the following policy on 6 November 2023. The Management Board, together with the General Counsel, is responsible for overseeing business ethics issues. The Management Board is furthermore responsible for the development and, together with the General Counsel and HR department, implementation of this Business Ethics Policy, including a fit for purpose Ethics & Compliance Program.

## **Introduction**

This Business Ethics Policy reflects the commitment of Neways and its subsidiaries to conduct their business in accordance with applicable local and international laws, rules and regulations, as well as the various codes, policies and other standards that Neways has adopted. These are all accessible through Neways4U and may also be obtained from the secretary to the Management Board.

The objective of this Business Ethics Policy is to:

- outline the expectations that Neways and its subsidiaries have of its employees and their behavior relating to ethics & compliance and corresponding laws and regulations;
- ensure that employees understand the importance of conducting business in an ethical way and respecting the principles that are set out in the Code of Conduct, the Human Rights Policy and the Customer & Supplier Screening Policy (Sanctions);
- highlight the role of managers within the Neways organization in leading ethics & compliance efforts by creating a business environment in which employees understand their duties and feel safe to speak up about issues relating to ethics & compliance without fear of retaliation; and
- detail the requirements for the Ethics & Compliance program and the minimum standards that apply thereto.

## **Applicable Laws, Rules and Regulations**

Neways operates in a regulated environment and in many different countries and regions, each with its own set of laws, rules and regulations. It is not possible for all Neways managers to know and understand every law, rule and regulation to which Neways may be subject. It is, however, important for all managers to have an understanding of the laws, rules and regulations that apply to the businesses for which the relevant manager is responsible and conduct a risk-based approach to ensuring that the employees of all Neways companies comply with such laws, rules and regulations. If a manager is uncertain about which laws, rules or regulations apply or about their terms, then he or she should consult the Ethics & Compliance Officer. The Ethics & Compliance Officer is Tom Nievergeld, General Counsel.

## **Roles & Responsibilities**

The Management Board is responsible for the development and, together with the General Counsel and HR department, implementation of this Business Ethics Policy and a fit for purpose Ethics & Compliance Program. The Ethics & Compliance program facilitates compliance with the above principles and allow for the effective management, monitoring and reporting of ethics & compliance risks. The Ethics & Compliance Officer will lead the Ethics & Compliance function and lead the implementation of this Business Ethics Policy and the Ethics & Compliance Program. The Ethics &

Compliance Officer will report to the Management Board on the design and implementation of the Ethics & Compliance Program.

### **Fit for purpose Ethics & Compliance Program (including education & training)**

Our Ethics & Compliance Program is built on a risk analysis. The Ethics & Compliance Program includes (at least) the following minimum elements:

- a clearly defined ethics & compliance structure;
- ongoing identification and monitoring of applicable laws, regulations and key ethics & compliance risks relating to the business activities;
- clear policies and procedures based on the Code of Conduct and Neways' minimum standards supplemented with business specific or additional local requirements;
- a training and awareness program for employees focused on the key ethics & compliance risk areas that have been identified;
- a process setting out how to identify, assess and respond to ethics & compliance risks, incidents and issues (including speak up matters). The Ethics & Compliance Officer should be included in the escalation process for all material ethics & compliance issues, incidents and investigations;
- periodic reporting on the progress and status of the Ethics & Compliance Program (including any ethics & compliance issues, incidents and investigations); and
- a plan to monitor, review and improve the Ethics & Compliance Program on an ongoing basis (including monitoring the regulatory and business environments and developing appropriate responses to changes in both). A monitoring plan should include activities to assess whether key ethics & compliance controls are operating effectively. It is an expectation that accurate records and documentation relating to the Ethics & Compliance Program and related ethics & compliance initiatives be maintained.

### **Topic Areas**

The Ethics & Compliance Program will furthermore at least cover the following areas:

- The Code of Conduct;
- Anti-Bribery and Anti-Corruption rules laid down therein;
- The Human Rights Policy;
- The Whistleblower Policy (including Speak Up);
- Sanctions and Export Controls; and
- Anti-Money Laundering and Counter Financing of Terrorism.

### **Policy Scope and Governance**

This Business Ethics Policy applies to all subsidiaries, directors, officers and employees of Neways. Breaches of this Business Ethics Policy may result in disciplinary action up to, and, including dismissal. The Ethics & Compliance Officer serves as the point of contact for this Business Ethics Policy and will

monitor the design, implementation, adequacy and effectiveness of the Ethics & Compliance Program, as necessary. The Management Board may also require other independent assurance on the effectiveness of ethics & compliance. This Business Ethics Policy will be reviewed on an annual basis by Neways Ethics & Compliance.

**Speak Up**

If you believe that there has been a breach of this Business Ethics Policy (or intention to do so), we encourage you to speak up in accordance with our Whistleblower (Speak Up) Policy.

Neways Electronics International N.V.

Science Park Eindhoven 5010

5692 EA Son

The Netherlands

[info@newayselectronics.com](mailto:info@newayselectronics.com)

+31 (0)40 2679 200

Effective 6 November 2023

Approved by the Management Board and the  
Supervisory Board

NEI-POL-N102 Rev. 2.0

