



neways

Neways Electronics International N.V.

Political  
Contributions  
Policy

## Management Approval

This Political Contributions Policy has been approved by the Management Board on 6 November 2023. Subsequently, the Supervisory Board has approved this Political Contributions Policy on 6 November 2023.

## Purpose

While public policy issues may have a potential impact on Neways' business, its Personnel (as defined below), and the communities in which we operate, it is Neways' position that **Political Contributions (as defined below) are prohibited. This policy prohibits political involvement of any kind on the Company.**

This policy is without any prejudice to our Code of Conduct, the provisions on anti-bribery and anti-corruption included therein in particular, pursuant to which you are prohibited from offering, promising, authorizing, making, soliciting or accepting, directly or indirectly through a third party, e.g. a commercial agent, shipping agent, etc., anything of value, monetary or otherwise (including gifts and other favors), to any government official or private person for the purpose of improperly obtaining or retaining business.

**Interactions with government officials present heightened corruption risk and require special attention, and often rules and processes will be more stringent. Government officials also include any political party, party official, or candidate for political office.**

## Scope

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 and seconded employees (**Personnel**). You are expected to act in a manner that will enhance Neways' reputation for honesty, integrity and reliability. 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 of your employment and/or engagement with the Company.

## Defined Terms

The defined terms below will have the following meaning in this policy:

**Political Contribution:** Any corporate spending by the Company in the form of a gift, loan, advance or deposit of money to (a) candidates running for supranational, national or local office; (b) national or local political parties or committees; (c) a Political Entity; and (d) political initiative campaigns and committees.

**Political Entity:** Organizations whose primary purpose is to engage in political activities in the broadest sense.

## Company Political Contributions (prohibition)

The Company hereby prohibits any Political Contribution.

**Personal Political Contributions**

You may not make any Political Contributions as a representative or on behalf of Neways, and you may not use Neways' name in any way that may create the impression that you are speaking or acting for or on behalf of Neways. Neways will not recognize, reimburse, or compensate Personnel for their personal Political Contributions. You may not pressure or coerce any Personnel to make personal Political Contributions or take any retaliatory action against Personnel who do not make such contributions.

**Lobbying**

Neways' business is subject to various laws and government regulations. In the future, Neways may work with lawmakers and government agencies regarding policy and legislation that may affect the manner in which we conduct some aspects of our business. You may not contact any government personnel on behalf of Neways regarding legislation, existing laws and regulations, and governmental actions, or engage in any other lobbying activities on behalf of Neways, without the prior approval of the Management Board and the Supervisory Board and at all times in accordance with applicable laws and regulations.

**Commitment to disclose Lobbying Expenditures (if any)**

Lobbying expenses are generally prohibited, but if they are made (subject to the prior approval of the Management Board and Supervisory Board) they will be properly disclosed.

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Effective 6 November 2023

Approved by the Management Board and the  
Supervisory Board

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