

ETHICAL CODE OF CONDUCT ("CODE")

1. INTRODUCTION

- 1.1. Marshall Amplification Plc ("**Marshall**") strives to behave ethically in all of its operations and is committed to continuous improvement. Marshall expects all organisations who provide goods and services to, for or on behalf of it (including e.g. licensees, suppliers, manufacturers, agencies and contractors) ("**Suppliers**") to do the same and adhere to the highest standards of business integrity.
- 1.2. This Code sets out the ethical trading standards which are required by Marshall. These standards are intended to meet international laws, declarations, conventions and guidelines, as well as societal and industry expectations and internal standards and values. Where these standards go beyond applicable law, they must be met in addition to any legal and/or regulatory compliance.
- 1.3. Suppliers must comply with this Code both in their organisations and in their supply chains (including e.g. subsidiaries, partners, suppliers, agents, sub-contractors, employees and any other personnel). Suppliers must be able to demonstrate that they have taken adequate steps to actively (a) communicate these standards to their organisations and supply chains, (b) monitor compliance with these standards, and (c) remedy any areas of non-compliance promptly.
- 1.4. Marshall will monitor its Suppliers' compliance with this Code through reviews, assessments and/or audits. For these purposes, Suppliers must disclose complete and accurate information to Marshall. Any attempts to conceal, falsify or withhold any information will be treated as a serious breach of this Code. Suppliers must report any potential, suspected or actual breach of this Code to Marshall and Marshall will support any Suppliers who disclose difficulties in complying with this Code.
- 1.5. Marshall keeps this Code under regular review, and any updates to these standards will be communicated to Suppliers. This Code was last updated on 26 January 2022.

2. BUSINESS INTEGRITY

- 2.1. Suppliers must:
 - 2.1.1. have all legally required permits, licences and registrations to operate;
 - 2.1.2. keep updated about, comply with and be able to prove compliance with applicable law regarding human and labour rights, health and safety and environment and ethics; and

- 2.1.3. establish, implement and maintain management systems (e.g. company representatives, implementation plans and training programs) which facilitate compliance with this Code.
- 2.2. Marshall is committed to combatting bribery and corruption and fosters a culture across its operations and its supply chain to identify, resist and eliminate bribery and corruption. Suppliers must:
 - 2.2.1. not engage in any form of bribery or corruption;
 - 2.2.2. implement processes to prevent all forms of bribery and corruption (e.g. training programs and company policies); and
 - 2.2.3. manage any conflicts of interest and ensure that any personal interests or relationships do not influence decision making.
- 2.3. Marshall reserves the right to withdraw orders immediately and without notice if there is evidence of a Supplier (or any part of its supply chain) being complicit in bribery or corruption, including any attempt to bribe a Marshall representative.

3. WORKERS

General:

- 3.1. Suppliers must:
 - 3.1.1. ensure all workers have a legal right to work;
 - 3.1.2. ensure all workers are treated equally and with respect and dignity;
 - 3.1.3. ensure the health, safety, security, protection and welfare of all workers;
 - 3.1.4. not use any forced, bonded, compulsory or any other involuntary labour (e.g. prison labour or human trafficking);
 - 3.1.5. not use any Child Workers¹; and
 - 3.1.6. operate a zero tolerance policy against any corporate punishment, abuse, harassment, victimisation, discrimination, intimidation, false promises, public warnings, punishment systems and any other harsh or inhumane treatment.
- 3.2. Workers must be recruited, employed or engaged voluntarily and have the freedom to leave their employment or engagement.

¹ "Child Worker" means a person who is not legally entitled to work because they are below the minimum age of employment or under the age of 15 (whichever is lower).

- 3.3. Workers must be able to communicate openly about their working conditions without fear of reprisal, intimidation or harassment.
- 3.4. Workers must be given a fair disciplinary, grievance and appeal procedure which is compliant with applicable law.
- 3.5. Workers must be free to associate or unionise, or to form any other work groups, committees or organisations, without fear of reprisal, intimidation or harassment.
- 3.6. Workers must not have any unreasonable restrictions put on their freedom of movement (e.g. by denying access to identity, work or immigration documents or by locking workers into their workplace).
- 3.7. Workers must be provided with clear, accurate and complete information about their rights under contract and applicable law. Suppliers must ensure that workers understand their rights properly. Written employment contracts must be used.
- 3.8. Suppliers must maintain the confidentiality of their workers' personal information and respect their rights to privacy and freedom of expression.

Remuneration:

- 3.9. Workers must be paid in full on time (at least monthly) and at a level which meets or exceeds a Living Wage².
- 3.10. Workers must be provided with all benefits they are entitled to under applicable law (e.g. overtime, paid leave, sick pay, state contributions and social security or insurance).
- 3.11. Use of apprenticeships, training, temporary or agency contracts must not be used as a means of denying workers their rights under applicable law.

Hours:

- 3.12. Working hours must comply with applicable law. Additionally, workers' health, safety and welfare must always be safeguarded (e.g. by setting a maximum number working hours, or a minimum number of days off, in a given period). Adequate systems must be in place to ensure weekly working hours are controlled within limits except in emergency or exceptional circumstances.
- 3.13. Workers must be entitled to take reasonable absence from work on the grounds of genuine incapacity through illness without any penalty, loss of future opportunity or threat of dismissal.
- 3.14. Workers must be able to refuse to work overtime without any penalty, loss of future opportunity, or threat of dismissal.

² "Living Wage" means a wage which meets or exceeds national legal standards or industry benchmarks (whichever is higher), and must be at least sufficient to meet basic needs and provide discretionary income.

Child/Young Workers:

- 3.15. Suppliers must have adequate systems in place to verify the ages of all workers.
- 3.16. Suppliers must not use Child Workers.
- 3.17. Suppliers may use Young Workers³ but must comply with any additional requirements (e.g. health and safety risk assessments, restricted working hours and protection from unsafe and hazardous work).
- 3.18. Children must be given adequate care, safety and supervision when living in on-site accommodation or when brought on site by their parents/guardians. Children must not enter any production areas at any time even if they are above the minimum age for a Child Worker. Suppliers must ensure that all premises are safe for children.

4. HEALTH, SAFETY AND SECURITY

- 4.1. Suppliers must have adequate systems in place to actively predict, identify, manage, minimise, eliminate and remedy any health, safety and security hazards and risks (e.g. fire, accidents, chemicals and hazardous substances) and to actively protect the health, safety and security of workers, including:
 - 4.1.1. safe systems of work (e.g. adequate signage, protective clothing/equipment, safety rails/guards/coverings, exit/escape routes, evacuation procedures, emergency lighting and fire/electrical/noise safety measures);
 - 4.1.2. formal and regular risk assessments;
 - 4.1.3. accident/incident/crisis reporting (including near-accidents and unsafe situations);
 - 4.1.4. training (e.g. fire, first aid and use of machinery/equipment);
 - 4.1.5. safety drills and tests;
 - 4.1.6. hazard identification; and
 - 4.1.7. emergency preparedness.
- 4.2. Workers must have access to:
 - 4.2.1. proper light;
 - 4.2.2. proper ventilation;

³ "Young Worker" means a person who is legally entitled to work (i.e. above the minimum age of employment or the age of 15 (whichever is lower)) but who is below the age of 18.

- 4.2.3. clean running water;
- 4.2.4. protection from extreme temperatures and unacceptable noise levels;
- 4.2.5. measures to prevent ergonomic risks (e.g. working position, repetitive movements, physical loads and lifting positions); and
- 4.2.6. in the case of accidents, necessary medical treatment and safe return to work.
- 4.3. Workplaces must be safe, clean, sufficient, well maintained and of sound structure (including toilets, canteens and any other on-site facilities).
- 4.4. Workers must be given any necessary protective clothing and equipment without any charge and always at the cost of the Supplier.
- 4.5. Suppliers must ensure that any equipment/machinery is in good working order and repair and that it is kept safely and securely to prevent any injury to workers.
- 4.6. Suppliers must comply with any additional requirements regarding chemical safety (e.g. REACH) not only for the safety of their workers but to protect and preserve the environment.
- 4.7. Any residential accommodation (including any facilities such as toilets, bathrooms and kitchens) must be safe, secure, clean, well maintained, of sufficient space, structurally sound and kept separate from any production areas. Sleeping arrangements must be adequate, reasonably private and have appropriate separate facilities for men, women and children. All health, safety and security measures described above also apply to any residential accommodation.
- 4.8. Suppliers must meet the following standards (or equivalents to) SA8000 and Worldwide Responsible Accredited Production.

5. ENVIRONMENT

- 5.1. Suppliers must protect and preserve the community, environment and animal welfare.
- 5.2. Suppliers must have all necessary environmental permits, approvals and registrations and comply with any requirements, restrictions or prohibitions regarding raw materials or hazardous substances.
- 5.3. Suppliers must consider their environmental performance, optimise their use of finite resources such as energy, water and raw materials and minimise any harmful impacts that they may have on the community, environment and natural resources in all of their operations (e.g. when sourcing, storing and using energy, water, raw materials, conflict minerals and hazardous substances, in manufacturing processes, in waste production, handling and disposal, and in air/greenhouse gas emissions). Any waste must be re-used and, if not possible, recycled. Landfill must always be avoided.

- 5.4. Suppliers must verify and prioritise the use of more sustainable raw materials such as pre- or post-consumer recycled fibres, organic materials (e.g. organic cotton) or sustainable alternatives (e.g. lyocell products, linen and hemp). Organic materials must meet standards such as (or equivalent to) Global Organic Textile Standard, Organic Content Standard, OEKO-TEX Standard 100 or Soil Association Organic Standard. Non-organic materials must meet standards such as (or equivalent to) Better Cotton Initiative, Fairtrade/Fairtrade Cotton, World Fairtrade Organization. All materials must be responsibly sourced and must not be sourced from areas with known human rights violations or a high risk of forced labour.
- 5.5. Suppliers must verify and prioritise animal welfare when using any animal products. Leather, wool, cashmere, mohair and any other animal hair may only be used if sourced from suppliers with a good track record of animal welfare and who meet standards such as (or equivalent to) Cruelty free. Fur, feather and down, shell horn and bones or any part of any vulnerable, endangered, exotic or wild caught species must not be used. Testing of any products or ingredients on animals is strictly prohibited.
- 5.6. Suppliers must not directly or indirectly contribute to conflicts or conflicted affected areas (e.g. through sourcing minerals). Suppliers must take necessary actions to continuously improve knowledge regarding components that can contain minerals that may directly or indirectly finance or benefit armed groups. Suppliers must provide Marshall with information regarding smelters or refiners for minerals used in Marshall's products such as tin, tantalum, tungsten, gold and cobalt.
- 5.7. Suppliers must identify, monitor and have a systemic approach to reduce direct and indirect greenhouse gas emissions from its own operations. Suppliers must provide Marshall with information about the materials used in Marshall's products such as the content, weight and any recycled and bio-based content.

Read, understood and agreed by **Supplier:** BELTON Engineering Co.,LTD

Date: DEC. 15. 2023
