

## ***Policy and Declaration***

### **Ethical practices**

**Ethical practice:** Fair and honest dealings in compliance with legal, regulatory and moral obligations.

**Bribery:** Giving or receiving of something of value (tangible or intangible) in order to influence proceedings or decisions.

**Corruption:** Deceptive, exploitative or illegal practice.

**Slavery and Human Trafficking:** see United Kingdom ***Modern Slavery Act 2015***, Part 6: *Transparency in Supply Chains etc*

ADAPT ems Ltd. ("ADAPT", "the Company") is committed to employing and promoting ethical practices in all of its business activities and dealings with customers, suppliers and other stakeholders.

#### ***Ethical practice***

Employees of the Company shall act at all times in good faith to provide professional conduct, honest communication, accurate reporting, protection of Intellectual Property and fair competition, so as not to unfairly disadvantage any party or compromise the reputation of the Company.

#### ***Bribery and Corruption***

No employee of the Company shall offer, solicit or accept anything of value, undertake any practice or exploit any unfair advantage in order to influence any due process or decision.

#### ***Slavery and Human Trafficking***

ADAPT wholly repudiates any ownership, inhumane treatment, exploitation or coercion of, or physical or mental threats against, any person in order to restrict their freedom of choice or movement and obtain work on unfair terms, whether in the United Kingdom or elsewhere in any part of the Company's supply chain.

ADAPT operates within the United Kingdom and adheres strictly to all aspects of UK employment law and verifies employees' *bona fide* rights to reside and work in the UK. All work is compensated by freely negotiated salaries, under individually agreed terms of employment. The Company has an Equal Opportunities policy and fosters a culture of openness and freedom of expression. Opportunities for employees to understand their rights and manage their circumstances include a sponsored independent online/telephone helpline to support their wellbeing. All employees speak English and can communicate without intermediaries.

## **Violations**

Violation of any of these principles by employees of the company by knowingly participating in, benefitting from, encouraging, condoning or failing to report to the Company any experience or genuine suspicion of any instance of (what might be perceived as) unethical practice will be investigated and will result in suitable action being taken. Knowledge or genuine suspicion of any unethical practice by or on behalf of any of ADAPT's stakeholders will be promptly reported to management for investigation and suitable action. Suitable actions may include disciplinary action in accordance with Company procedures; amendment or curtailment of ADAPT's dealings with customers, suppliers or other stakeholders; or communication with relevant legal authorities, regulatory bodies and trade organisations.

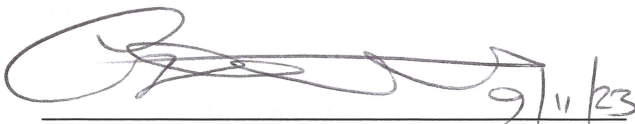
## **Modern Slavery and Human Trafficking Statement**

As a Small to Medium-sized Enterprise (SME) below the threshold specified for the Act of 2015, ADAPT is not obliged to publish an annual Modern Slavery and Human Trafficking Statement. Furthermore, while the Company fully endorses the aims of the Act, ADAPT believes that as a Contract Electronics Manufacturer several tiers removed from the primary sources of minerals and materials, with long and complex supply chains spanning the globe, its ability to provide the benefits of electronic devices for a wide variety of applications exceeds its capacity to eliminate risks to human beings associated with the electronics industry. The scale of the Company's operation is not amenable to measurable goals with regard to finding and eliminating human rights abuses in its supply chains. Therefore, it is not appropriate for the Company to compile an annual statement in line with section 54(4) of the Act.

However, ADAPT does stand by the principles of ethical behaviour, considers the context and impact of proposed customer contracts, and gives preference to suppliers with commitment to ethical practices.

The Company hereby declares that it does not knowingly allow, support or contribute to any unethical or illegal practice or humanitarian abuse, including Modern Slavery or Human Trafficking.

For an on behalf of ADAPT ems Ltd,

A handwritten signature in purple ink, appearing to read 'Guy Janney', followed by the date '9/11/23'.

Guy Janney, Managing Director.