OXFORD INSTRUMENTS

Code of Conduct



Oxford Instruments plc

About Oxford Instruments

Oxford Instruments provides academic and commercial organisations around the world with market-leading scientific technology and expertise. We specialise in three key market segments: Materials Analysis, Healthcare & Life Science, and Semiconductors.

Innovation is the driving force behind our growth and success. Our technology and scientific expertise enable our customers to discover and bring to market exciting new advances that drive human progress. Our core purpose is to accelerate the breakthroughs that create a brighter future for our world.

Founded in 1959 as the first technology business to be spun out from the University of Oxford, Oxford Instruments is now a global company listed on the FTSE 250 Index of the London Stock Exchange.

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Chief Executive's message

Committed to upholding the **highest ethical standards**



At Oxford Instruments, we are committed to upholding the highest ethical standards in all our interactions with our colleagues, customers, suppliers, and the stakeholders in our wider network. I firmly believe that how we run our business is as important as what we do.

Our purpose, our values, and our ways of working set out the principles which underpin our approach to operating in an inclusive, responsible, and sustainable way and with integrity at all times. Guided by these principles, this Code of Conduct makes clear our expectations of our employees and provides guidance on key areas.

Please read it carefully, make sure you understand it, and refer to it regularly to make sure that in everything you do, you behave in a way that aligns with the high standards we expect from everyone who represents Oxford Instruments.

If you are concerned that you have witnessed or experienced behaviour that does not align with this Code of Conduct, you should challenge it, either directly or using the channels set out on page 31.

I give you my assurance that you will be treated fairly, and that there will be no negative impacts of reporting concerns in good faith.

Thank you for your attention to the Code and for your commitment to acting in line with the high expectations placed upon you as an ambassador of Oxford Instruments.

Richard Tyson, CEO, Oxford Instruments plc

Introduction to **the Code**

This Code of Conduct (referred to as our Code) sets out the actions and behaviours expected from all those who work for and on behalf of Oxford Instruments around the world. It provides guidance on identifying ethical issues and suggests ways to either prevent them or respond to them if they cannot be avoided.

Operating responsibly and to a high ethical standard is not only the right thing to do – it is critical to our ongoing good reputation and the success of our business.

Who does the Code apply to, and where does it apply?

The Code applies globally to all Oxford Instruments employees and to anyone else working for us or on our behalf, including any contractors, consultants, agents and distributors we appoint. We expect our business partners to act with similarly high ethical standards.

This Code does not form part of any contract of employment or contract to provide services, and we may amend it at our discretion at any time.

What happens if someone breaches the Code?

We take non-compliance with any aspect of the Code extremely seriously.

Not adhering to the guidance set out on these pages can trigger civil or criminal sanctions against Oxford Instruments. It can also have serious consequences for individual employees and business partners, including:

- internal disciplinary actions, up to and including dismissal; and/or
- immediate termination of any agreement with a business partner.

Where should I go for support and guidance?

If you have questions about the Code, please speak to your line manager or a member of the HR team.

You can also email the Group Compliance team at compliance@oxinst.com

If you have a concern about an action or behaviour you believe is inconsistent with this Code, you can report it anonymously by contacting our independent whistleblowing service provider, Safecall. The service is available from anywhere in the world, 24 hours a day, every day of the year, in more than 175 languages and dialects.

Further information and full contact details are available via this link: www.safecall.co.uk/clients/oxinst/





Our values and ways of working

At Oxford Instruments, we seek to create an inclusive culture where we build strong connections and keep our promises – to each other and to our stakeholders.

Our ways of working, set out below, guide our behaviour and the choices we make every day, helping us to deliver on our commitments and uphold our values.

We encourage you to familiarise yourself with them, refer to them frequently, and challenge yourself to consider whether you are living them in your day-to-day work.

Our ways of working



We start with the **customer**.

- We listen carefully to our customers, focusing on what is most important to them and their markets.
- We put the customers' needs at the centre of our conversations and decision-making.
- We prioritise customer concerns, acting at pace to resolve them.



We succeed by being **focused**.

- We stay focused by saying no to the hundred other good ideas.
- We seek to make everything as simple as it can be, but not oversimplified.
- We act decisively, with rigour and discipline to see things through.



We make and keep **our promises**.

- We are explicit and straightforward in our expectations and commitments.
- We hold ourselves and each other to our promises.
- We raise concerns and resolve conflicts in open, honest, respectful, discussion.



We work **together** as one team.

- We collaborate across Oxford Instruments, minimising duplication and delivering a joined-up customer experience.
- We seek out and share best practice, learning and improving how we work together.
- We listen carefully to truly understand diverse perspectives and find solutions for our collective success.



We help and **trust** each other to succeed.

We get to know each other and show respect for our different expertise and contributions.

We empower each other to take action and do our best work.

We nurture our people and teams, celebrate their successes, and support them to grow.

Underpinned by our values



Inclusive

By seeking out different perspectives and diverse collaboration, we deliver better solutions and lasting success.



Innovative

Through our knowledge, expertise and focused curiosity, we create new possibilities for ourselves and for our customers.



Trusted

We build successful, long-term relationships based on accountability, integrity and respect.



Purposeful

We care, and our passion and commitment drive positive change in the world.

How we do business



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How we do business

Anti-bribery, anti-corruption and fraud prevention

When dealing with our business partners, suppliers and customers, or engaging with public officials, it is important that we maintain high ethical standards and the greatest level of integrity and transparency. We do not tolerate bribery, corruption, fraud or other dishonest business activity of any kind, regardless of whether it is conducted directly or through a third party.

All employees, contractors and those who act on our behalf are strictly prohibited from engaging in fraudulent activity, deception or abuse of their position for personal, financial or commercial gain, or for the benefit of a third party including customers. This includes, but is not limited to, manipulating data, falsifying or misrepresenting documents, expenses or business records, concealing or failing to disclose conflicts of interest, submitting false information, or otherwise acting dishonestly in connection with Oxford Instruments' business.

Examples of bribery include giving or receiving cash, excessive hospitality and gifts, or some other favour such as an offer of employment to a relative of the person being bribed. Other examples include kickbacks and "facilitation payments", also known as "grease payments", paid to public officials or others as a means of speeding up an administrative process.

Such activity is unethical and, in many cases, illegal. We expect everyone who works for us, or acts on our behalf, to comply with all applicable anti-corruption, anti-bribery, anti-fraud and financial crime laws in the countries in which we operate.

Any suspected bribery, corruption, fraud or dishonest conduct must be reported promptly. Suspected misconduct will be investigated and may result in disciplinary action, dismissal, termination of a business relationship and, where appropriate, referral to law enforcement or other competent authorities.

To help you understand and recognise what constitutes bribery, corruption, fraud and dishonest conduct, and ways to avoid them, we have published detailed policy documents and made available comprehensive training courses. We require you to complete applicable training as assigned.

Q&A

A procurement official has offered to correct some errors in the paperwork we submitted as part of a response to a public tender. To do so is risky for his job, so he has asked for a small facilitation payment in return. It would avoid the need to reissue the tender and would prevent us from losing the business. Is it OK to pay the procurement official?

No. To go ahead with the procurement official's suggestion would amount to offering a bribe to a public official, which is a criminal offence in many jurisdictions. In suggesting such a payment, the procurement official is likely to have committed an offence as well. You must decline the suggestion and speak to our Group Compliance team as soon as possible to obtain further guidance.

For further guidance, you should:

- speak to your line manager or to the Group Compliance team;
- read the Anti-Bribery and Anti-Corruption Policy;
- read the Whistleblowing Policy;
- read the Prevention of Financial Crime policy;
- read the Share Dealing Policy;
- read the Conflict of Interests Policy.

Q&A

A colleague has asked me to approve an expense claim that includes costs I do not recognise, and which do not appear to relate to legitimate business activity. They say it is urgent and that they will explain later. Should I approve it?

No. You must not approve expense, records or transactions that you believe may be false, inaccurate or misleading. Falsifying expenses or mispresenting records may amount to fraud. You should ask for appropriate supporting information and, if you remain concerned, speak to your line manager or the Group Compliance team.

How we do business continued

Gifts, hospitality and entertainment

In the normal course of business, you might give or receive gifts or hospitality – for example, you might pay for a business lunch or receive a goody bag at a trade show. Gifts and hospitality of this nature are a positive way of building good business relationships with our customers and suppliers.

However, you must never give or receive gifts or hospitality where they are being used to unduly influence or reward the recipient or to gain a business advantage. You must never give or receive gifts or hospitality that could affect either party's impartiality or influence someone to perform their role improperly – for example, by making a decision they would not otherwise make. If the gift or hospitality appears to place somebody under an obligation, then it is not acceptable. You must never directly ask for a gift or hospitality.

All gifts and hospitality must be recorded in your site's Gifts & Hospitality Register, and you must obtain approval from the Finance Director of your business (or the Manager of your regional office) before giving or receiving any hospitality (either a single event or sequence of events), or gifts where the cost exceeds the amount set out in the Anti-Bribery and Anti-Corruption Policy. The giving or receiving of cash or cash-equivalent gifts such as gift certificates or vouchers is never acceptable.

The frequency of the gift-giving should also be considered. Even a gift of low value but given or received frequently could be seen as an undue influence and would not be acceptable.

Before giving or receiving any gift or hospitality, you should ask yourself these four questions:

- Could it be seen as being intended to influence a business decision?
- Is it prohibited by local laws or this Code?
- Does the value or nature of the gift/hospitality mean I feel uncomfortable about accepting?
- Does the value or nature of the gift/hospitality mean that I need approval before I offer (or accept) it?

If the answer to any of these questions is 'yes', you must not give or receive the gift or hospitality, and you should seek guidance from your line manager or a member of the Group Legal team.

For further guidance, you should:

- read the Anti-Bribery and Anti-Corruption Policy;
- read the Whistleblowing Policy;
- read the Conflict of Interests Policy;
- read the Business Travel Policy.





How we do business continued

Charitable donations

Charitable donations are an important part of our commitment to supporting the communities in which our employees and customers live and work. We may donate time and money to a variety of local charities.

We only make charitable donations to registered or otherwise reputable bodies. We do not support unregistered charities, and it is prohibited to make charitable donations that may contravene our Anti-Bribery and Anti-Corruption Policy – for example, if the donation could influence, or be seen to influence, the outcome of a transaction or decision relating to our business (e.g. a pending bid or contract). It is also important to ensure that donations are not made to charities that conflict with our values.

We never contribute to or sponsor organisations where a customer or potential customer is involved, or where we have a current business bid or deal outstanding. We never sponsor any activity in which a foreign public official has an interest.

Charitable donations must be given and received openly and without any attempt to mislead or hide their nature, value, purpose, or the identity of the giver or recipient. Donations must only be made in line with the procedures and limits as specified in our Delegation of Authority Policy.

It is our policy not to make political donations of any nature – either from the company, from employees on behalf of the company, or from third parties representing the company. We do not give money, goods, sponsorships or subscriptions, or anything of value to any political party or affiliated group.

You are free to make charitable or political contributions in your personal capacity, but you must ensure that personal funds are not used as a means of avoiding compliance with our policy (regardless of whether any reimbursement is sought from the company). Such contributions must not be reclaimed as personal expenses.

If you have any questions regarding our policy on charitable or political donations, please contact the Company Secretary or Group Legal team.

For further guidance, you should:

- read the Anti-Bribery and Anti-Corruption Policy;
- visit the Payroll Giving + page on SharePoint;
- read the Delegation of Authority Policy.

Q&A

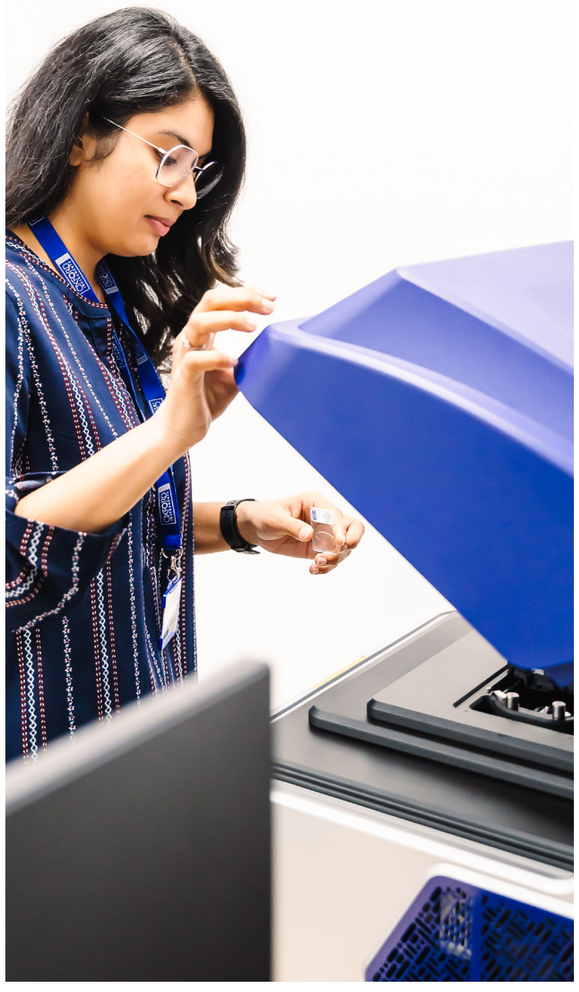
Am I allowed to organise a fundraising event at work?

Yes, employees are welcome to organise fundraising events for charitable causes for registered or otherwise reputable bodies. However, all events must be approved by your relevant HR team and comply with company policies.





How we do business continued



Conflict of interests

A conflict of interest arises when the personal interests, relationships, or activities of an employee (or anyone acting on our behalf) interfere, or appear to interfere, with their ability to act in the best interests of the business.

Conflicts of interest may, on occasion, arise in our business. For example, if we employed or did business directly with a member of your family, or if we entered a business transaction involving a company which you or a member of your family owns or controls. A conflict of interest could also arise if an employee were in a personal relationship outside of work with a direct report, as this could affect their impartiality in performance evaluations and promotions.

Personal conflicts of interest should be avoided. Where it is not feasible to eliminate the conflict of interest, transparency is fundamental to minimising the risk of improper behaviour or the perception of improper behaviour. You must be open and honest with us about any circumstance where a conflict of interest could arise.

If you identify a potential conflict of interest anywhere within our business, you should consult the Conflict of Interests Policy and discuss it with your line manager or your local HR team as soon as possible.

If you feel these methods are inappropriate for the situation which is causing you concern, you can contact Safecall, a fully confidential and independent whistleblowing service. Contact details are available on SharePoint, in our Whistleblowing Policy, and on notice boards on company sites.

For further guidance, you should:

- speak to your line manager or local HR team;
- read the Conflict of Interests Policy;
- read the Anti-Bribery and Anti-Corruption Policy;
- read the Whistleblowing Policy.

Q&A

We are looking for a new supplier and my wife owns a company that supplies exactly what we need. Do I need to clear this in advance with anyone before we buy from them?

Yes, there is a potential conflict of interest here, as your wife is connected to you and may benefit from this arrangement. You must disclose all relevant information to your line manager, who will then consider whether purchasing from your wife's company is in our best interests.

How we do business continued

Fair competition

We believe in fair and honest competition and are committed to complying with all applicable anti-trust and competition laws. Our Fair Competition Policy sets out our expectations in this area.

Breaching competition law is a criminal offence in most countries where we operate and could result in large penalties for the company, as well as criminal liability for the individuals involved.

You must:

- never exchange or seek to obtain commercially sensitive information from third parties, particularly our competitors. Commercially sensitive information includes information regarding prices, customers, territories, sales volumes, ongoing bids, terms and conditions of sale, product development or design, costs or project margins, or any other price-sensitive information;
- never engage in restrictive trade practices or improper collaboration with other companies, such as price-fixing, bid-rigging, or agreeing to allocate customers or markets; and
- immediately leave any discussion or meeting where anti-competitive discussions are taking place and promptly inform your line manager and the Group Legal team.

If at any time you suspect or become aware of a breach of our fair competition guidelines, you should immediately inform your manager, your local HR team, the Group Legal team, or the Group Compliance team.

For further guidance, you should:

- read the Fair Competition Policy and associated FAQs on SharePoint;
- read the Anti-Bribery and Anti-Corruption Policy;
- read the Whistleblowing Policy.

Q&A

I'm at a trade show and one of our competitors has started to discuss the potential price increases that may result from new national product regulations that are soon to be imposed. Is this a problem?

Yes, discussions between competitors that include commercially sensitive information such as pricing could be unlawful. You should refuse to engage in such discussions, leave the conversation, and promptly report the incident to your line manager and the Group Compliance team at compliance@oxinst.com



How we do business continued

Trade compliance

As a global, export-driven company, we are committed to complying with all applicable national and international regulations, including embargoes, sanctions, import and export controls, tariffs and customs, and anti-money laundering regulations.

At the company level, consequences can include substantial fines. At a personal level, misconduct will necessitate disciplinary action, and employees could face criminal prosecution if they have broken laws.

It is essential that you know the final destination of our products as well as the intended use, and that you remain vigilant about potential breaches of the law.

You must:

- respect and comply with our Sanctions Policy, Export Controls Policy, Customs and Tariff Policy, and local processes and procedures designed to comply with these policies – you can find copies of the relevant policies on SharePoint and should consult your local trade compliance manager for support;
- check with your local trade compliance manager whether items are controlled or whether an export licence is otherwise required (for example, based on end-use controls) and if it is, ensure that no export takes place without following the required process;
- ensure those exports requiring a licence are properly documented and if items sent are controlled, recipients are made aware of their controlled status;
- ensure that due diligence is carried out before entering into a transaction that potentially involves a sanctioned country, entity or person;
- ask for help if you have any doubts about how to comply with requirements – please consult your local trade compliance manager for support in the first instance; and
- report any suspicions of non-compliance in accordance with our Whistleblowing Policy.

For further guidance, you should:

- speak to your local trade compliance manager or to the Group Compliance team at compliance@oxinst.com, or to the Group Legal team;
- read the Global Sanctions Policy;
- read the Export Controls Policy;
- read the Customs and Tariff Policy.



How we do business continued

Integrity and accuracy of business records

As a global company operating across multiple jurisdictions, it is essential to record all our business dealings – from sales transactions and tax returns to supply agreements and employee files. Record-keeping is critical to ensuring compliance with our legal obligations, such as anti-bribery and anti-corruption laws, and helps us to manage our finances and operations.

The records we keep must always be accurate and complete, and we must retain them for as long as we are legally required to do so in each country in which we operate. Records should be completed with integrity and never with false or misleading information. You must follow all applicable legal requirements when disposing of any of our records.

Expenses

From time to time, you may incur expenses as part of your job. It is your responsibility to ensure that costs are reasonable and that any expenses claim complies with the local expenses policy for your site or business.

If you need to make an expenses claim, you must retain and submit appropriate evidence such as receipts. These should be submitted promptly.

If you are unsure about the rules for claiming expenses or about how you should complete an expenses claim, please read your local expenses policy. Any attempt, knowingly or falsely, to claim expenses in breach of these policies may result in disciplinary action.

For further guidance, you should:

- refer to your local expenses policy;
- speak to your line manager.



Q&A

I've discovered some errors in a record, but I don't want to get my colleague into trouble. What should I do?

If you find an error in a record, you should notify your line manager or the relevant department to ensure that the error is addressed appropriately and does not reoccur.

How we do business continued

Tax

Conducting business in an ethical manner includes considering how we deal with tax authorities.

Tax evasion is the unlawful act of not paying taxes, typically by submitting false information or failing to report taxes owed to the appropriate authorities. Examples include underreporting income, inflating expenses, falsely claiming deductions, and hiding taxable assets. We take a zero-tolerance approach to the facilitation of tax evasion, in any country.

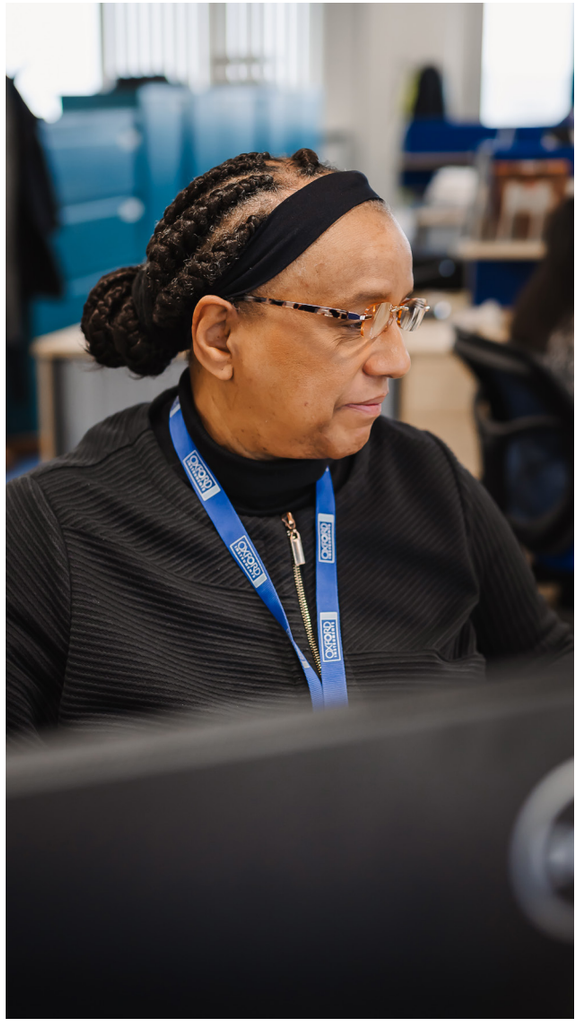
Tax evasion is a criminal offence and can have serious legal consequences for both the individual responsible and for the business. As an employer, if we fail to prevent our employees and those working for us from facilitating tax evasion, we can face criminal sanctions including an unlimited fine. We could also be excluded from tendering for public contracts and suffer damage to our reputation.

You must always follow our Anti-Facilitation of Tax Evasion Policy. If you are ever in doubt about whether something you have been asked to do could result in evading tax, you should seek advice from your local Finance team or from the Group Head of Tax.

If you ever suspect tax evasion in our business dealings, you must report it to your line manager or by following the procedure set out in our Whistleblowing Policy.

For further guidance, you should:

- contact the Group Compliance team at compliance@oxinst.com;
- read the Anti-Facilitation of Tax Evasion Policy;
- read the Whistleblowing Policy.



Q&A

A customer has asked me to change the description of the services we provided on an invoice in a way that would obscure the nature of the services provided. They've also requested that payment is made to a country different from where they conduct business. Should I do what they have asked?

No – this is a potential "red flag" scenario and should be reported promptly to your manager or to a member of the Compliance team at compliance@oxinst.com. Alternatively, you can follow the procedure set out in our Whistleblowing Policy. Other potential "red flag" scenarios include a third party requesting payment in cash or refusing to provide an invoice or receipt for a payment made; a third party requiring the use of another party that is not typically used by or known to us; or a third party we have provided services to requesting that their invoice is addressed to a different entity.

How we do business continued

Inside information and share dealing

As a listed company on the London Stock Exchange, we must comply with laws relating to inside information and share dealing.

Inside information is information that is confidential within Oxford Instruments, is precise in nature, is not generally available, and could have a significant impact on our share price if it became public. Examples include the details of our financial results, trading updates, acquisitions or disposals of businesses, or other commercial developments.

To use inside information for dealing in our shares, or encouraging others to do so, is market abuse and a criminal offence.

Inside information and the risk of insider trading applies to you as an employee and to those connected to you, for example your partner, children, family relatives living in the same house, or a business in which you have a controlling interest. Employees who have been formally notified by the Company Secretary are subject to further restrictions under our Share Dealing Policy.

For further guidance, you should:

- contact the Company Secretary;
- read the Share Dealing Policy;
- read the Conflict of Interests Policy.



Q&A

Can I tell my family and friends about Oxford Instruments' financial performance ahead of the publication of the half-year or full-year results?

No, this could constitute market abuse and could be a criminal offence. It may also be a breach of your duty to the company. You must not share inside information with family members, friends, or anyone inside or outside of Oxford Instruments unless you have prior written approval. You must not deal, nor encourage another person to deal, in the shares of Oxford Instruments (or any other listed company) based on inside information.





How we do business continued

Product quality and safety

Any non-conformance with our quality or safety standards, however minor, could be extremely damaging for us and our customers. Counterfeit, fraudulent and suspect items (CFSI) threaten the health and safety of consumers, diminish the trustworthiness of products, and harm the economic growth of legitimate businesses.

We take a zero-tolerance approach to counterfeit, fraudulent and suspect items within our supply chains, and we are committed to preventing CFSI from entering our facilities, processes, or products. To ensure our products are of the highest quality, we only purchase materials directly from the Original Equipment Manufacturers (OEMs) or from authorised distribution channels. OEMs produce goods that meet the original specifications and are rigorously tested and certified to meet safety standards.

We ensure that everyone within the company who is involved in the purchasing of materials is provided with training on the potential for CFSI to occur in the supply chain. All our products are manufactured in accordance with stringent processes.

Supply chain partners

The cooperation of our supply chain partners is essential to maintaining the highest standards for all the goods and services we supply. We expect our suppliers to adhere to the requirements set out in our Supplier Quality Manual (SQM) in respect of quality, performance, and compliance with international standards and regulations.

Suppliers are required to establish and maintain a quality assurance process for the products they manufacture and services they provide to us. These processes must comply with applicable international legislation and with the general requirements of ISO 9001 as a minimum.

Suppliers must also meet or exceed the ethical standards set out in our Code of Conduct for Representatives and Suppliers.

Before appointing any new supplier, we complete appropriate due diligence checks to understand their financial and reputational history. Suppliers are asked to complete our comprehensive Environmental, Social, and Governance (ESG) Questionnaire, which includes questions about their codes of conduct, carbon footprint, and their policies relating to human rights, anti-bribery, and the environment.

We undertake periodic due diligence reviews of our key suppliers and we have developed a supplier management process to support greater consolidation of our supplier base.

For further guidance, you should:

- speak to your line manager, the Head of Quality, or a member of the Group Legal team;
- read the Supplier Quality Manual (SQM);
- read the Code of Conduct for Representatives and Suppliers;
- read the Counterfeit, Fraudulent and Suspect Items (CFSI) Policy, and, if necessary, our Whistleblowing Policy.



Q&A

I would like to engage a new supplier but don't have time to complete the due diligence process. Can I engage the supplier and undertake due diligence later?

No. All new suppliers must go through our due diligence process before we start to work with them. The process is straightforward and should not take a long time to complete.

How we do business continued

Conflict minerals

We are committed to sourcing our supplies responsibly and to supporting global efforts to eliminate the use of minerals sourced from mines that fund conflict (known as "conflict minerals").

Conflict minerals are defined as:

- cassiterite (from which tin is extracted);
- columbite-tantalite, also known as coltan (from which tantalum is extracted);
- wolframite (from which tungsten is extracted); and
- gold.

These minerals, also known as "3TG" (tin, tantalum, tungsten, and gold), are frequently mined in conditions of armed conflict and human rights abuses and are sold or traded by armed groups. This, in turn, funds ongoing violence.

Any connection between the materials used in our products and armed violence or human rights abuses is unacceptable. We strive to procure supplies which are free from conflict minerals – we undertake due diligence on our key suppliers and expect those key suppliers to conduct due diligence on their own supply chains.

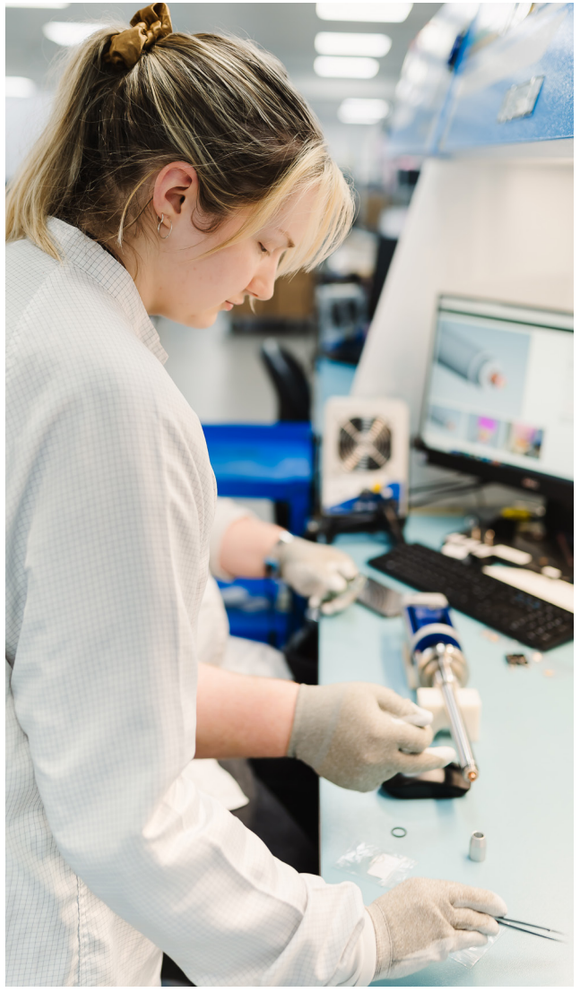
For further guidance, you should:

- read the Supplier Quality Manual (SQM);
- read the Code of Conduct for Representatives and Suppliers;
- contact the Group Head of Quality.

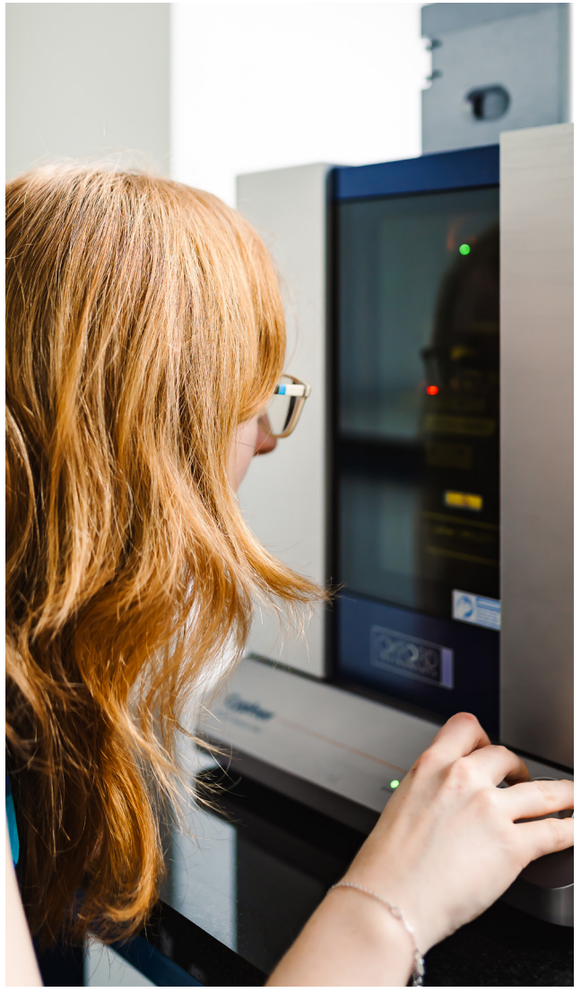
Q&A

Should we just choose not to source from conflict-affected areas?

No. The intention is to source responsibly, whether from a conflict-affected or high-risk area or elsewhere. We should always be aware of all parties in our supply chain and undertake appropriate due diligence, regardless of their location.



How we do business continued



Environment

Our products and services support the shift towards a greener economy, with applications in renewable energy, environmental protection, and the development of more sustainable materials. We are proud of the positive impact we make on the world, and we take seriously our responsibility to minimise our own environmental footprint.

We have set an ambitious target to achieve net zero emissions in our own operations (Scopes 1 and 2) by 2030, and sooner if we can. The vast majority (well over 90%) of our carbon footprint is generated through our supply chain and our customers' use of our products (Scope 3). We are committed to making a significant reduction in our Scope 3 emissions by 2030 and to reaching net zero across all three scopes by 2045.

To help minimise our environmental footprint, we strive to:

- use energy resources as efficiently as possible;
- use green or renewable energy sources wherever possible; and
- invest in energy-saving technologies where they prove appropriate.

For further guidance, you should:

read the Environmental Policy.

Q&A

What can I do to help to reduce our environmental footprint?

You can help to support our efforts to reduce our environmental footprint by turning off lights, computers and monitors when not in use, minimising your paper usage, and recycling waste material wherever possible.

Safeguarding our assets



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Safeguarding our assets

Confidentiality and intellectual property

Confidential information is information that you have access to as part of your role at Oxford Instruments, that is not generally known to the public, and that is sufficiently sensitive that loss or unauthorised disclosure or access could result in harm to the company. Examples of confidential information include trade secrets, details of our inventions, ideas and designs, processes and know-how, technical information, unpublished financial data, customer and supplier records, and information about our business plans.

Commercially sensitive information is one of our most important assets. It is essential to safeguard this information and ensure it always remains confidential.

You are responsible for protecting information and assets in your care. Confidential information must be kept securely, only kept for as long as needed, and never used for anything other than its proper purpose.

If you become aware of any actual or potential unauthorised disclosure of our confidential information, or if you have concerns relating to a request to provide company information to a third party, please contact your line manager and Group Legal team immediately.

For further guidance, you should:

- read the 'Inside information and share dealing' section on page 14;
- speak to your line manager or the Group Legal team;
- read the Data and Document Retention Policy.



Q&A

I'm going to a conference, and I'd like to talk about the new techniques we have created whilst developing some exciting new products that have not been launched yet. Am I allowed to do this?

No, you must not discuss publicly anything related to our research and development programme, or products in development. These are our intellectual property and confidential information, and any disclosure could prevent us from securing valuable rights over them in the future, such as patents.

A customer has sent me some images of their product in use, and I want to use these in our marketing materials. Do I need their permission?

Yes. We respect the intellectual property of all third parties and failure to seek their consent may result in legal action being brought against us for infringement of that intellectual property.

Safeguarding our assets continued

Data protection

To operate effectively, we need to collect and retain certain personal data about our employees, customers, suppliers, and other third parties. Personal data is information from which an individual can be identified – examples include names, contact details, or bank account details.

Failure to comply with local data protection laws can result in significant penalties. We have implemented global and local data protection policies and procedures that set out how we will process data, which can be found on SharePoint.

You must only collect personal data for legitimate business purposes, and you must keep it secure against loss and misuse. You must delete personal data when it is no longer required, in line with our retention policies.

If you become aware that any personal data has been lost or someone has disclosed or accessed any personal data without authorisation, you should contact Group Legal immediately for advice at privacy@oxinst.com.



For further guidance, you should:

- read the Global Data Privacy Standard;
- read the Data and Document Retention Policy;
- refer to your local data protection policies and privacy notices.

Q&A

I accidentally sent an email to the wrong person which contained some salary and bonus information about members of my team. Do I need to do anything?

Yes, you must immediately try to recall the email and inform the Legal and HR teams. Speed is critical when there has been a data breach.

Safeguarding our assets continued

Data security and information management

The security of our data and IT systems is critical to protecting our business.

All systems, including hardware, software, and devices, should be used responsibly and in accordance with our IT policies. Our policies are intended to help you to manage risk and enable you to safely use the systems you need to do business.

We all have a role to play in keeping our IT systems safe. You must:

- password lock your device or log off when leaving it unattended;
- never share passwords;
- be alert to scams such as phishing and report any suspicious emails or strange requests. If you are ever unsure whether an email is genuine, you should report it using the 'Report Phishing' button in Outlook 365 or contact your local IT team for advice; and
- report any theft or loss of devices or data immediately to your local IT team, Information Security team and Legal team.



For further guidance, you should:

- read the Information Security policies;
- read the Acceptable Use policies;
- read any applicable data protection policies.

Q&A

I received an email that looks like it's from my Managing Director asking me to help with a confidential project. This is unusual and it's not written in the way they usually write, but I don't want to question them as they are the boss. Should I just do as they ask?

No, you should report the email as phishing and check with the IT team and your line manager as to whether the email is genuine. Phishing emails are becoming more sophisticated and realistic – please stay alert to help keep us all safe.

Safeguarding our assets continued

Use of artificial intelligence

AI has the potential to transform the way we work, helping us solve problems faster, automate routine tasks, and focus more of our time on activities that create value for our customers and business. We encourage employees to explore and embrace new technologies, identify opportunities to improve efficiency and productivity, and share their learning and best practices with colleagues.

However, innovation must be balanced with responsibility. As AI technologies continue to evolve, we are committed to using them in a safe, ethical and secure manner that reflects our values and protects our people, customers and wider society.

To support responsible adoption of AI, we provide policies, training and guidance that explain how AI can be used safely and effectively at Oxford Instruments. When using AI, you must always follow our key principles:

- thoroughly review and validate AI-generated content for accuracy, quality and potential bias;
- exercise appropriate human judgement when using AI outputs – you must never use AI to make or materially influence decisions without appropriate human oversight; and
- protect confidential information, intellectual property and personal data in accordance with our policies.

For further guidance, you should:

- visit the AI Hub on SharePoint;
- read the AI Policy;
- read the AI Glossary on the AI Hub on SharePoint;
- read the Whistleblowing Policy.





Q&A

Am I allowed to use ChatGPT for work purposes?

No, you are only permitted to use the AI tools that have been pre-approved as safe to use at Oxford Instruments.

Safeguarding our assets continued

Communications

It is essential for our reputation that our communications, both internally and externally, are accurate, clear, and consistent.

Media and other external communications must be managed in a coordinated way, by authorised spokespersons, and the messages must be consistent and aligned with our policies. Company information which is confidential and proprietary should never be shared with anyone outside Oxford Instruments.

All corporate press releases and other types of formal publicity must be approved by the Group Director of Communications before being added to the company website or distributed to the press. Any press release containing financial information must also be approved by the Chief Financial Officer.

If you are ever contacted directly by the media for corporate information or a statement, you should direct the enquiry to the Group Director of Communications. You should never communicate on behalf of Oxford Instruments without prior written approval.

Uncontrolled or unauthorised media commentary can cause reputational damage. The only authorised spokespersons for Oxford Instruments are:

- the Chief Executive Officer (CEO);
- the Chief Financial Officer (CFO);
- the Chief HR Officer (CHRO);
- the Chair of the Board of Directors; and
- the Group Director of Communications.

Other spokespersons can only be authorised by the above.

For further guidance, you should:

- read the Group Media & Communications Policy;
- read the Global Social Media Policy;
- read the Working at Oxford Instruments Policy;
- read your local data protection policy;
- read the Share Dealing Policy.



Q&A

I've been asked to give an interview to the Financial Times about how our part of the business is doing. Is it OK to go ahead if I check with my Managing Director?

No. Even where information shared with a journalist relates only to one part of the company, this can still have a significant reputational or financial impact for Oxford Instruments and may lead to unintended consequences if not managed properly. You must refer the enquiry to the Group Director of Communications, who will assess the opportunity and liaise with the relevant colleagues to manage it in a controlled way.

Safeguarding our assets continued

Use of social media

We use social media to reach a range of audiences. Through social media we can communicate directly with our customers, provide support for our products and services, and demonstrate our positive impact on the world, which shapes how Oxford Instruments is perceived. However, social media represents a major risk if it is not used in a considered way.

Corporate use of social media

You must be authorised to use our corporate social media accounts and to represent Oxford Instruments to the public as part of your job role. This authorisation will be provided by the Head of Marketing Communications - Centre of Excellence or the Group Director of Communications. You may be required to undergo training, and certain requirements and restrictions may be imposed regarding your activities.

Only authorised accounts should be used to publish messages and respond to other users of the social media channel, and these should be correctly branded with the relevant logos in accordance with our visual identity brand guidelines. If you wish to create a new corporate account, you must first consult the Group Director of Products and Markets, the Group Director of Communications or the Head of Marketing Communications - Centre of Excellence.

Personal use of social media

Occasional personal use of social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your employment responsibilities or productivity, and complies with our Global Social Media Policy.

Please remember when posting to personal social media channels that you continue to have responsibilities to the company outside working hours. We expect you to uphold our values in your online presence: we are inclusive, innovative, trusted, and purposeful - inclusion and trust are particularly important in this context. You must always be respectful of others in your interactions online.

When using personal social media to engage on matters relevant to Oxford Instruments, you should make it clear it is your own opinion you are expressing and not that of the company.

Prohibited use

You must not use social media to defame or disparage us, our staff or any third party, or to make false or misleading statements. You must not use social media to harass, bully, or unlawfully discriminate against anyone.

Posting comments about sensitive business-related topics such as our performance is strictly prohibited, and you must not do anything to jeopardise our trade secrets, confidential information, and/or intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media channel, unless expressly authorised to do so by the Group Director of Products and Markets, the Group Director of Communications or the Head of Marketing Communications - Centre of Excellence.

For further guidance, you should:

- read the Global Social Media Policy;
- read the Global IT Policy - Infrastructure and Use;
- read the Group Media & Communications Policy;
- read the Global Instant Messaging Policy;
- read any applicable Acceptable Use policies.

Q&A

I want to post a comment in response to a news story I've read online about a field of technology we work in. Can I speak on behalf of Oxford Instruments?

No. When using social media to engage on matters relevant to Oxford Instruments, you must make it clear it is your own opinion you are expressing and not that of the company. You must not say anything that could disparage us or bring the company into disrepute.



Safeguarding our assets continued

Brand

The image we project as a company is an important part of how we do business. The brand name 'Oxford Instruments' is used by all our businesses globally to capitalise on our strong reputation and history. It represents the promise we make to our customers to provide world-leading high-technology solutions, information, and services.

The Oxford Instruments brand is one of the company's most important assets. It represents much more than just a logo or a colour palette. Knowing what it stands for and ensuring its place at the heart of the company is key to maximising its true value.

When our brand is being represented visually, there are identity guidelines and product styling guides you should follow, and templates you should use, to help reinforce the brand correctly and consistently. These are available via the Marketing Hub on SharePoint.

For further guidance, you should:

- visit the Marketing Hub on SharePoint;
- read the Group Media & Communications Policy.

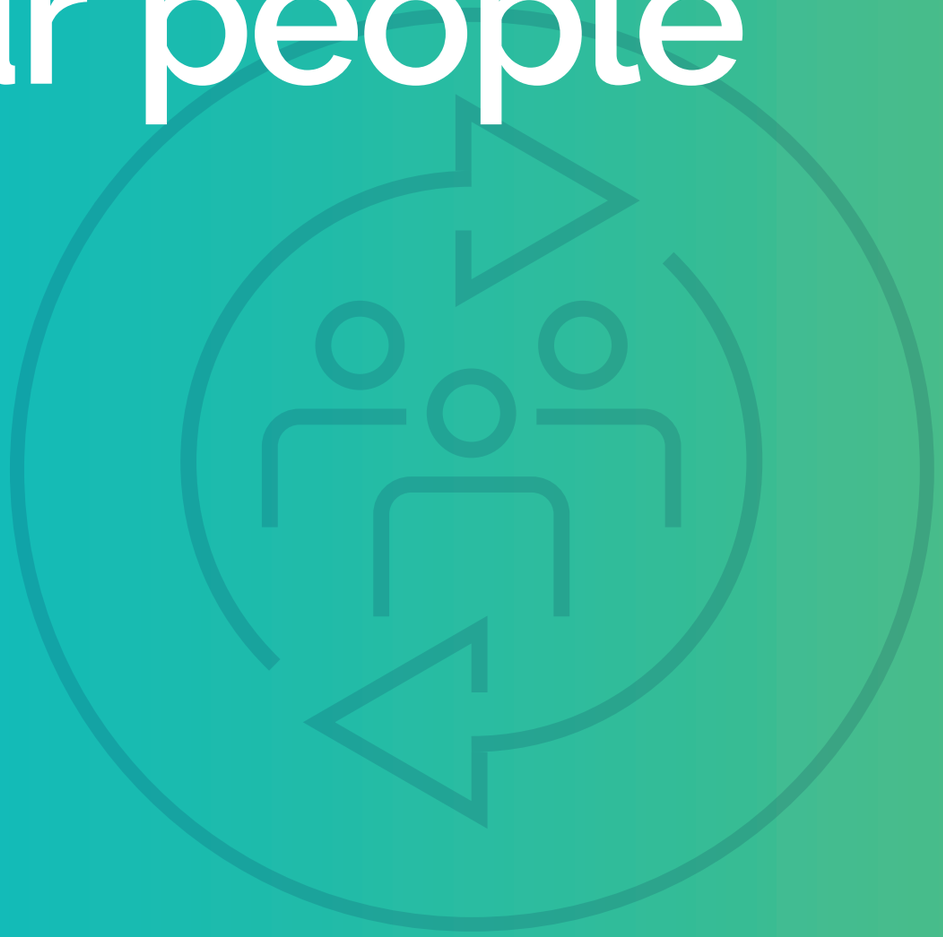


Q&A

I'm putting together a PowerPoint presentation to deliver to my business. Where can I find templates and logos?

Within the Marketing Hub on SharePoint, you will find a full collection of templates you can download and use.

Our people



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Our people

Equity, diversity and inclusion

Being inclusive is a core company value and is based on respect for the individual and creating a sense of belonging. We seek to develop and sustain a culture where difference is recognised, valued, and celebrated, and where everyone can contribute to their full potential.

We want to attract, recruit, and retain a diverse workforce. Our recruitment practices and development opportunities are inclusive by design, and we ensure that all candidates are evaluated based on their qualifications and performance.

Equity, diversity and inclusion is important for all our people and for society, but we recognise that we operate in more than 20 countries around the world in which the legislative frameworks and cultural landscapes vary hugely.

In each of the countries in which we operate, we aim to be ahead of the curve in our equity, diversity and inclusion targets and our working practices, but we will ensure that we are not in conflict with legislative frameworks.



Our annual Gender and Ethnicity Pay Gap Report can be found here: www.oxinst.com/corporate-content/gender-pay-report

For further guidance, you should:

- speak to your line manager or HR team;
- read the Global Equity, Diversity and Inclusion Policy;
- read the Global Human Rights Policy;
- read the Whistleblowing Policy.

Our people continued

Health and safety

Providing a healthy, safe, and productive working environment is a core focus for Oxford Instruments.

We strive to continuously promote a high standard of health, safety, and wellbeing for all employees, alongside others who may be involved in or affected by our activities. Our approach is based on identifying and controlling risk, which is supported at each company site by a structured health and safety management system.

We all share the responsibility of achieving safe working conditions. Relevant training is made available to you, and you must follow the guidance given to protect yourself and your colleagues. We are committed to engaging with you to continually review and improve health and safety in our workplaces.

We encourage you to use our SHIELD health and safety reporting portal to raise any concerns or observations you may have about health and safety. This platform can be found in the Health & Safety Hub on SharePoint and is accessible to employees and visitors.

We can then work together to take the actions needed to prevent recurrence and reduce the likelihood of further accidents.

If you feel these methods are inappropriate for the situation which is causing you concern, you may always contact Safecall, a fully confidential and independent whistleblowing service. Contact details are available on SharePoint, in our Whistleblowing Policy, on notice boards on company sites and at the end of this Code.

You can also raise any concerns by emailing the Group Compliance team at compliance@oxinst.com

For further guidance, you should:

- read the Health and Safety Policy Statement.



Q&A

I slipped on a wet floor but didn't fall or injure myself. Should I still report the incident?

Yes, you should always report near-misses like this. Reporting helps us control hazards before they cause injury.

If I witness a colleague getting injured but they choose not to report it, should I report it on their behalf?

Yes, it's important that all incidents are reported. Even if some time has passed, it's important to report the incident as soon as possible. You can still accurately log the details in SHIELD.

Our people continued



Human rights and modern slavery

We are committed to ensuring that slavery and human trafficking does not exist in either our business operations or our supply chain. We take a zero-tolerance approach to all forms of modern slavery and human trafficking, and we expect the same commitment from all those we engage with.

Training is available to help you recognise where there may be risks of modern slavery and human trafficking within the business and our supply chain. The Whistleblowing Policy should be used to report any concerns.

In the event of an allegation of slavery or human trafficking in our business or in our supply chain, we will investigate swiftly and thoroughly. We will not hesitate to terminate our relationship with the concerned party if the allegations are confirmed.

Our Modern Slavery Statement can be found on the Oxford Instruments website, https://www.oxinst.com/investors/sustainability/modern-slavery

For further guidance, you should:

- read the Global Human Rights Policy, which describes our commitment to creating an inclusive working environment in which everyone is treated with dignity and respect;
- read the Supplier Quality Manual (SQM);
- read the Code of Conduct for Representatives and Suppliers;
- read the Whistleblowing Policy.

Our people continued

Conduct in the workplace

We are committed to making Oxford Instruments the best place to work, with a supportive, enabling culture and fantastic development opportunities. Central to this is treating each other with respect.

We expect you to uphold the highest ethical standards in all your interactions and to always conduct yourself in a professional manner. All employees should be treated with courtesy, dignity, and thoughtfulness.

We expect all those working for us or on our behalf to uphold our values and not to engage in any behaviour that could be considered discriminatory, bullying, harassing, offensive, disrespectful, or inappropriate. Bullying or harassment against our people, including via social media, will not be tolerated.

To ensure a safe and professional work environment, you must not be under the influence of alcohol or drugs whilst at work. The use, possession, distribution, or sale of illegal drugs or alcohol on company property or whilst performing job duties is strictly prohibited.

Your conduct during business travel

You may on occasion travel nationally or internationally as part of your job. You are expected to maintain professional conduct at all times and refrain from behaviours that do not meet our standards, even if they are legal or acceptable locally in the country you are visiting.

If you have any concerns about workplace conduct, you should promptly report them to your line manager or HR team.

For further guidance, you should:

- read the Health and Safety Policy Statement;
- read the Code of Conduct for Representatives and Suppliers;
- read the Whistleblowing Policy.



Q&A

A colleague made an offensive and derogatory joke that made me feel uncomfortable. Should I say something?

Yes, it is important to speak out about inappropriate behaviour in the workplace. If you feel able to, you should raise this with your colleague professionally and constructively – for example, you could say, "I found that comment hurtful. Let's be mindful of our language." If the issue persists or if you are at all concerned, you should discuss it with your line manager or HR team. We take a zero-tolerance approach towards harassment and discrimination.

Contact us

We are committed to operating in an ethical, inclusive, and environmentally responsible manner, as set out throughout this Code.

All employees are expected to take responsibility for ensuring that the principles and standards set out in this Code are followed and upheld. It is important that you raise any concerns and challenge behaviour that is inconsistent with this Code. If you are in any doubt, you should always ask for help.

Safecall contact details

There are a number of ways you can raise concerns:

- you may wish to speak to your line manager first if you are unsure what to do in a particular situation;
- you may contact Safecall, a fully confidential and independent whistleblowing service. You can contact Safecall by telephone, by email, or via their website www.safecall.co.uk, in English or in your local language. Contact details are available on the website, on SharePoint, and on notice boards on company sites;
- you can also raise any concerns by emailing the Group Compliance team at compliance@oxinst.com;
- for any questions about this Code, you can contact the Chief HR Officer at CHRO@oxinst.com;
- for concerns of a legal nature, you can contact Group Legal at legal@oxinst.com; or
- if you feel the contacts listed above are inappropriate for the situation which is causing you concern, you may always contact the company's Senior Independent Director for advice and support at seniorindependentdirector@oxinst.com





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Last update: November 2026