

Code of Conduct for Representatives and Suppliers

Oxford Instruments ("OI") seeks to work with suppliers and representatives (e.g. sales agents, resellers, distributors, dealers, consultants, and third-party providers) who operate under principles that are consistent with those set out in OI's Code of Business Conduct and Ethics (<https://www.oxinst.com/CBCE>).

This Code of Conduct for Representatives and Suppliers ("Code of Conduct") complements OI's Code of Business Conduct and Ethics by setting out the basic requirements mandated for OI's representatives and suppliers concerning their responsibilities towards their stakeholders and the environment. As such, it applies to all OI's representatives and suppliers globally.

OI reserves the right to make reasonable changes to this Code of Conduct from time to time to capture changes in the law or in its internal compliance requirements.

In providing goods and/or services to and/or on behalf of OI, the representative/supplier hereby acknowledges and agrees:

Legal, statutory, regulatory compliance & UN Principles

- to comply with the laws of the applicable legal system(s) in which it operates;
- to ensure that all products and/or materials supplied to OI conform to agreed specifications and to global statutory and regulatory requirements for those products and/or materials (and to enforce the same standards within its supply chain);
- to apply the United Nations Guiding Principles on Business and Human Rights to all its business operations;

Respect for the basic human rights of employees & prohibition of child labour

- to promote equal opportunities for and treatment of its employees irrespective of gender, ethnicity, disability, religion, age, sexual orientation, gender identity, cultural background, country of origin, marital or civil partner status, socio-economic background, thinking style, political or religious conviction, family responsibilities, or sensitive medical conditions;
- to respect the personal dignity, privacy, and rights of each individual;
- not to make anyone work against their will or as a result of coercion or under threat of a penalty;
- not to employ workers under the age of 16;
- to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual or non-sexual harassment, or discrimination;
- to prohibit behaviour including gestures, language, and physical contact that is sexual, coercive, threatening, abusive, or exploitative;
- to prohibit physical or mental punishment and maintain proportionate disciplinary measures;
- to provide fair remuneration and to guarantee the applicable national statutory minimum living wage;
- to comply with the maximum number of working hours laid down in applicable laws;
- to refuse to arrange or facilitate the travel of individuals with a view to exploiting them;
- to recognise, as far as legally possible, the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions;
- to take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights;

Prohibition of corruption and bribery

- not to engage in or tolerate any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision-making in violation of law;

Health and safety of employees

- to take responsibility for the health and safety of its employees;

- to control hazards and take reasonable precautionary measures against accidents and occupational diseases;
 - to provide training and ensure that employees are educated in health and safety issues;
 - to set up or use a reasonable occupational health and safety management system according to ISO 45001 or equivalent;
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Conflict minerals & materials sourcing

- to procure materials which are free from conflict minerals and to support efforts to eliminate the use of conflict minerals;
 - to report to OI any use of 3TG (tin, tungsten, tantalum, and gold) in its products in any quantity;
 - to establish a due diligence programme and to investigate the source of any 3TG in any products and to flow this requirement down throughout its supply chains;
 - to ensure components and/or materials supplied to OI are 'new' (i.e. are not reconditioned or re-manufactured) and sourced only from original equipment manufacturers or authorised suppliers;
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Environmental protection

- to act in accordance with the applicable statutory and international standards regarding environmental protection;
 - to minimise environmental pollution;
 - to minimise climate change impact including reducing greenhouse gas (GHG) emissions, to monitor and reduce waste and water consumption, to minimise any potential biodiversity impacts, and to make continuous improvements in environmental protection;
 - to set up or use a reasonable environmental management system according to ISO 14001 or equivalent;
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Supply chain & risks

- to use reasonable efforts to promote compliance with this Code of Conduct in its supply chain;
 - to comply with the principles of non-discrimination regarding supplier selection and treatment; and
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Whistleblowing

- that if it has a genuine concern about an action or behaviour that is inconsistent with OI's ethical standards, it will report it 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, and is available anonymously. Further information and full contact details are available via this link: <https://www.safecall.co.uk/en/clients/oxinst>
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ESG questionnaire and non-compliance

OI regularly engages with its representatives and suppliers to improve the environmental and social performance of both OI and its representatives and suppliers.

In the case of environmental or social non-compliance, or breach of this Code of Conduct, OI will take appropriate action. In the first instance, we may engage with the representative or supplier to remediate the non-compliance or breach. In more extreme cases, the representative or supplier contract may be terminated.

From time to time, OI may request a supplier completes its 'ESG Questionnaire' that explores aspects such as health and safety, modern slavery, and GHG emissions. The ESG Questionnaire helps us further understand the environmental and social performance of our supply chain and to identify any areas of improvement.

In providing goods and/or services to and/or on behalf of OI, the representative/supplier hereby acknowledges and agrees to promptly complete OI's ESG Questionnaire when requested to do so and to provide OI with any information it may reasonably require to fulfil its commitment to environmental and social performance.