



Code of Ethics Policy

Incap Electronics UK & Slovakia requires that all employees accept by the fundamental principles of ethical behaviour outlined in the code of ethics below in everything they do in performing their duties.

1. Honesty

Incap Electronics is committed to the highest standards of ethical conduct in all that it does. The Company complies with all applicable legal and regulatory requirements governing business relationships and international trade, including relevant export and import control regulations. Incap Electronics believes that honesty and integrity engender trust and it conducts its business in accordance with all the applicable laws and regulations of the countries in which it does business and requires that its employees, agents and advisers also comply with such laws.

2. Prohibition of Bribery and Corruption and Extortion

Incap Electronics does not offer, promise, give, demand or accept bribes or other unethical inducements, including extortion, in order to obtain, retain or give business or other advantage and takes all reasonable measures within its power to ensure that its employees, advisers and agents follow the same practice.

3. Competition

Incap Electronics competes fairly and vigorously in its market sector and it does not engage in, nor is it a party to, any agreements, business practices or conducts that, as a matter of law, are anticompetitive or may be construed as participation in trade or associated cartels.

4. Integrity in Business Behaviour

Incap Electronics expects its employees to act with integrity at all times. Incap Electronics employees who have access to privileged information must not use it to achieve personal gain for themselves or others and no employee shall engage in personal activities or pursue financial or business interests



which might give rise to, or give the appearance of, conflicts of interest with Incap Electronics or which might compromise their ability to meet the responsibilities of their job.

5. Customer, Supplier and Sub Contractor Relationships

Incap Electronics seeks to provide its customers with products and services which meet or exceed their requirement, to respond quickly to changing customer demand and to seek to continuously improve product quality, value and delivery times. Incap Electronics believes in working in partnership with suppliers and subcontractors to meet its customers' expectations and ensure quality, value and timelessness of delivery. Payment to suppliers and subcontractors will be made promptly within the agreed terms of business.

6. Employees

Incap Electronics recruits, selects and promotes employees on the basis of their qualifications, skills, aptitude and attitude and treats all its employees with respect and dignity. Harassment and/or bullying are unacceptable.

7. Health and Safety

Incap Electronics is committed to conducting all its activities in a manner which achieves the highest predictable standards of health and safety.

8. Environment

Incap Electronics is committed to a proactive policy on environmental issues. To meet this commitment, an Environmental Management Systems (EMS) is operated and certified in accordance with ISO 14001 requirements.

9. Reporting and Internal Controls

Incap Electronics records all business transactions accurately, prudently and transparently in compliance with its accounting standards and utilizes appropriate internal controls to ensure that it is managed effectively and that the reported results are accurate.



10. Modern Slavery and Human Trafficking

One of our most basic beliefs is that everyone should have the opportunity to work. InCap Electronics complies with the applicable employment laws and our obligation is to ensure fairness in the hiring and advancement of all employees, both permanent and temporary without discrimination. All of our staff have a personal responsibility for maintaining a respectful work atmosphere, free of abusive or unprofessional conduct. Every employee is expected to respect other people and treat them with dignity.

Our commitment to respect in the workplace includes our full support for international efforts to promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking. We also expect commitment to these principles from all organisations with which we do business and will not support or do business knowingly involved in slavery or human trafficking.