

## Rakon Group: Slavery and Human Trafficking Statement

### Modern Slavery Act 2015 (UK)

Under the Modern Slavery Act 2015 (UK), companies that operate within the United Kingdom but have supply chains outside that country are required to have a Slavery and Human Trafficking Statement. Such Statements are intended to help improve labour standards in supply chains through increased transparency.

Rakon is committed to maintaining high labour standards in all companies within the Rakon Group, and to respecting the human rights of employees. It does not permit exploitative practices such as those the Act is intended to address. Rakon policies prohibiting exploitative practices are actively maintained and reinforced through the Group's management system.

### About Rakon Group

Rakon UK Holdings Limited and Rakon UK limited are wholly owned subsidiaries of Rakon Limited which is a New Zealand-based, publicly listed company that designs and manufactures high technology frequency control solutions. A complete list of Rakon Limited's subsidiaries is set out below:<sup>i</sup>

Entity	Principal Activities	Country	Relationship
Rakon America LLC	Marketing support	USA	Subsidiary (100% interest)
Rakon Singapore (Pte) Limited	Marketing support	Singapore	Subsidiary (100% interest)
Rakon Financial Services Limited	Financing	New Zealand	Subsidiary (100% interest)
Rakon International Limited	Marketing support	New Zealand	Subsidiary (100% interest)
Rakon UK Holdings Limited	Holding company	United Kingdom	Subsidiary (100% interest)
Rakon UK Limited	Research and Development	United Kingdom	Subsidiary (100% interest)
Rakon France SAS	Research & Development Manufacturing and Sales	France	Subsidiary (100% interest)
Rakon India Private Limited	Manufacturing and Sales	India	Subsidiary (100% interest)
Rakon HK Limited	Holding company	Hong Kong	Subsidiary (50% interest)
Rakon Investment HK Limited	Holding company	Hong Kong	Subsidiary (100% interest)
Rakon Crystal Electronic International Limited	Marketing support	China	Subsidiary (100% interest)

Joint venture partners and associated companies are:<sup>ii</sup>

Entity	Principal Activities	Country	Relationship
Chengdu Timemaker Crystal Technology Co Limited	Products and services to frequency control products industry	China	Associate (37% interest) Supplier to Rakon

### Rakon Policy on Labour Standards

The Rakon Business Code of Conduct (**Code**) contains strong commitments to labour standards. These commitments are set out in Part E of the Code. The Rakon Supplier Code of Conduct requires suppliers to maintain and to practise high labour standards.

Standard E.1 (“*Freely Chosen Employment*”) deals directly with issues of slavery and trafficking and provides that:

*Forced, bonded or indentured labour; involuntary prison labour; slavery or trafficking of persons is not to be used. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. All work must be voluntary, and employees should be free to leave work at any time or terminate their employment. Employees shall not be required to hand over government-issued identification, passports or work permits as a condition of employment, however employees will be required to show proof of eligibility to work in the applicable country.*

A full copy of the Code can be found at <https://www.rakon.com/investors/corporate-governance>

The Rakon Supplier Code of Conduct together with the Rakon Business Code of Conduct represents a total supply chain initiative. Compliance with the Rakon Supplier Code of Conduct is required under Rakon’s Standard Terms of Supply. Rakon maintains a Whistleblowing (Protected Disclosure) Policy.

### Steps taken to Ensure Compliance

Rakon’s Code sets a high standard of conduct. Rakon believes compliance with the Code and the Supplier Code of Conduct will also result in compliance with the Act and therefore does not have stand-alone processes for addressing slavery and human trafficking.

Relevant components of Rakon’s management systems are summarised in Part F of the Code, and are as follows:

1. Company commitments to social and environmental responsibility. Rakon’s 2024 Annual Report records Rakon’s commitment to:
  - Fostering health and safety and well-being practices and reporting across its global operations for health of workforce and safe workplaces
  - Regular employee engagement surveys for global teams
  - Review and enhancement of Rakon’s Supplier Code of Conduct to support ethical supply chain and focus on quality, environment, labour practices, management systems and governance
2. Identified representatives are responsible for implementation and review.

3. Processes for ensuring compliance with the requirements of applicable laws, of customers, and of the Code.
4. Commitments to integrity in customer and supplier relations.
5. Risk assessment, risk management and controls to ensure regulatory compliance and manage identified risks.
6. Performance objectives, targets and implementation plans, and periodic assessment of performance against those objectives.
7. Training for managers and employees.
8. Processes for communicating information about company performance, practices and expectations.
9. Ongoing processes for employee feedback and participation.
10. Periodic self-evaluations.
11. Processes for timely correction of any identified deficiencies.
12. Documentation and records to ensure compliance.

## Declaration

I, Sinan Altug confirm that during the 2023/2024 financial year Rakon Group has required compliance with the Rakon Business Code of Conduct and Supplier Code of Conduct by its companies and its suppliers, and that it has taken the steps set out in the Code in order to ensure such compliance.



Sinan Altug

Chief Executive Officer

Rakon Limited

26 September 2024



<sup>i</sup> As at 31 March 2024

<sup>ii</sup> As at 31 March 2024