FILTRONIC



Group Values and Policies

filtronic.com

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Filtronic plc

Introduction to Filtronic Group Values and Policies

Each of the policies within this document, the Filtronic Group Policies, are relevant to Filtronic plc ("the Company", "Filtronic" or "the Group") and all of its subsidiaries and associates.

Filtronic plc places a strong emphasis on promoting a culture that is based on ethical values and behaviours. We want to be a good corporate citizen and a trusted partner for our shareholders, customers, employees and other stakeholders. We are, therefore, committed to responsible corporate behaviour and compliance with all laws, regulations and other requirements that govern the conduct of our operations.

Whilst the Group Policies provide guidance on how we are to act in an ethical and compliant way, the Filtronic plc board recognises it is not possible to cover every situation that may arise in the day to day running of the business. Accordingly, the Board has defined and adopted a set of corporate values that are intended to guide the objectives, strategy and operation of the Company and be reflected in the behaviour of every employee.

The Filtronic Values and Behaviours can be found on our website and overleaf in this document. They act as a complement to the Group Policies. It is the responsibility of each employee to use their sound judgement in both implementing the policies and acting in line with them in the execution of your everyday work. Filtronic expects employees to conduct themselves, at all times, in a trustworthy and appropriate manner so as not to discredit or harm the Company.

Filtronic believes that a strong ethical culture depends in part upon creating an environment in which employees feel free to report instances of non-compliance of our Group Policies. We encourage all employees to be open and honest and report any breach of these Group Policies to management as soon as possible so corrective action can be taken quickly. By demonstrating our core value of integrity and reporting issues, we can tackle issues head on and resolve the matter in a positive way to become a stronger organisation. However, whilst very rare, some breaches or a deliberate failure to report a breach, may result in disciplinary action and/or criminal penalties depending on the seriousness.

If you have any suggestions in relation to the Group Policies and indeed comments on the Filtronic Values, and/or how they are recognised and respected, please speak to or email the Chief Financial Officer, the Company Secretary, Director of HR or indeed myself.

Nat Edington

Chief Executive Officer

30 October 2026

Filtronic plc

Filtronic Values and Behaviours

We all wish to be thought of as “being of good character”.

However, our character is not measured by the values we espouse, but by the values we demonstrate we live by and are guided by through our behaviour.

It is not enough to write a “Values & Behaviours Statement” and expect others to see us this way, we must be seen to be living them, or their very purpose is undermined.

Filtronic employs a special kind of person. They are experts in their field, confident communicators who love to collaborate, solve problems, and step up to a challenge.

At Filtronic, we aspire to live by, and demonstrate through our behaviour, the following fundamental values:

Integrity	Act with integrity; being honest and fair, always keeping our promises. Do the right thing, not the easy thing, speak up if it’s not right. Deliver on your promises. Be truthful, always being honest and open. Be fair and ethical in your work and decision making. Take responsibility for your own actions, learn from mistakes when they happen.
Respect	Be respectful to all; it is the foundation of our culture. Be inclusive, always respecting and valuing others. Act how you want to be treated; being kind, considerate and respectful of others and their opinions. Be supportive and positive in all your working relationships. Value the importance of equality, diversity and inclusivity. Be open-minded and upfront with people.
Excellence	Strive for excellence; it is what our clients and colleagues expect and what we endeavour to deliver. Perform to the highest professional standards. Be innovative and pragmatic with problem solving. Take pride in our work, paying attention to detail. Be agile and flexible in your approach. Be curious and challenge constructively to improve how we work.

Living these values every day in our work is a tough ask. However, the more we aspire to do so, the more we will, and the better we will become as a business, as a partner to our external stakeholders and as a place to work with pride.

Our Purpose: To be the trusted provider of innovative RF solutions.

Our Vision: Enabling the future of RF, microwave and mmWave communication.

Our Mission: Creating value for our clients through technology leadership.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Code of Ethics

The Filtronic Code of Ethics applies to all employees including permanent and temporary staff, interns, secondees and staff provided by staffing agencies. It is important that everyone who this Code applies to has read it and understands it. Filtronic also expects its suppliers and other business partners to conduct themselves in the same manner.

This code provides guidance on how to act in certain situations but above all:

1) We are open and honest
2) We comply with all applicable laws and regulation
3) We do not engage in anti-competitive activity, bribery or corruption
4) We protect our company information and confidential information shared with us
5) We follow good standards of corporate governance and do not abuse market regulations

Legal Compliance

The Company will comply with all applicable laws and regulations and requires that all its employees conduct business in accordance with the law.

Conflict of Interest

Conflicts of interest can arise when our personal, family, financial, political or other interests interfere or conflict with our loyalty to the Company or our ability to make the right decisions on behalf of Filtronic. If an employee believes there is, or may be, an actual or perceived conflict of interest, we expect them to disclose it as soon as it has been identified so it can be considered and the right action taken. In many cases, simply disclosing the conflict to Management will be enough to resolve the problem but in more complex situations further action may be needed.

To mitigate conflict of interest, employees should avoid any relationships, influence or activity that might impair their ability to make fair and objective decisions when performing their job.

(Please see the separate Conflict of Interest Policy for more information).

Confidential Information

Employees must handle the property and information of the Company, its Customers and Suppliers with due care, in particular:

(i) Company Information should be treated as confidential; included in this are technical and financial data, company policies, procedures, letters, plans, drawings and computer programs, product developments, price and cost data and personal data.

(ii) Customer or Supplier Information should be treated as confidential except when this information has been obtained through publicly accessible sources, or when the Customer or Supplier explicitly releases the information.

(iii) Confidential information must also be handled in accordance with the Company's internal AI Policy.

Company Records and Data

Company Records and Data must be prepared accurately and honestly to represent the facts, meet regulatory requirements and comply with our internal controls.

Employees must understand that all work undertaken by them, including email, communications via any channel and content created under their employment belongs to Filtronic and, where legally permitted, may be accessed and used by the Company, even after you have left.

Ensure that the Security Controller and the IT Manager are aware before starting any new activity involving the collection of sensitive or personal information.

Data should only be kept in line with the Filtronic Data Retention Policy.

Procurement

Business will be awarded solely on the merits of the offered product or service; employees must not engage in any activity or allow any relationships to impair their judgment.

Gifts, gratuities, hospitality or favours of significant value must not be exchanged by employees with Customers or Suppliers except where they are publicly presented for noteworthy service or when explicitly authorised by an Executive Director.

(*Please see the Anti-Bribery and Corruption Policy for more information*).

Bullying and Harassment

The Company is committed to providing an organisation that is free from bullying and harassment in all its forms. Filtronic will work to ensure that its employees are treated in a respectful manner that acknowledges the dignity of each individual. Any alleged instance of such conduct should be reported to the appropriate management level or if necessary, through the whistleblowing procedure so that appropriate actions can be taken by the Company.

Quality

We are all responsible for ensuring that we sustain and grow the reputation of our brand by delivering the highest quality products and standards in all parts of our business.

Customer satisfaction is crucial, the extent to which the Company meets the needs and expectations of the Customers and the market they serve, shall be regularly reviewed.

(*Please see the separate policy on Quality*).

Health and Safety

We work safely, or not at all. We never walk by if we notice unsafe actions or situations.

We support health and wellbeing.

External Communication and Social Media

Everything we do, everything we say, and everything our stakeholders say about us can affect Filtronic's reputation. In a world where information travels in an instant, it is crucial we carefully manage communications with our external stakeholders, including investors, the media, customers and government representatives.

The Board are exclusively responsible for communication with investors whilst communication with the media including trade press must be approved by the Marketing department or an Executive Director. Employees should refer or seek approval before proceeding to engage with the media.

As a plc on the AIM market, employees and stakeholders must be aware that 'price sensitive' information capable of impacting the share price must not be communicated either externally or internally other than through an Executive Director. The consequences for the employee and the Company could lead to criminal convictions if not adhered to.

If employees want more information on communication, there is a detailed explanation in the Procedures and Authorities Manual ("PAM").

Outside of work, employees are strongly advised not to comment on social media platforms about the Company. Before you make a comment, you should ask yourself the question: "Could what I am saying have a negative impact on Filtronic or its stakeholders?" If the answer is yes, or possibly, you should not proceed.

(Please see the separate Social Media Policy).

Financial Controls and Risk Management:

A review of the effectiveness of the Company's internal controls shall be conducted at least annually and shall be documented and shall include financial operational and compliance controls and risk management systems.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Management Policy

Management Code of Conduct

The directors of Filtronic plc ("the Company") and the directors and managers of each of the subsidiaries shall behave in relation to the Company (and subsidiaries as applicable) in a manner that complies with the statutory duties for directors as set out in the Company's Act 2006. In particular they shall: act within their powers for proper purposes; promote the success of the company; exercise independent judgement; exercise reasonable care, skill and diligence, avoid conflicts of interest; not accept benefits from third parties; declare interests (where such interests exist) in proposed transactions or arrangements.

Promoting Success

The management of Filtronic plc and of each of its subsidiaries shall manage the Company (and subsidiaries as applicable) in the way it considers, in good faith, would be most likely to promote the success of the Company for the benefit of members as a whole having regard to amongst other matters: the likely long-term consequences of decisions; interests of employees; need to foster business relationships with suppliers, customers and others; impact of company operations on the community and the environment; desirability of maintaining a reputation for high standards of business conduct and the need to act fairly between members.

Management shall determine the structure and operation most appropriate to achieve its business objectives within the Company's strategy and ensure compliance with the Company policies within the Code of Ethics.

Consultative Management

The process of planning, risk assessment, progressing, reviewing and reporting is applicable at all levels. Management will operate in a consultative manner; meetings and discussions shall involve all employees whose knowledge contributes to and whose skills and commitment is crucial to the execution of the task. The Company shall operate at all levels in a consultative manner.

Communication

Operational performance and progress against strategic targets shall be communicated regularly throughout the Company.

Financial Controls

The provisions of the financial Procedures and Authorisations Manual ("PAM") and the Distribution of Authority must be adhered to by all.

Risk Management

A review of the effectiveness of the Company's internal controls shall be conducted at least annually and shall include financial, operational and compliance controls and risk management systems.

Community Support

The Company shall engage with the communities within which it operates through, where appropriate, charitable donations (to be authorised at Board Level), sponsorship and participation in local educational and welfare initiatives.

Reports to the Group Board

The following should be brought to the attention of the Board of Filtronic plc without delay:

i. **Breach of the Code of Ethics**

   Any breach which could adversely affect the Company's legal or ethical standing should be promptly reported.

ii. **Significant Customer Complaints and Product Liability Claims:**

   Customer Complaints should be answered speedily, courteously and truthfully. The Company shall maintain a record of significant complaints (including product liability claims) and should promptly advise the Group Board of the background circumstances and of the steps taken to answer the complaint (or deal with the claim). Significant complaints or claims should, where possible, be expressed in writing by the Customer to avoid ambiguity or misunderstanding. The initial recipient of the complaint, or an appointee, shall be responsible for keeping the complainant advised of the progress of the complaint subject always to advice and guidance from the Company Secretary/General Counsel.

iii. **Contractual Terms:**

   Any request to trade with the Company on terms other than Filtronic plc's standard conditions, within authorised limits, should be approved in line with the Distribution of Authority.

iv. **Whistleblowers:**
   (Please see the separate policy on Whistleblowing).

Each Manager is responsible for the communication of the Filtronic plc PAM (and any updates thereof) and other governance documents including the Group Policies and the Distribution of Authority to all relevant employees within their reporting line.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Employment Policy

Filtronic plc, its subsidiaries and business units shall abide by the following principles and expects its suppliers to abide by these or equivalent principles:

- **Child Labour**
  Not to condone or engage in the use of child labour or require persons below 18 years to work at night or in hazardous conditions. By child, we mean any person under 15 years of age, or older where there is a higher school leaving age, in which case the higher age applies. If the local law is set at 14 in accordance with developing-country exceptions under ILO Convention 138, this age applies.
- **Forced/Compulsory Labour**
  Not to condone or engage in the use of any form of compulsory or forced labour directly or indirectly such as by requiring personnel to lodge “deposits” or identity papers upon commencing employment with the Company.
- **Disciplinary Practices**
  The Company’s disciplinary procedures shall not condone mental or physical coercion, verbal abuse, sexual or other harassment.
- **Working Hours**
  Shall comply with national laws. Required overtime and remuneration for overtime shall be specified in the individual’s terms of employment.
- **Equal Opportunities and Diversity**
  To ensure equal treatment and not to condone or engage in discrimination in hiring, compensation, access to training and promotion, based on arbitrary criteria such as race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- **Freedom of Association and Collective Bargaining**
  To respect the rights of all staff to form and join trade unions of their choice and bargain collectively. If these rights are restricted under law, to facilitate the development of parallel means for independent and free association and collective bargaining.

Managers must ensure that relevant local legislative requirements are addressed and to brief, train and monitor compliance to these Policies.

Procedures should be generated, based upon the above, and reflect the legal requirements of the territories, within which we operate, and shall make those procedures accessible to all its employees.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Diversity and Equal Opportunities Policy

Filtronic plc ("the Company") together with its subsidiary companies (herein "Filtronic") sets out its Diversity and Equal Opportunities Policy below.

This policy forms part of your Terms and Conditions of Employment. Failure to comply with this policy will be regarded as a breach of your contract of employment and could lead to disciplinary action.

Purpose

This policy applies to all colleagues, including contractors, agency workers and stakeholders of Filtronic. Filtronic is committed to promoting a culture where colleagues are supported, respected, valued for their difference (diversity) and treated consistently and fairly through equal opportunities for all.

Policy Principles

Filtronic will be guided by the requirements of the Equality Act (2010) and is committed to providing a working environment in which everyone feels valued and respected and is able to pursue a rewarding career whilst contributing to the success of our business. We will apply the standards set out in this policy and will establish monitoring and other supporting processes to ensure fair employment-related decisions. The main areas where these processes are established include:

- Recruitment;
- Career planning;
- Promotion and transfer;
- Training and personal development;
- Performance management;
- Redundancy;
- Appropriate remuneration; and
- General well-being.

In particular, we will maintain the explicit commitments set out in our Code of Conduct. It is our aim to provide equal opportunities for all without discrimination, directly or by association, on the grounds of:

- Race, ethnic origin, skin colour or nationality;
- Religious or political beliefs and affiliations;
- Sex, gender reassignment, gender identity or sexual orientation;
- Marriage/civil partnership;
- Age;
- Disability;
- Pregnancy or maternity
- Membership or non-membership of a trade union.

We aim to ensure that no-one in our business, or seeking employment with us, receives less favourable treatment on the above grounds or is disadvantaged by requirements or conditions which cannot be shown to be justifiable. In some countries in which we operate, local laws dictate that preference must be given to particular groups and this is a justifiable reason for discrimination. Access to employment, training and promotion is based solely on the objective assessment of ability and other relevant job-related criteria. In the case of training and career development access will also be based on assessed need.

In addition to this:

- We respect the dignity of individuals and their beliefs
- We do not tolerate any harassment or bullying (whether physical or mental) in the workplace, or at functions connected with the workplace.

By valuing diversity and being an inclusive employer we understand that we will:

- Attract the best people with the right skills and experience
- Develop and use the talents of our workforce effectively
- Improve motivation and performance
- Support each other to balance work and home responsibilities
- Attract customers from across the community and enhance the trust and loyalty demonstrated by our brand.

Responsibilities

As a Filtronic colleague, you will be expected to be responsible and treat others with dignity. Any individual who breaches this policy may be subjected to disciplinary action under the Filtronic Disciplinary Policy and, in serious cases; this may result in their dismissal. Individual colleagues who have been involved in bullying or harassment may also be personally guilty of unlawful harassment and, in some cases, at risk of criminal prosecution.

Everyone has a strict responsibility to:

- Respect and act in accordance with this policy
- Treat all colleagues fairly and without discrimination
- Ensure that their own behaviour does not cause offence or distress
- Report any incident or behaviour which contravenes this policy and not indirectly support unfair treatment by ignoring what is happening around them.

In addition, those who manage people are responsible for:

- Ensuring that the policy is fairly and consistently applied in all areas under their control
- Eliminating and addressing any unfair practices of which they are aware, whether or not a complaint has been made
- Promoting an environment in which people feel comfortable in reporting incidents which are causing them concern.

Procedure

What should I do if I believe I have been discriminated against or treated unfairly?

If you believe that you have been subjected to discrimination, you should contact your immediate manager in the first instance. If the matter is not resolved to your satisfaction, then please contact your HR Department or use the Filtronic grievance procedure.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Conflict Minerals Policy

Our Commitment

In support of the efforts outlined in the global Conflict-Free Sourcing Initiative (CFSI) and Filtronic's commitment to corporate social responsibility and respecting human rights in our own operations and in our global supply chain, it is our goal to use tantalum, tin, tungsten and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region.

Our Approach

A limited number of Filtronic's approved suppliers acquire and use conflict minerals from multiple sources worldwide therefore Filtronic may as a result be many levels away from the beginning of the supply chain for some of the components used in the products it manufactures or contracts to manufacture. We expect our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict minerals are DRC conflict free.

In support of this policy, Filtronic will:

- Exercise due diligence with relevant suppliers who will be procuring or utilizing conflict minerals in the delivery of their products or services to Filtronic.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the tantalum, tin, tungsten and gold in our supply-chain are "conflict free".
- Collaborate with our suppliers and others on industry-wide solutions to enable products that are DRC conflict free.
- Commit to transparency in the implementation of this policy by making available reports on our progress to relevant stakeholders and the public (via website – request for information).

Filtronic is committed to:

- Helping our suppliers undertake due diligence to investigate and understand the source of any Conflict Minerals in the products they sell to Filtronic.
- Not continue to source from a supplier any product that contains Conflict Minerals if Filtronic determines the product is not DRC Conflict Free and the supplier fails to implement reasonable steps to transition to DRC Conflict Free sources.

Supply Chain Expectations

We require all our approved suppliers to maintain effective controls and reporting methodologies to ensure they can demonstrate compliance with the objectives of this policy. We expect all our approved suppliers to;

- Source Conflict Minerals only from sources that are DRC Conflict Free.
- Develop Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflict Minerals that are not DRC Conflict Free from being included in the products sold to Filtronic.

- Training personnel on their internal policies on how to prevent conflict minerals entering the supply chain.
- Maintain records that support product or material traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable;
- Using reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free;
- Advising Filtronic of any determination the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to Filtronic are not DRC Conflict Free; and
- Periodically, at Filtronic's request, providing information concerning the origin of Conflict Minerals included in products sold to Filtronic, which Filtronic shall be entitled to use or disclose in satisfying any legal or regulatory requirements or in any customer or marketing communications, notwithstanding the terms of any confidentiality agreements that do not specifically reference this paragraph.

Conflict Minerals Reporting:

Filtronic will utilise the Conflict Minerals Reporting Template (CMRT – latest version) to report conflict minerals data associated with the products and processes related to Filtronic and its supply chains. This template will be a live document and updated whenever new information is obtained from the supply chain as a result of changes to current products and/or materials or any new product introduction utilising previously unreported materials.

Where required, Filtronic will comply with specific customer reporting methods and frequency.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Modern Slavery Policy

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Filtronic plc ("the Company") together with its subsidiary companies (herein "Filtronic" and "we") have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the Policy

The board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The relevant Business Unit Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Company Secretary or any plc director.

Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the contacts in the whistle-blower policy as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or any plc Director or Company Secretary OR report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or any plc Director or Company Secretary.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook or from the HR department.

Supply Chain Expectations

We require all our approved suppliers, where relevant, to maintain effective controls and procedures to ensure compliance with local/regional legislation on modern slavery and to train their personnel accordingly in line with their own internal policies.

Any breach of this policy shall be considered a material breach of the contract and relationship with Filtronic shall be terminated, with supplier status updated to disapproved.

Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Nat Edington, CEO

Signed Nat Edington 9 November 2026

Approved by the Board of Filtronic plc on 30 October 2026 for Financial year ending 31 May 2026

Filtronic plc

Employment of Connected Persons Policy

Employment decisions related to selecting, engaging, promoting, remunerating and terminating employees should be based solely on an individual's qualifications, ability and performance. When relatives work for the same employer, a potential for favouritism (nepotism) exists making it important for Filtronic (the "Company" and the "Group") to develop, publish and adhere to policies regarding the employment of family members. (This policy applies to all companies within the Filtronic group of companies.)

Nepotism may include but is not limited to:

- Helping someone get a job or promotion because he or she is a relative;
- Giving preferred work assignments to a relative;
- Overlooking performance issues;
- Making other decisions that impact favourably on a relative based solely on kinship.

The Filtronic policy provides that members of an employee's immediate family will be considered for employment on the basis of their qualifications/skills.

Immediate family may not be engaged, however, if employment would:

(i) Create a supervisor/subordinate relationship (directly or indirectly) with a family member;
(ii) Have the potential for creating an adverse impact on work performance; or
(iii) Create either an actual conflict of interest or the appearance of a conflict of interest.

This policy must also be considered when assigning, transferring, or promoting an employee. For the purpose of this policy, immediate family includes: spouse, civil partner, parent, child, sibling, in-law, aunt, uncle, niece, grandparent, grandchild, members of the same household. This policy also applies to romantic relationships.

Employees who become immediate family members or establish a romantic relationship may continue employment as long as it does not involve any of (i), (ii) or (iii) above.

If one of the conditions outlined should occur or be likely to occur, reasonable attempts will be made to find a suitable position within the Group to which one of the employees will transfer. If employees become immediate family members or establish a romantic relationship, the Company (involving the Filtronic HR function) will make reasonable efforts to reassign job duties so as to minimise problems of supervision, safety, security or morale.

If it is not possible to transfer an employee to an alternative role or to find alternative duties (if, for example, one of the individuals is in a significantly senior e.g. Board or executive role whether at company or group level) the Company may have to consider terminating the employment of one of the employees. The Company would consult with both employees before any such decision is taken.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Health and Safety Policy

The Board of Filtronic plc ("the Company") aims to achieve the highest standards in the management of health and safety at all our sites. These standards apply to everybody who accesses our sites.

The Board considers that the operation of an effective health and safety management system is fundamental in establishing and supporting an active health and safety culture and ensuring continual improvement. The Board's objective is to ensure all Filtronic sites take appropriate steps to protect the Health and Safety of employees, contractors, agents, customers, visitors and the general public.

To this end, the Board requires the Chief Executive Officer ("CEO") to maintain and publish a site-specific Health and Safety Policy which ensures an integrated approach to Health & Safety is applied to the site in support of sending everybody "Home Safe Every Day". The CEO must ensure that each site:

- Actively involves employees, including consultation on matters affecting their health and safety.
- Provides a framework for setting Health and Safety objectives.
- Identifies health and safety risks which will be eliminated or reduced.
- Provides appropriate safe and healthy working conditions for the prevention of work-related injury and ill health.
- Employ safe practices in the installation, operation and maintenance of equipment and facilities.
- Employ safe practices in the transport, handling, storage, use and disposal of potentially dangerous articles and substances.
- Regularly review and comply with all legal requirements, and applicable Filtronic standards.
- Commit to monitoring and continually improving its Health and Safety performance, including its leadership and management systems.
- Consult with our workforce and communicates to all interested parties, ensuring that they are aware of the wider Health and Safety objectives and performance, as well as their individual health and safety obligations.
- All visitors and contractors working on Company premises must be inducted and made aware of workplace risks. Visitors on site must be adequately supervised.

Filtronic will maintain a positive and progressive approach to Health and Safety issues, and our CEO will ensure that each site has the capability to discharge their duties with respect to this policy statement. This policy will be reviewed regularly and updated as necessary. This policy is available to interested parties upon request or via our website.

Approved by the Board of Filtronic plc
30 October 2026

Filtronic plc

Quality Policy

Filtronic plc ("the Company") together with its subsidiary companies and business units (herein "Filtronic") are strategically committed to being a world leader in the design and manufacture of RF & Microwave products and services offering complete solutions to meet or exceed customer and applicable statutory and regulatory requirements at competitive prices.

Filtronic plc has established a Quality Management System that:

- Is appropriate for the purpose and context of our organisation and supports our strategic direction
- Provides a framework for setting quality objectives that are relevant to the conformity of our products and enhance customer satisfaction
- Is committed to satisfying applicable requirements
- Maintains effectiveness through a process of monitoring and continual improvement versus measurable objectives at all levels of the organisation
- Is committed to continually improving our Quality Management Systems

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Environmental Policy

Filtronic plc, its subsidiaries and their business units, are strategically committed to protecting the environment:

- Through prevention of pollution and minimising our impact on natural resources;
- By operating in compliance with all relevant statutory and regulatory obligations through the adoption of environmental best practices throughout our activities;
- By continually improving our environmental management system to enhance our environmental performance.

The effectiveness of our Environmental Management System is maintained through a process of monitoring and continual improvement against measurable objectives at all levels of the organisation.

As part of our activities and decision-making process, we will:

- Integrate the consideration of environmental concerns and impacts into the design and manufacture of our products;
- Promote environmental awareness among our employees, customers and supply chain;
- Minimise waste through re-use and recycling and promote efficient use of materials and resources; Strive to prevent pollution and to continually improve our environmental performance;
- Minimise the social impact and damage from our activities by periodically reviewing our environmental policy based on our current and planned future activities.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Counterfeit/Grey Goods Policy

Our commitment

Filtronic is committed to maintaining the highest standards of quality and authenticity throughout our products, services and supply chain. We take all reasonable commercial endeavors to prevent counterfeit, or non-genuine materials entering our operations or being supplied to our customers.

Our Approach

To minimise the risk of counterfeit products we have implemented a plan, do, check, act & risk-based approach through our procurement and supplier management policies. These policies include the following measures

- Only procuring items from original equipment manufacturers, authorised distributors, or authorised re-sellers, where commercially practical.
- Assessing all approved suppliers before onboarding to ensure they have a counterfeit policy no less onerous than our own.
- Seeking suppliers who hold recognised quality and supply chain recognised accreditations, where appropriate to the products they are supplying.
- Periodically reviewing our approved suppliers' capabilities and policies.
- Investigating any concerns regarding product authenticity in a timely manner and taking appropriate action where necessary.

Supply Chain Expectations

We require all our approved suppliers to maintain effective controls to prevent counterfeit products from entering the supply chain. We expect all our suppliers to;

- Maintain and actively review their counterfeit prevention policies or equivalent controls.
- Maintain records that support product or material traceability
- Notify us promptly of any suspected or confirmed counterfeit materials that may affect the goods or services they are providing to us.

Cooperate fully with any investigation into counterfeit or suspect products.

Filtronic undertakes to use reasonable commercial endeavours (which are appropriate in all the relevant circumstances) to ensure that neither it nor its suppliers use or supply counterfeit goods or use counterfeit goods in its supply chain.

According to the OECD, counterfeit products encompass all products made to closely imitate the appearance of the product of another so as to mislead consumers. Those can include the unauthorised production and distribution of products that are protected by intellectual property rights, such as copyright, trademarks and trade names.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Social Media Policy

This policy applies to all directors, employees, contractors, interns and secondees of Filtronic plc (the "Company") and its subsidiaries including staff provided by staffing agencies. It is important that anyone using social media, whether for business or personal reason, has read and understands this policy.

The Company appreciates that many people enjoy using social media and it is now entrenched in daily life with most people accessing the various platforms multiple times a day. Employees can be great ambassadors to promote and reinforce the human side of our business but at the same time, recognising comments they make on social media should be respectful. Employees represent Filtronic, at all times, so they should understand the pitfalls of inappropriate posting as the Company has a right to protect its reputation, intellectual property, trade secrets, confidential and sensitive data. The aim of our Social Media Policy is to provide guidance and explain the risks further.

In this policy the Company aims:

- To encourage employees to promote the business on social media platforms whilst respecting we are a public company listed on the London Stock Exchange. Some of the information, which if made public, could constitute 'price sensitive' news or 'inside information' and have an impact on the share price. Our policy prohibits the disclosure of price sensitive news on social media;
- To establish clear rules of engagement including personal usage of social media and engagement for the benefit of the Filtronic brand;
- To remind you that what you say on social media sites, even outside of your working time, is not private and can be damaging to the Filtronic brand;
- To understand that posts on social media are ever-present; always pause and think before posting. If you delete a post, the chances are someone has copied, retweeted or shared it;
- To emphasise that Filtronic will not tolerate comments which bring the Company, its employees, customers or other stakeholders into disrepute or which infringe the Company's other policies including, but not limited to, the IT Policy, Code of Ethics, Data Protection Policy and any other confidential or sensitive information. Always remember that passion is healthy, but anger is not;
- To explain the possible consequences of policy breaches; and
- To remind you that monitoring is taking place.

Social media means:

- Professional networking sites such as LinkedIn
- Social networking sites such as Facebook, Snapchat, TikTok, X and Instagram
- Social question-and-answer websites such as Quora and Reddit
- Other social media such as YouTube, Substack, SlideShare and WhatsApp
- Any media yet to be invented but fulfils the accepted definition of social media

Please note TikTok is not permitted on any company-owned devices following the UK government's decision to ban TikTok on government devices.

Social media guidelines

Below are links to Filtronic's official accounts. All employees are encouraged to follow, view and share official Filtronic posts to help amplify our brand:

LinkedIn	https://www.linkedin.com/company/filtronic
X	https://x.com/Filtronic
YouTube	https://www.youtube.com/@Filtronic_plc

If you are creating social media posts associated with Filtronic for example, our technology, your role and the industry in general then please follow these simple rules to protect our brand and your own personal and professional brand:

1. Focus on the good – Play nice, have fun and connect. Don't use it as an opportunity to be negative about any stakeholders including our competitors or customers.
2. Be upfront - Your presence in social media must be transparent, please clarify your opinions are your own.
3. Respect – Take extra care to protect Filtronic and yourself. Be aware of the language you use
4. Use common sense – Always be professional and adhere to our values.
5. Permanent – Please be aware that whatever you say is permanent.

Before you make a comment, you should ask yourself the question: "Could what I am saying have a negative impact on Filtronic or its stakeholders?" If the answer is yes, or possibly, you should not proceed.

Use of company equipment for personal social media activities

You may use company equipment, including PCs, laptops and smartphones to access social media outside of your working hours or during breaks if your role requires it. However, you must not access any inappropriate or offensive websites (further details can be found in the IT Policy) and you must comply with the rules on responsible content.

Use of your own equipment to access social media sites whilst you are at work

You must not use your own equipment (e.g. your iPhone, iPad) to access social media when you are supposed to be working other than for the benefit of your role such as LinkedIn posts. Any usage should be restricted to breaks.

Posting responsible content on social media sites

When using social media sites such as Facebook, Instagram, TikTok (only on personal devices), X, YouTube, blogs etc. you are operating in a public space and your conduct may have serious consequences for the Company, its employees, its customers/suppliers and other affiliates.

Remember, even when you are on a personal account, your social media activity could be seen by customers or potential customers, so you should treat every interaction on social media as if you are dealing with a potential customer.

All Filtronic team members are encouraged to share news and information. If you see something being shared related to Filtronic on a social media platform that shouldn't be happening or is potentially damaging to the brand, immediately inform the Marketing department, the HR department or your manager. Always remember that anything posted in social media can go viral or be screenshot, reshared or reposted as there is very little privacy protection for anything shared on social media, no matter what your privacy settings may be.

You should comply with the following basic rules whenever you are using social media sites, whether using company equipment or your own equipment and whether you are doing so during or outside of working time.

Do:

- Act within the guidelines within this policy;
- Be professional and a good citizen - when posting please be professional about the information you share;
- Write what you know – when commenting on Filtronic we encourage you to write in the first person and stick to your area of expertise if it relates to Filtronic technology;
- Remember that conversations between 'friends' on social media are not truly private and can still have the potential to cause damage;
- Focus on the good - make sure that when posting about Filtronic that you focus on the positive impact of Filtronic;
- Support transparency, equality, diversity, and inclusion in what you say online; and
- Report to HR, Marketing or IT if you see anything on a social media site that indicates that a colleague may have breached this policy.

Do not:

- Make comments which could damage the reputation of the Company or its employees;
- Make comments which could damage the Company's relationships with its customers/suppliers and other affiliates;
- Express opinions on the Company's behalf;
- Use social media to insult, embarrass or offend a colleague, customer, supplier or other stakeholder;
- Post comments or pictures which are inconsistent with our values;
- Use social media to bully, harass, discriminate or anything that breaches the Filtronic Code of Ethics;
- Write something on social media when angry, upset or having had alcohol. If you feel strongly about something, we'd encourage you to talk to your manager or a director rather than posting your opinion on social media. It is often helpful to take some time away from your computer to clear your mind before sending, when something has made you feel emotional.
- Communicate anything sensitive, confidential or information that could be considered 'price sensitive' or 'inside information' i.e. financial or contract information;
- Communicate anything that would violate the local law; and
- Use a company e-mail address to register on social media sites except for Filtronic owned accounts where personal email addresses must not be used to register the account.

Monitoring

The Company logs and audits the use of company computers, laptops and handheld devices, including email, internet and other computer use. Software has been installed to monitor which internet sites you visit. The Company will look at the content of what you have posted or uploaded where the Company has good reason to do so. The Company does this in order to investigate and detect unauthorised use of our equipment in breach of our policies, including social media use. For further details of how the Company monitors and the purpose of monitoring, please see the IT Policy.

Breaches of this policy

Any breach of this policy will be taken seriously and may lead to disciplinary action. In serious cases, such as posting material which could damage the company's reputation, or which amounts to bullying and harassment or the disclosure of confidential information, this could include dismissal under the Company disciplinary procedure.

AIM rules dictate information of a 'price sensitive' and 'inside information' nature should be disclosed through the regulatory service on the RNS system before being released on the Company's website or social media channels. If found to be in breach of AIM Rules, it could lead to substantial fines for the Company and potentially criminal proceedings for employees.

You must remove any material posted on social media platforms in breach of this policy upon our request. Failure to comply with such a request may in itself result in disciplinary action being taken or contracts being terminated.

You must co-operate to the fullest extent possible in any investigation into suspected breaches of this policy. This may include handing over any relevant passwords in situations where we need these passwords in order to investigate a suspected breach.

Social Media Account Ownership

If you participate in social media activities as part of your job at Filtronic on an account created for that purpose, that account is considered Filtronic's property. It remains the property of Filtronic if you leave the Company meaning you will not try to change the password, account name, create a similar sounding account, assert any ownership of the account or the contacts and connections you have gained through the account. Any materials created for or posted on the account will remain Filtronic's property. This doesn't apply to personal accounts that you may access at work but does apply to all Filtronic branded accounts.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Anti-Bribery and Corruption Policy

Filtronic is committed to the practice of responsible corporate behaviour and compliance with all laws, regulations and other requirements which govern the conduct of our operations.

The Company is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 ("the Act") and has processes to ensure that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

Definition of Anti-Bribery and Corruption

This Policy should be read in conjunction with the Company's Management Policy and Code of Ethics. For the purpose of this policy, bribery and corruption are defined as giving someone a financial or other advantage to encourage that person to perform improperly in their functions or activities or to reward them for having already done so. The principles of this policy apply to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company or its subsidiaries. This includes all employees and agents of people conducting business with the Group. Filtronic staff should take reasonable steps to ensure that there is compliance with these principles throughout the Filtronic supply chain.

It is the responsibility of all the above-mentioned parties to ensure that bribery is prevented, detected and reported.

Filtronic's Stance on Bribery and Corruption

This policy applies to all parties listed in the definition above. They will, at all times, comply with the law and have a duty to inform themselves and their direct and indirect reports about this policy and the national and international laws relating to their business activities.

Filtronic will not engage in bribery or corruption.

Parties described above must:

- Be aware and alert at all times of all bribery risks as described in this policy;
- Exercise due diligence at all times when dealing with third parties on behalf of the Company; and
- Report any, and all, concerns relating to bribery to the Chief Executive Officer, or in the case of non-employees to their normal point of contact within the Company, or otherwise in accordance with the Group's Whistleblowing Policy.

Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.

Facilitation payments

A facilitation payment is defined as a small payment made to officials in order to ensure or speed up the performance of routine or necessary functions.

Facilitation payments constitute bribes and, subject to the following paragraph, may not be made at any time irrespective of prevailing business customs in certain territories.

Facilitation or similar payments may be made in limited circumstances where your life is in danger but under no other circumstances. Any payment so made must be reported to the Chief Executive Officer as soon as is reasonably possible and practicable.

Gifts and Hospitality

Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the Management Policy.

Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the Company.

The following general principles apply:

- Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
- Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
- Cash should be neither given nor received as a gift from third parties under any circumstances.
- Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.
- The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
- Certain gifts which would otherwise be in breach of this Policy may be accepted if refusal would cause significant and/or cultural offence; however, the Company will donate any gifts accepted for such reasons to a charity of the Company's choosing.
- All gifts and hospitality, whether given or received, must be recorded in the Gifts and Hospitality Register.

Examples of acceptable gifts to exchange with a third party include modest, of an appropriate type and value, Christmas presents and retirement gifts. There may be instances where gift receipts will be placed into a pool and distributed via a raffle of all employees to ensure fairness with those who are not externally facing.

Periodically, the Company will issue small gifts to its employees to acknowledge performance, effort or a special occasion. In these circumstances, the gift must be approved by an Executive Director of the Company prior to issue.

Charitable Donations

Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.

All charitable donations must be fully recorded with the Finance department.

Proof of receipt of all charitable donations must be obtained from the recipient organisation.

Under no circumstances may charitable donations be made in cash.

No charitable donation may be made at the request of any party where that donation may result in improper conduct.

Political Donations

The Company does not make political donations and the Company is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.

Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the Company and are not made to obtain any form of advantage in any business transaction.

Due Diligence and Risks to be aware of:

The following issues should be considered with care in any and all transactions, dealings with officials, and other business matters concerning third parties:

- Territorial risks and cross-border payments, particularly the prevalence of bribery and corruption in a particular country;
- Requests for cash payment, payment through intermediaries or other unusual methods of payment;
- Activities requiring the Company and/or any associated party to obtain permits or other forms of official authorisation; or
- Transactions involving the import or export of goods.

Reporting a Breach

Any complaints or allegations of breach of this policy may be reported directly to a Board member or confidentially through the procedure set out in the Company's Whistle Blowing Policy.

Anti-Bribery and Corruption Procedure

Procedures that should be followed during business transactions

Filtronic's policy on Bribery and Corruption applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties associated with the Company or its subsidiaries and requires that:

1. Directors and Managers should ensure that staff are aware of the Company's Anti-Bribery Policy and that the Company will not tolerate bribery;
2. Evidence of the staff communication exercise communicating the policy and procedure to all staff should be retained.
3. The risk of bribery should be considered as part of the risk assessment exercise for the business and such consideration should be evidenced;
4. Due diligence on suppliers and agents should be considered particularly before engaging them in business dealings.
5. Stakeholders of the company should:

(i) Not offer or make any bribe, unauthorised payment (whether in cash or kind) or inducement of any kind;

(ii) Not solicit business by offering any bribe, unauthorised payment (whether in cash or kind) or inducement to customers or potential customers. For the avoidance of doubt, providing appropriate and "proportionate" hospitality to customer or potential customers' representatives (e.g. dinner at a good quality restaurant) is not to be considered unauthorised provided it has been authorised by either the CCO, CFO or CEO;

(iii) not accept any kind of bribe or unusual payment or inducement that would unlikely be authorised by the Board of Filtronic in the ordinary course of business; for the avoidance of doubt, attending a training course or dinner or lunch provided by a professional firm or company is not regarded as unauthorised. For other corporate hospitality, (e.g. tickets to a sporting event) the offeree should, before accepting the offer, discuss the matter with his line manager and consider the benefits and risks to the business before accepting or refusing. Employees and agents should refuse any bribe or unorthodox payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation and to report any such offers;

(iv) Not make "Facilitation Payments". These are payments made to secure or accelerate the performance of a routine action to which the payer has a legal entitlement. Filtronic does not condone such payments being made unless required for medical or safety emergencies in jurisdictions where such payments are considered normal. Where this occurs, a record of any such payment should be kept.

(v) Maintain a record of all donations to charities and to political parties;

(vi) Report any breaches of this policy, or the Company's Management Policy and Code of Ethics.

6 If in doubt about accepting any offer or making any offer that might be misconstrued, the employee or agent should consult his /her direct line manager/Board Director or Company Secretary.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Anti-Trust and Competition Policy

Policy Statement

Filtronic is committed to ensuring that business is conducted in a straight-forward and ethical manner that encourages fair and open competition. This policy sets out Filtronic's position on anti-trust and competition law compliance and provides guidance to employees on the prevention, detection and reporting of behaviours which fail to comply with the requirements of these laws.

This policy applies to all persons working for Filtronic or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

What is anti-trust and competition?

Anti-trust and competition law prohibits behaviour that aims to reduce competition in the market. Infringement presents significant risk for every business with breaches of these laws potentially leading to significant fines for companies and imprisonment for individuals. In addition, third parties may bring damage claims against the Company to recover their losses arising from any anti-competitive practices. The enforcement of anti-trust and competition laws in many countries is increasingly stringent and encompasses activities undertaken by a company through its employees or third parties acting on its behalf.

The Company does not engage in or tolerate any form of conduct which fails to comply with the requirements and spirit of anti-trust and competition laws. The fundamental objective of anti-trust and competition law is to regulate anti-competitive behaviour by businesses and individuals which may be to the detriment of customers and competitors.

Examples of anti-trust and competition include:

- Fixing prices of services among competitors within the domestic or international market;
- Rigging bids among competitors in order to enable a competitor to win the bid;
- Limiting production or capacity in unison with competitors;
- An agreement or conduct in a certain geographic market among competitors which has a detrimental impact on competition;
- Unlawful exclusivity arrangements among entities that encourage monopolisation; and
- Unlawful mergers and acquisitions among companies.

The concept of agreement under competition law is generally very broad and can include formal or informal agreements, in writing or otherwise (ie. ranging from written contracts to informal understandings).

Procedure

Our employees and persons connected with Filtronic are prohibited from engaging in any activity that promotes unlawful anti-trust and competition behaviour. This includes formal or informal agreements with competitors, trade associations or industry bodies which result in price fixing, bid rigging, market allocation and arrangements to limit supply. Arrangements like this are almost always illegal and are often criminal.

Be extremely careful in any discussions (including any acquisition negotiations) with actual or potential competitors. Anti-trust and competition law concerns all dealings or communications (including emails and reports) with or relating to suppliers, distributors, customers, competitors and/or markets. Use words carefully, careless use of words can make legitimate competitive activity appear suspect.

Ensure agreements with suppliers, distributors and customers containing restrictions on price, products or territory and/or including any elements of exclusivity, are carefully analysed with the benefit of legal advice before being entered into. Such arrangements should not be entered into with competitors, save for very limited exceptions and any such arrangement should not be entered into without clearance following legal advice.

Address any issues of concern prior to engaging in any particular conduct, the impact of which may be potentially anti-competitive and seek immediate legal advice in the event of any concerns or doubts regarding compliance with anti-trust and competition law requirements.

Prevention of Anti-Competitive Practices

Our anti-trust and competition preventative measures consists of the following elements:

- Consideration of anti-competition risks when exploring new business opportunities;
- Ensure adequate policies and procedures are formulated;
- Investigate allegations relating to anti-competitive behaviour and take appropriate action accordingly; and
- Communicating the message of fair and open competition to the business.

The responsibility for the implementation of this policy rests with all Filtronic employees, our partners and those who represent us. In particular, anybody approving legal documents should pay close attention to adherence with anti-trust and competition laws before entering into the agreement.

When anti-competitive behaviour is found, any transactions that may have been affected will be reviewed retrospectively. An investigation will be conducted by the directors to determine the extent of the breach and the intentions of the parties involved. Where anti-competitive behaviour has been identified the affected stakeholders will be notified.

Reporting suspected anti-trust and competition behaviour

When an employee understands or suspects that anti-competitive practices have been undertaken, they should bring this matter to the attention of an Executive Director as soon as discovered. Managers and Supervisors must also keep an eye on potential anti-competitive behaviour arising relating to the employees that report to them.

In the event that the employee feels the anti-trust and competition issue falls into any of the three categories below:

a) The matter is not resolved to a satisfactory level and an Executive Director is already aware;
b) The employee feels compromised that reporting anti-competitive behaviour involving another member of staff, their manager or an Executive Director would adversely impact their position; or
c) It is an Executive Director that has engaged in anti-trust and competitive behaviour that the employee is uncomfortable with and feels that speaking to the Executive Director would adversely impact their position.

In these circumstances, employees can use the procedure within the Filtronic whistleblowing policy which is set out within the Filtronic Group Policies.

Failure to comply with this policy may result in disciplinary action, which may lead to dismissal, and may expose the Company and/or its employees to criminal or civil liability.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Conflict of Interest Policy

Policy Statement

Filtronic is committed to ensure that a conflict of interest does not arise between an employee's personal interest and the interests of the Company. This policy outlines the rules and responsibilities of employees and the Company to resolve any such discrepancies so an employee's judgement and commitment to the Group is not compromised.

This policy applies to all persons working for Filtronic or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Policy elements

The relationship of the Company with its employees is based on mutual trust. As the Company is committed to preserve the interests of people under its employment, or indeed working on behalf of it, it expects them to act only towards Filtronic's interests.

A conflict of interest may occur when an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine Filtronic and may place it at a disadvantage.

What is an employee conflict of interest?

A conflict of interest can take many different forms that include, but are not limited to, conflict of interest examples:

- Employees' ability to use their position with the Company to their personal advantage;
- Employees engaging in activities that will bring direct or indirect profit to a competitor;
- Employees owning direct shares of a competitor, customer or supplier's stock;
- Employees using connections obtained through the Company for their own private purposes;
- Employees using company equipment or means to support an external business; and
- Employees acting in ways that may compromise the Company's legality (eg. taking bribes or bribing representatives of legal authorities).

Procedure

The responsibility for resolving a conflict of interest starts with the immediate manager and depending on the status and severity may reach the directors of the Group. All conflicts of interest will be resolved as fairly as possible, and steps taken to address the conflict. The directors have the responsibility of the final decision when a solution can't be found.

When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retrospectively. An investigation will be conducted by the directors to determine

the extent of the conflict and the intentions of the parties involved. Where a conflict of interest has been identified the affected stakeholders will be notified. However, if no conflict exists, the investigation may be documented, but no further action will be taken.

In general, employees are advised to refrain from letting personal and financial interests as well as external activities come into opposition with the Company's interests.

Reporting a suspected conflict of interest

The majority of conflict of interests can be addressed and resolved before any actual damage is done and controls put in place to mitigate any instance arising. Therefore, when an employee understands or suspects that a conflict of interest exists, they should bring this matter to the attention of their manager so corrective actions may be taken. Managers and Supervisors must also keep an eye on potential conflict of interests arising relating to the employees that report to them.

If the conflict of interest involves an employee's manager, and the employee feels they can't approach their manager, or the employee feels sufficiently uncomfortable that the conflict of interest may adversely impact their own position within the Company if an Executive Director is not aware, but later finds out, then it is advisable to make an Executive Director of the Company aware of the situation as well as your manager.

In the event that the employee feels the conflict of interest falls into any of the three categories below:

a) The conflict of interest is not resolved to a satisfactory level and an Executive Director is already aware;
b) The employee feels compromised that reporting a conflict of interest involving another member of staff, their manager or an Executive Director would adversely impact their position; or
c) It is an Executive Director that has the conflict of interest that the employee is uncomfortable with and feels that speaking to the Executive Director would adversely impact their position.

In these circumstances, employees can use the procedure within the Filtronic whistleblowing policy which is set out within the Filtronic Group Policies.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Anti-Facilitation of Tax Evasion Policy

Policy statement

Filtronic is committed to conducting all our business in an honest and ethical manner. We take a zero-tolerance approach to the facilitation of tax evasion, whether under UK law or under the law of any foreign country. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implement and enforce effective systems to counter tax evasion facilitation.

We take our legal responsibilities very seriously. We will uphold all laws relevant to countering tax evasion in all the jurisdictions in which we operate, including the Criminal Finances Act 2017.

About this policy

The purpose of this policy is to:

- Set out our responsibilities, and the responsibilities of those working for us, in observing and upholding our position on preventing the criminal facilitation of tax evasion; and
- Provide information and guidance to those working for us on how to recognise and avoid tax evasion.

Who does this policy apply to?

This policy applies to all persons working for Filtronic or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, summer placements, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians, and political parties.

Responsibility - Who is responsible for the policy?

The Board has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Executive Directors and the Company Secretary.

Line managers have day-to-day responsibility for this policy. You should refer any questions or suggestions about this policy to an Executive Director, the Company Secretary or the Director of HR where appropriate.

Points of Contact and Reporting

For further information or queries relating to this policy including training offered in relation to it please contact the CEO, the CFO or the Company Secretary. If there is any suspicion of an employee or an associate attempting to commit tax evasion, please get in touch with either the CEO or the CFO or alternatively follow the Group's Whistleblowing Policy. All communications will be dealt with in the strictest confidence.

Responsibilities of all Employees and Associates

(i) Not engage in any form of tax evasion or facilitation of tax evasion.

(ii) Understand and adhere to this policy at all times.

(iii) Promptly report any known or suspected tax evasion.

What is tax evasion and tax evasion facilitation?

Tax evasion - means the illegal or fraudulent evasion of taxes by individuals or entities. It involves deliberate and dishonest conduct. This is not the same as tax planning, which is not illegal (and involves taking steps, within the law, to minimise tax payable).

Tax evasion facilitation - means the facilitation of tax evasion means knowingly aiding or abetting an individual or entity in evading tax.

What taxes are covered? Tax means all forms of taxation, including but not limited to corporation tax, income tax, value added tax, all types of stamp duty, and national insurance contributions (and their equivalents in any non-UK jurisdiction).

"Red Flags"/Examples - The following is a list of examples of possible red flags that may arise during the course of your working for Filtronic and which may raise concerns related to tax evasion or foreign tax evasion:

- A contract being set up with a new customer as a contract for services, despite it being a provision of goods, to help the customer evade the higher tax that would be due under a contract for goods arrangement;
- Agreeing to send a bill to a different person / entity than who the work was done for, or to a different address, or with a misleading description, in each case knowing that this gives the purchaser or supplier a better tax position;
- Staff being resourced via an agency, with full knowledge of the agency's practice to pay these staff in cash and not declare their income to HMRC;
- A manager signs off an employee's expense claims knowing that they are also using the same receipts to reduce their personal tax bill;
- Intentional manipulation of documents, for example, falsifying dates on dividend documents to alter the tax year in which tax would become due;
- A third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to that entity directly;
- Third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business; or
- A third party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated.

Approved by the Board of Filtronic plc
30 October 2026

Filtronic plc

Share Dealing Policy and Dealing Code

This policy applies to all directors and employees of Filtronic plc (the Company) and its subsidiaries. It has been designed to ensure that you do not misuse, or place yourself under suspicion of misusing inside information about the Group which you have and which is not public. Directors and employees must comply with their obligations under the Market Abuse Regulation ("MAR").

1 You must not ***deal*** in any ***securities*** of the ***Group*** if you are in possession of ***inside information*** about the ***Group***. You must also not recommend or encourage someone else to ***deal*** in the ***Group's securities*** at that time – even if you will not profit from such ***dealing***.

2 You must not disclose any confidential information about the ***Group*** (including any ***inside information***) except where you are required to do so as part of your employment or duties. This means that you should not share the ***Group's*** confidential information with family, friends or business acquaintances.

3 You may, from time to time, be given access to ***inside information*** about another group of companies (for example, one of *the* ***Group's*** *customers* or suppliers). You must not ***deal*** in the ***securities*** of that group of companies at those times.

4 The Group also operates a Dealing Code which applies to the ***Company's*** directors and to employees who are able to access restricted information about the ***Group*** (for example, employees who are involved in the preparation of the ***Group's*** financial reports and those working on other sensitive matters). Because of the relatively small number of employees in the Filtronic Group of Companies, all Filtronic employees are required to comply with the Dealing Code. Directors and employees who are required to comply with the Dealing Code must also comply with this policy.

5 Failure to comply with this policy may result in internal disciplinary action. It may also mean that you have committed a civil and/or criminal offence.

6 If you have any questions about this policy, or if you are not sure whether you can deal in securities at any particular time, please contact the Company Secretary who will request clearance to deal on your behalf from the Chair or CEO as appropriate.

Glossary: For the purposes of this policy:

- ***deal*** and ***dealing*** covers any type of transaction in a company's ***securities***, including purchases, sales, the exercise of options and using ***securities*** as collateral for a loan
- the ***Group*** means the ***Company*** and its subsidiaries
- ***inside information*** is information about a company or its ***securities*** which is not publicly available, which is likely to have a non-trivial effect on the price of such ***securities*** and which an investor would be likely to use as part of the basis of his or her investment decision

- ***securities*** are any publicly traded or quoted shares or debt instruments, and any linked derivatives or financial instruments. This would include shares, depositary receipts, options and bonds

Share Dealing Code

Part A of this code contains the Dealing clearance procedures which must be observed by the Company's PDMRs and those employees who have been told that the clearance procedures apply to them. This means that there will be certain times when such persons cannot Deal in Company Securities.

At present, all employees of the Filtronic plc Group must comply with the clearance procedures in Part A

Part B sets out certain additional obligations which only apply to PDMRs.

Failure by any person who is subject to this code to observe and comply with its requirements may result in disciplinary action. Depending on the circumstances, such non-compliance may also constitute a civil and/or criminal offence.

Schedule 1 sets out the meaning of capitalised words used in this code.

Part A – Clearance procedures

Clearance to Deal

You must not Deal for yourself or for anyone else, directly or indirectly, in Company Securities without obtaining clearance from the Company in advance.

Applications for clearance to Deal must be made in writing and submitted to the Company Secretary* (and in the absence of the Company Secretary any executive director of Filtronic plc) using the form set out in Schedule 2.

You must not submit an application for clearance to Deal if you are in possession of Inside Information. If you become aware that you are or may be in possession of Inside Information after you submit an application, you must inform the Company Secretary as soon as possible and you must refrain from Dealing (even if you have been given clearance).

You will receive a written response to your application, normally within five business days. The Company will not normally give you reasons if you are refused permission to Deal. You must keep any refusal confidential and not discuss it with any other person.

If you are given clearance, you must Deal as soon as possible and in any event within two business days of receiving clearance.

Clearance to Deal may be given subject to conditions. Where this is the case, you must observe those conditions when Dealing.

Programme under which Company Securities may be purchased or sold unless clearance has been given to do so.

Different clearance procedures will apply where Dealing is being carried out by the Company in relation to an employee share plan (e.g. if the Company is making an option grant or share award to you, or shares are receivable on vesting under a long-term incentive plan). You will be notified separately of any arrangements for clearance if this applies to you.

If you act as the trustee of a trust, you should speak to the Company Secretary about your obligations in respect of any Dealing in Company Securities carried out by the trustee(s) of that trust.

You should seek further guidance from the Company Secretary before transacting in:

(A) units or shares in a collective investment undertaking (e.g. a UCITS or an Alternative Investment Fund) which holds, or might hold, Company Securities; or

(B) financial instruments which provide exposure to a portfolio of assets which has, or may have, an exposure to Company Securities.

This is the case even if you do not intend to transact in Company Securities by making the relevant investment.

Further guidance

- If you are uncertain as to whether or not a particular transaction requires clearance, you must obtain guidance from the Company Secretary before carrying out that transaction.
- In the absence of the Company Secretary please speak to any Executive Director of Filtronic plc.

Part B – Additional Provisions for PDMRs

Circumstances for refusal

You will not ordinarily be given clearance to Deal in Company Securities during any period when there exists any matter which constitutes Inside Information or during a Closed Period.

Notification of transactions

You must notify the Company and the FCA in writing of every Notifiable Transaction in Company Securities conducted for your account as follows:

(A) Notifications to the Company must be made using the template in Schedule 3 and sent to the Company Secretary as soon as practicable and in any event within one business day of the transaction date. You should ensure that your investment managers (whether discretionary or not) notify you of any Notifiable Transactions conducted on your behalf promptly so as to allow you to notify the Company within this time frame.

(B) Notifications to the FCA must be made within three business days of the transaction date. A copy of the notification form is available on the FCA's website. If you would like, the Company Secretary can assist you with this notification, provided that you ask him or her to do so within [one business day] of the transaction date.

If you are uncertain as to whether or not a particular transaction is a Notifiable Transaction, you must obtain guidance from the Company Secretary.

PCAs and investment managers

You must provide the Company with a list of your PCAs and notify the Company of any changes that need to be made to that list.

You should ask your PCAs not to Deal (whether directly or through an investment manager) in Company Securities during Closed Periods and not to deal on considerations of a short-term nature. A sale of Company Securities which were acquired less than a year previously will be considered to be a Dealing of a short- term nature.

Your PCAs are also required to notify the Company and the FCA in writing, within the time frames given in paragraph 4.1, of every Notifiable Transaction conducted for their account. You should inform your PCAs in writing of this requirement and keep a copy; the Company Secretary will provide you with a letter that you can use to do this. If your PCAs would like, the Company Secretary can assist them with the notification to the FCA, provided that your PCA asks the Company Secretary to do so within [one business day] of the transaction date. A copy of the form for notifying the FCA is available on the FCA's website.

You should ask your investment managers (whether or not discretionary) not to Deal in Company Securities on your behalf during Closed Periods.

Schedule 1 Defined terms

'**Closed Period**' means any of the following:

(A) The period of 30 calendar days before the release of the preliminary announcement of the Company's annual results (or, where no such announcement is released, the period of 30 calendar days before the publication of the Company's annual financial report);

(B) The period of 30 calendar days before the release of the Company's half-yearly financial report.

'**Company Securities**' means any publicly traded or quoted shares or debt instruments of the Company (or of any of the Company's subsidiaries or subsidiary undertakings) or derivatives or other financial instruments linked to any of them, including phantom options.

'**Dealing**' (together with corresponding terms such as 'Deal' and 'Deals') means any type of transaction in Company Securities, including purchases, sales, the exercise of options, the receipt of shares under share plans, using Company Securities as security for a loan or other obligation and entering into, amending or terminating any agreement in relation to Company Securities (e.g. a Trading Plan).

'**FCA**' means the UK Financial Conduct Authority.

'**Inside Information**' means information which relates to the Company or any Company Securities, which is not publicly available, which is likely to have a non-trivial effect on the price of Company Securities and which an investor would be likely to use as part of the basis of his or her investment decision.

'**Investment Programme**' means a share acquisition scheme relating only to the Company's shares under which: (A) shares are purchased by a Restricted Person pursuant to a regular standing order or direct debit or by regular deduction from the person's salary or director's fees; or (B) shares are acquired by a Restricted Person by way of a standing election to re- invest dividends or other distributions received; or (C) shares are acquired as part payment of a Restricted Person's remuneration or director's fees.

'**Market Abuse Regulation**' means the EU Market Abuse Regulation (596/2014) as amended pursuant to The Market Abuse (Amendment) (EU Exit) Regulations 2019.

'**Notifiable Transaction**' means any transaction relating to Company Securities conducted for the account of a PDMR or PCA, whether the transaction was conducted by the PDMR or PCA or on his or her behalf by a third party and regardless of whether or not the PDMR or PCA had control over the transaction. This captures every transaction which changes a PDMR's or PCA's holding of Company Securities, even if the transaction does not require clearance under this code. It also includes gifts of Company Securities, the grant of options or share awards, the exercise of options or vesting of share awards and transactions carried out by investment managers or other third parties on behalf of a PDMR, including where discretion is exercised by such investment managers or third parties and including under Trading Plans or Investment Programmes.

'**PCA**' also '**CAP**' means a person closely associated with a PDMR being:

(A) The spouse or civil partner of a PDMR; or

(B) A PDMR's child or stepchild under the age of 18 years who is unmarried and

does not have a civil partner; or

(C) A relative who has shared the same household as the PDMR for at least one year on the date of the relevant Dealing; or

(D) A legal person, trust or partnership, the managerial responsibilities of which are discharged by a PDMR (or by a PCA referred to in paragraphs (A), (B), or (C) of this definition), which is directly or indirectly controlled by such a person, which is set up for the benefit of such a person or which has economic interests which are substantially equivalent to those of such a person.

'**PDMR**' means a person discharging managerial responsibilities in respect of the Company, being either:

(A) A director of the Company; or

(B) Any other employee who has been told that he or she is a PDMR.

'**Restricted Person**' means:

(A) A PDMR; or

(B) Any other person who has been told by the Company that the clearance procedures in Part A of this code apply to him or her.

'**Trading Plan**' means a written plan entered into by a Restricted Person and an independent third party that sets out a strategy for the acquisition and/or disposal of Company Securities by the Restricted Person, and:

(A) Specifies the amount of Company Securities to be dealt in and the price at which and the date on which the Company Securities are to be dealt in; or

(B) Gives discretion to that independent third party to make trading decisions about the amount of Company Securities to be dealt in and the price at which and the date on which the Company Securities are to be dealt in; or

(C) Includes a method for determining the amount of Company Securities to be dealt in and the price at which and the date on which the Company Securities are to be dealt in.

Schedule 2

Clearance application template

Filtronic plc (the '**Company**')

Application for clearance to deal

If you wish to apply for clearance to deal under the Company's dealing code, please complete sections 1 and 2 of the table below and submit this form to the Company Secretary. By submitting this form, you will be deemed to have confirmed and agreed that:

(i) The information included in this form is accurate and complete;

(ii) You are not in possession of inside information relating to the Company or any Company Securities;

(iii) If you are given clearance to deal and you still wish to deal, you will do so as soon as possible and in any event within two business days; and

(iv) If you become aware that you are in possession of inside information before you deal, you will inform the Company Secretary and refrain from dealing.

Application Form for Clearance to Deal under Part A of the Filtronic plc Group Share Dealing Policy

1.	**Applicant**	
a)	Name	
b)	Contact details	*[For executive directors and other employees, please include email address and extension number.]* *[For non-executive directors, please include email address and telephone number.]*
2.	**Proposed dealing**	
a)	Description of the securities	*[e.g. a share, a debt instrument, a derivative or a financial instrument linked to a share or debt instrument.]*
b)	Number of securities	*[If actual number is not known, provide a maximum amount (e.g. 'up to 100 shares' or 'up to £1,000 of shares').]*
c)	Nature of the dealing	*[Description of the transaction type (e.g. acquisition; disposal; subscription; option exercise; settling a contract for difference; entry into, or amendment or cancellation of, an investment programme or trading plan).]*
d)	Other details	*[Please include all other relevant details which might reasonably assist the person considering your application for clearance (e.g. transfer will be for no consideration).]* *[If you are applying for clearance to enter into, amend or cancel an investment programme or trading plan, please provide full details of the relevant programme or plan or attach a copy of its terms.]*

Schedule 3

Notification template for PDMRs and their closely associated persons (PCAs also CAPs)

Filtronic plc (the '**Company**') Transaction notification

The form is electronic, and it is submitted by the PDMR, directly to the FCA, online, via this link:
https://marketoversight.fca.org.uk/electronicsubmissionsystem/MaPo_PDMR_Introduction

After submission, please send your completed form to the Company Secretary, and in the Company's Secretary's absence, please send it to the CFO. The contents of the form (example set out below) will be announced by the Company via RNS.

If you require any assistance in completing this form, please contact the Company Secretary or the CFO.

1.	**Details of PDMR / person closely associated with them ('PCA')**	
a)	Name	[*Include first name(s) and last name(s).*] [*If the PCA is a legal person, state its full name including legal form as provided for in the register where it is incorporated, if applicable.*]
2.	**Reason for Notification**	
a)	Position / status	*For PDMRs, state job title e.g. CEO, CFO.*] [*For PCAs, state that the notification concerns a PCA and the name and position of the relevant PDMR.*]
b)	Initial notification / amendment	[*Please indicate if this is an initial notification or an amendment to a prior notification. If this is an amendment, please explain the previous error which this amendment has corrected.*]
3.	**Details of the Issuer**	
a)	Name	Filtronic plc
4.	**Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted**	
a)	Description of the financial instrument	[*State the nature of the instrument e.g. a share, a debt instrument, a derivative or a financial instrument linked to a share or debt instrument.*]
	Identification	GB0003362992

b)	Nature of the transaction	[*Description of the transaction type e.g. acquisition, disposal, subscription, contract for difference, etc.*] [*Please indicate whether the transaction is linked to the exercise of a share option programme.*] [*If the transaction was conducted pursuant to an investment programme or a trading plan, please indicate that fact and provide the date on which the relevant investment programme or trading plan was entered into.*]
c)	Price(s) and volume(s)	[*Where more than one transaction of the same nature (purchase, disposal, etc.) of the same financial instrument are executed on the same day and at the same place of transaction, prices and volumes of these transactions should be separately identified in the table above, using as many lines as needed. Do not aggregate or net off transactions.]* [*In each case, please specify the currency and the metric for quantity.*]
d)	Aggregated information - Aggregated volume - Price	[*Please aggregate the volumes of multiple transactions when these transactions:* *– relate to the same financial instrument;* *– are of the same nature;* *– are executed on the same day; and* *– are executed at the same place of transaction.*] [*Please state the metric for quantity.*] [*Please provide:* *– in the case of a single transaction, the price of the single transaction; and* *– in the case where the volumes of multiple transactions are aggregated, the weighted average price of the aggregated transactions.*] [*Please state the currency.*]
e)	Date of the transaction	*Date of the particular day of execution of the notified transaction, using the date format: YYYY-MM-DD and please specify the time zone.*]
f)	Place of the transaction	[*Please name the trading venue where the transaction was executed. If the transaction was not executed on any trading venue, please state 'outside a trading venue' in this box.*]

Filtronic plc

Closed Circuit Television ("CCTV") Policy

Policy statement

Filtronic (which includes Filtronic plc, and its UK trading subsidiaries, Filtronic Broadband limited and Filtronic Wireless Ltd., referred to collectively in this policy as "we") believes that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all our staff and visitors. Additionally, following a recent assessment by an independent assessor, it was recommended that installation of a CCTV system in Yeadon was deemed to be critical to protect the security of Filtronic' s business and buildings. However, we recognise that this may raise concerns about the effect on individuals and their privacy. This policy is intended to address such concerns. Images recorded by surveillance systems are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring that the legal rights of staff, relating to their personal data, are recognised and respected.

This policy is intended to assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence.

Definitions

For the purposes of this policy, the following terms have the following meanings:

CCTV: means cameras designed to capture and record images of individuals and property.

Data: is information which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screen shots.

Data subjects: means all living individuals about whom we hold personal information as a result of the operation of our CCTV.

Personal data: means data relating to a living individual who can be identified from that data (or other data in our possession). This will include video images of identifiable individuals.

Data controllers: are the people who, or organisations which, determine the manner in which any personal data is processed. They are responsible for establishing practices and policies to ensure compliance with the law. We are the data controller of all personal data used in our business for our own commercial purposes.

Data users: are those of our employees whose work involves processing personal data. This will include those whose duties are to operate CCTV cameras and other surveillance systems to record, monitor, store, retrieve and delete images. Data users must protect the data they handle in accordance with this policy and our Data Protection Policy.

Data processors: are any person or organisation that is not a data user (or other employee of a data controller) that processes data on our behalf and in accordance with our instructions (for example, a supplier which handles data on our behalf).

Processing: is any activity which involves the use of data. It includes obtaining, recording or holding data, or carrying out any operation on the data including organising, amending,

retrieving, using, disclosing or destroying it. Processing also includes transferring personal data to third parties.

Surveillance systems: means any devices or systems designed to monitor or record images of individuals or information relating to individuals. The term includes CCTV systems as well as any technology that may be introduced in the future such as automatic number plate recognition (ANPR), body worn cameras, unmanned aerial systems and any other systems that capture information of identifiable individuals or information relating to identifiable individuals.

About this policy

We currently use CCTV on our premises in Sedgefield and we use CCTV cameras within our demise and reception area at our Yeadon premises. There are other CCTV cameras around the Sedgefield site, but these are controlled by Durham County Council ("DCC") and subject to DCC's privacy policies. This policy outlines why Filtronic uses CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice.

We recognise that information that we hold about individuals is subject to data protection legislation. The images of individuals recorded by CCTV cameras in the workplace are personal data and therefore subject to the legislation covering data protection, including the General Data Protection Regulation (GDPR).

This policy covers all employees, directors, officers, consultants, contractors, volunteers, interns, casual workers, zero hours workers and agency workers, and may also be relevant to visiting members of the public.

This policy is non-contractual and does not form part of the terms and conditions of any employment or other contract. We may amend this policy at any time. The policy will be regularly reviewed to ensure that it meets legal requirements.

Personnel responsible

The Filtronic plc Chief Executive Officer has overall responsibility for ensuring compliance with relevant legislation and the effective operation of this policy. Day-to-day management responsibility for deciding what information is recorded, how it will be used and to whom it may be disclosed has been delegated to the Filtronic IT Manager. Day-to-day operational responsibility for CCTV cameras and the storage of data recorded is the responsibility of the IT Department (delegated to the Data Controller in Yeadon and the Security Officer in Sedgefield).

Responsibility for keeping this policy up to date has been delegated to the Filtronic IT Manager supported by the Director of HR and General Counsel.

Reasons for the use of CCTV

We currently use CCTV as outlined below. We believe that such use is necessary for legitimate business purposes, including:

- To prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- For the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- To support law enforcement bodies in the prevention, detection and prosecution of crime;
- To assist in day-to-day management, including ensuring the health and safety of

staff and others;
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- To demonstrate compliance with minimal security requirements to carry out work of a sensitive nature for particular customers.

This list is not exhaustive and other purposes may be or become relevant.

Monitoring

CCTV monitors the exterior of the building and both the main entrance and secondary exits in Yeadon as well as inside the strong rooms in both Yeadon and Sedgefield. In addition, DCC monitors the exterior and points around the secure room at the Sedgefield site This data is continuously recorded 24 hours a day.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property but the CCTV coverage might incorporate the car parks and other areas around the Filtronic property.

Surveillance systems will not be used to record sound.

Images are monitored by authorised personnel. This monitoring is undertaken when required, not as a standard function.

Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

How we will operate any Filtronic CCTV

Where Filtronic's CCTV cameras are placed in the workplace, we will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. Such signs will contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.

We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters. Recorded images will only be viewed in designated, secure offices. Live and recorded images may be viewed remotely over the internet during and immediately following the activation of the intruder alarm system.

Use of data gathered by CCTV

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

Retention and erasure of data gathered by CCTV

Data recorded by the CCTV system will be stored digitally using an onsite server. Cloud computing will not be used. Data from CCTV cameras will not be retained indefinitely but in will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough only for incidents to come to light. In the normal course and in all other cases, recorded images will be kept for no longer than sixty (60) days. We will maintain a comprehensive log of when data is deleted.

At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.

Use of additional surveillance systems

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate by carrying out a privacy impact assessment (**PIA**).

A PIA is intended to assist us in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

Any PIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in changing rooms) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns.

Covert monitoring

We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.

In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the Chief Executive OR General Counsel. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision.

Only limited numbers of people will be involved in any covert monitoring.

Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.

Ongoing review of CCTV use

We will ensure that the ongoing use of existing CCTV cameras in the workplace is reviewed periodically to ensure that their use remains necessary and appropriate, and that any surveillance system is continuing to address the needs that justified its introduction.

Requests for disclosure

No images from our CCTV cameras will be disclosed to any third party, without express permission being given by the Filtronic Chief Executive Officer. Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.

In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

We will maintain a record of all disclosures of CCTV footage.

No images from CCTV will ever be posted online or disclosed to the media.

Subject access requests

Data subjects may make a request for disclosure of their personal information and this may include CCTV images (**data subject access request**). A data subject access request is subject to the statutory conditions from time to time in place and should be made in writing, in accordance with Filtronic's Data Protection Policy.

In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.

Complaints

If any member of staff has questions about this policy or any concerns about our use of CCTV, then they should speak to their manager OR the Director of HR in the first instance.

Where this is not appropriate, or matters cannot be resolved informally, employees should use our formal grievance procedure.

Requests to prevent processing

We recognise that, in rare circumstances, individuals may have a legal right to object to processing and in certain circumstances to prevent automated decision making (see Articles 21 and 22 of the General Data Protection Regulation). For further information regarding this, please contact Filtronic's Director of HR.

Approved by the Board of Filtronic plc

30 October 2026

Filtronic plc

Whistleblowing Policy

Filtronic plc ("the Company") together with its subsidiary companies (herein "Filtronic") believe it is important that any criminal behaviour or other wrongdoing by an employee or worker (in whatever position) undertaking work with any company in the group is reported and properly dealt with. Filtronic is committed to ensuring that no member of staff should fear disadvantage from raising legitimate concerns.

This policy (and the procedure below) applies to all employees, former employees, contractors, subcontractors or agents of Filtronic plc and its subsidiaries ('Workers').

The purpose of this procedure is to provide a framework to promote responsible whistleblowing. Whistleblowing is the reporting by workers of any malpractice or illegal act or omission by other workers.

Filtronic has established by this procedure a channel for communication of concerns that is independent, so far as is practicable, from the management of the Company.

Relationship of this Procedure to the Company's other Policies and Procedures

Filtronic's policies and procedures on grievance, discipline, harassment, etc. should be used in most situations. The use of this procedure should be restricted to where you reasonably believe one of the following has occurred, is occurring, or is likely to occur:

- A criminal offence, including fraud, bribery or corruption;
- Disregard for legislation, particularly in relation to health and safety at work;
- Malpractice, or ill treatment of a customer by a member of staff;
- Damage to the environment;
- Any other serious irregularity; or
- Deliberate concealment of any of the above
- Any matter of sufficient seriousness that cannot reasonably be addressed using Filtronic's grievance, discipline and harassment policies and procedures.

Whistleblowing should not be used in place of Filtronic's grievance procedures or be a route for raising malicious or unfounded allegations. Only those who use this policy in good faith will be protected under it (see below).

The Designated Officers

The following persons are the Designated Officers under this procedure.

Pete Magowan	Email: pete.magowan@filtronic.com
Non-Executive Director	
John Behrendt	Email: john.behrendt@filtonic.com
Non-Executive Director	

Raising a Concern – The Line Manager Route

You should normally raise concerns about wrongdoing and malpractice with your immediate manager first, who will notify the matter to one of the Designated Officers.

Raising a Concern – The Designated Officer Route

If the matter is of a very serious nature, such as an allegation of fraud involving a Filtronic plc director, or if it involves your immediate manager, you may notify one of the Designated Officers directly. You must include the words 'Whistleblowing' in the subject heading of the email or letter you send.

The Investigative Stages

The Designated Officer will, if requested, arrange an initial interview. At this stage, you will be asked whether you wish your identity to be disclosed (You may not make anonymous complaints to the Designated Officer but your identity may remain confidential to the Designated Officer, as far as is reasonably practicable). You will also be asked whether or not you wish to make a written or oral statement. In either case, the Designated Officer will write a brief summary of the interview, which will be agreed by both parties.

The Designated Officer will report to both the Chair of Filtronic plc and the other Designated Officers to the extent appropriate, having regard to the subject matter.

The Designated Officers and the Chair (to the extent appropriate, having regard to the subject matter), will together decide on what further investigation, if any, should take place. They will report back to you within 10 working days of your interview or receipt of your complaint, whichever is the later.

Where, exceptionally, the complaint is about the Chair of Filtronic plc, the Designated Officers will decide on how to proceed. This may include an external investigation. Again, you will be informed of progress within 10 working days.

The Investigation

It may be necessary that certain investigations will be carried out in strict confidence (with the employee under investigation not being informed until necessary). In certain other circumstances, the employee may have to be suspended pending the investigation.

If the investigation shows there is a case to answer, the Company's Disciplinary Procedure will be invoked against the employee concerned.

If there is found to be no case to answer, the Designated Officer will ensure that you are protected, provided the disclosure was made in good faith. Only where you are found to have made false allegations maliciously will the Disciplinary Procedure be invoked against you.

Inquiries

If the concern raised is very serious or complex, an inquiry may be held.

Following the Investigation

The Designated Officer, possibly in conjunction with the Chair, will arrange a meeting with you to give feedback on the investigation (This will not include details of any disciplinary action, which will remain confidential to the individual concerned). The feedback will be provided within 10 working days of the conclusion of the investigation and any inquiry.

If you are not satisfied with the outcome of the investigation, Filtronic recognises your right to make disclosures to prescribed regulators, or, where justified, elsewhere.

The Law

This procedure has been written to take account of the UK's Employment Rights Act (Part IVA Whistleblowing Provisions) 1996, as amended from time to time, that protects workers making good faith disclosures about certain matters of concern.

Protection of Whistleblowers

Filtronic will not tolerate any harassment, victimisation or discrimination of a good faith whistleblower and will treat this as a serious disciplinary offence. The whistleblower's rights against retaliation are fully recognised by Filtronic.

Approved by the Board of Filtronic plc

30 October 2026