Material Topic

BUSINESS CONDUCT

Upholding strong governance and ethical conduct through accountability, transparency, risk management, and global stakeholder engagement.

GOALS AND TARGETS

- Zero legal cases of non-compliance with international and local laws on corruption and anti-trust
- Zero cybersecurity breaches or incidents
- Increase the number of effective engagements with NGOs in major countries of operation and where there is a greater risk of human rights violations within the supply chain

PROGRESS

- Zero legal cases of non-compliance with international and local laws on corruption and anti-trust
- Zero cases of leaks, theft, or loss of customer and personal data
- Increased diversification and localization of manufacturing, warehousing, and the supply chain across the globe

VALUE CHAIN

- Suppliers
- Customers
- Operations
- Community

How We Are Managing It

TTI's governance framework is anchored in the ethical principles outlined in the Company's CoC. The CoC provides clear guidance for conducting business with integrity and accountability and is accessible to all associates. It reinforces compliance with global legal standards, supports the protection of human rights, and outlines procedures for identifying and managing conflicts of interest.

Alongside the CoC are additional policies that govern business conduct and ensure compliance across operations and supply chains. These include, but are not limited to, the Anti Corruption Policy, Trade Compliance Policy, and Anti Trust Policy, each designed to uphold adherence to international and local regulations while promoting ethical practices throughout the organization.

Employees engage with our CoC and other policies through resources such as our e-learning platform and in-person training. All policies are regularly reviewed to ensure their provisions align with laws and regulations and are available in 22 languages, ensuring understanding across all subsidiaries. A full list of policies and standards can be found on our corporate website.

The protection of our data and digital infrastructure is an essential part of TTI's governance approach. Cybersecurity measures are implemented to safeguard customers, employees, suppliers, and business systems from potential threats. These measures include ongoing monitoring of industry breaches, integrating cybersecurity

into business planning and system testing, conducting regular employee training, maintaining compliance with applicable regulations, and continuously enhancing data protection standards across the supply chain.

Our operations are supported by emergency response plans and policies that help ensure business continuity and minimize disruptions in the event of unforeseen incidents. To further strengthen accountability and transparency, we integrate risk mitigation and sustainability principles into our supply chain practices. Supplier assessments are conducted from ethical, environmental, and social perspectives to ensure alignment with TTI's standards and values. Quality and reliability remain key priorities in supplier selection, supported by a collaborative review process involving the sustainability, finance, legal, and procurement teams. This process ensures that potential suppliers meet essential criteria, including:

- Financial stability
- Respect for working hours and freedom of association
- Prevention of unethical labor practices, harassment, abuse, and discrimination
- Compliance with health and safety standards
- Provision of fair wages and benefits
- Demonstration of environmental stewardship

Aligned with our values, codes, and policies, TTI fully supports the United Nations Guiding Principles on Business and Human Rights. All suppliers are required to comply with applicable laws, including minimum wage regulations, and to adhere to the standards and expectations outlined in our contracts and purchase orders.

We maintain a strict stance against corruption, bribery, and forced labor within the supply chain, supported by compliance monitoring and investigative mechanisms that assess adherence to our ethical and human rights requirements.

At a minimum, suppliers are expected to implement policies consistent with ISO principles and to establish management systems addressing anti-corruption, pollution control, waste management, resource conservation, and human rights. These systems must include relevant environmental, health, and safety certifications.

To enhance accountability and drive improvement, we collaborate with non-governmental organizations and multi stakeholder groups such as the Responsible Business Alliance (RBA), Responsible Minerals Initiative (RMI), Responsible Labor Initiative (RLI), Better Mining Initiative, and The Mekong Club. Through these partnerships, we advance initiatives promoting renewable energy, recycling, and the responsible sourcing of conflict minerals and cobalt.

We enforce a zero-tolerance policy on forced labor of any kind and maintain rigorous oversight to prevent modern slavery and human trafficking. Ongoing efforts focus on sourcing and producing goods closer to markets while reducing our dependence on single suppliers in critical areas.

Compliance and Risk Management

TTI's risk management and compliance function defines the policies, training protocols, and regulatory interpretations that guide our operations. These programs are enforced by management, internal audit, and other risk management groups across the organization to ensure consistent adherence to legal and ethical standards.

Our Group Senior Vice President and Chief Counsel of Global Compliance leads global compliance initiatives and reports directly to the Head of Group Legal, Compliance, and Corporate Governance. The Board receives regular updates on risk management priorities and emerging compliance issues to maintain oversight and accountability.

Regional legal, finance, and compliance teams provide continuous support to uphold effective governance. The Global Trade Compliance function plays a key role in screening and evaluating business partners to ensure they are not denied, debarred, sanctioned or otherwise restricted by relevant authorities. Our Global Trade Compliance Policy provides detailed guidance on export and import control laws, regulations, and economic sanctions that apply to both the Company and its suppliers.

To maintain strong compliance awareness, continuous training is provided on key business conduct topics to ensure legal and compliance teams remain informed of the latest regulatory standards.

Anti-Corruption

TTI strategically works against corruption of all forms by promoting ethical conduct, transparency, and accountability across its operations and value chain. This approach is reinforced through the Company's Anti-Corruption Policy, which provides structured guidance for identifying and managing corruption risks. The policy addresses topics such as gifts and entertainment, company sponsored travel, political and charitable contributions, and engagement with business partners to minimize exposure to corruption related risks. Aligned with international anti-bribery standards, the policy reflects TTI's commitment to integrity and responsible business practices. To strengthen awareness and help prevent anti-corruption, a mandatory online training module is provided alongside the policy to reinforce key principles and expectations. Relevant associates complete training at least once every two years, or sooner if policy updates occur.

Internal controls are embedded within accounting processes and record-keeping systems, and they are evaluated during audits to ensure effectiveness in reducing fraud and corruption risks. Regular internal reviews evaluate the effectiveness of anti-corruption and anti-bribery measures, with results reported to senior management and the Audit Committee. Annually, an enterprise wide risk assessment is performed to inform the development of the annual internal audit plan. The risk assessment covers operational, financial, compliance, and fraud-related risks.

Since 2019, TTI has collaborated with the China Enterprise Anti-Fraud Alliance as part of its commitment to combating corruption throughout the supply chain through our Social and Environmental Responsibility (SER) compliance program. A comprehensive list of legal and regulatory requirements related to anti-corruption practices is available in Appendix A of our HKEX ESG Reporting Guide Content Index on our website.

Anti-Trust

TTI actively promotes fair competition and compliance with global trade laws through the implementation of its Anti-Trust Policy. The policy provides a comprehensive framework for understanding legal obligations and the Company's standards for ethical business conduct. It establishes clear principles for complying with applicable laws, regulations, and internal codes related to anti-competitive behavior.

Applicable to all employees, officers, directors, consultants, agents, temporary workers, and contractors, the policy defines prohibited practices, outlines potential penalties for non-compliance, and addresses improper agreements or exchanges involving competitors. To strengthen understanding, it also provides illustrative examples and responses, ensuring that associates can apply the principles of fair competition in their daily work.

The Company reported zero substantive complaints by suppliers and zero confirmed legal cases of money laundering, insider trading, corruption, or monopoly practices. To reinforce our ethical culture, 95% of employees received training in anti-corruption and anti-trust compliance, further embedding responsible business conduct across our global operations.

Complaint Resolution

TTI provides clear and accessible channels for reporting concerns or potential misconduct. Associates, suppliers, customers, and other stakeholders are encouraged to raise complaints or ethical concerns through established reporting mechanisms. This process is supported by our Whistleblower Policy, which empowers individuals to report actual or perceived violations confidentially and, where permitted by law, anonymously through a trusted third-party service provider.

Our comprehensive training equips associates with the necessary knowledge on how to manage and escalate complaints appropriately. The Senior Vice President and Chief Counsel for Global Compliance receives and reviews all reports, collaborating with relevant departments to conduct fair and thorough investigations. To preserve impartiality, any matter involving the Senior Vice President and Chief Counsel for Global Compliance and/or General Counsel is independently evaluated by the Group CFO.

To safeguard those who speak up, confidentiality is maintained throughout the reporting process, and retaliation is strictly prohibited. Each report is assessed to by the Legal department to determine its severity and scope before a formal investigation is initiated, including engagement with Human Resources, Internal Audit, and other business functions as appropriate. All cases are documented to ensure transparency and enable effective resolution.

Information on complaints and related corrective actions is regularly communicated to management and the Audit Committee. The Company's Complaint Resolution Policy formalizes these procedures, outlining the process for reporting, investigation, and resolution while reinforcing our commitment to compliance, integrity, and the protection of individuals who act in good faith.

Reporting Violations

A third-party-operated complaint hotline is available for suppliers and business partners to report potential policy violations, ethical concerns, or sustainability-related issues. Reports are promptly reviewed, investigated, and addressed with appropriate corrective actions to ensure accountability and compliance across our value chain.

Data Protection and Cybersecurity

Robust measures are in place to prevent cybersecurity breaches and protect the integrity of our digital landscape. These comprehensive measures cover our customers, employees, suppliers, products, and networks, ensuring that data and system controls strengthen resilience across all operations. Our cybersecurity governance structure includes a dedicated management team and specialized units responsible for cloud operations, risk management, and incident response, ensuring accountability at every level. Different entities within our organization implement tailored cybersecurity and data protection policies based on their specific business needs, ensuring flexibility without compromising security. Our Cybersecurity Management Team provides regular updates to the Audit Committee to ensure consistent oversight and accountability.

During the reporting year, there were zero reported incidents involving breaches of customer privacy or data loss, alongside a 30% year-over-year increase in the total number of data protection and cybersecurity training sessions completed.

Personal information is protected by embedding strong privacy governance across our operations. Our Privacy Policy outlines how personal data is collected, used, and safeguarded throughout its lifecycle, ensuring it is handled lawfully, transparently, and only for legitimate business purposes. Individuals are informed of their rights and provided clear channels to contact us regarding how their data is managed. Data protection is embedded within our organizational governance and operational practices, supported by routine simulations and testing to evaluate incident response readiness. Security programs are regularly reviewed and enhanced to adapt to emerging risks, with nearly 45,000 company devices monitored in real time for potential attacks and indicators of compromise.

We maintain compliance with major data protection regulations, including the European Union's General Data Protection Regulation (GDPR) and the California Consumer Privacy Act. To further enhance our capabilities, business units across North America, Asia, ANZ, and Europe have conducted Cybersecurity GAP Assessments aligned with the National Institute of Standards and Technology framework.

Cloud Operations and Operational Continuity

Our cloud infrastructure approach is designed to strengthen operations and safeguard business continuity through diversified planning and rigorous governance standards. We maintain comprehensive contingency plans, recovery protocols, and continuous monitoring to minimize potential downtime from service disruptions. Regular testing and scenario planning ensure preparedness for emerging risks, while lessons from industry-wide outages have informed enhancements to disaster recovery and escalation procedures. Provider selection is informed by reliability, compliance, and risk management criteria, aligning with our cybersecurity and ESG commitments. While we expect outages to remain infrequent, we proactively maintain strategies to mitigate impact. The most significant IT risks we monitor include evolving cyber threats, third-party vulnerabilities, and operational disruptions, all addressed through layered defenses and ongoing risk assessments to protect stakeholders and maintain trust.

Intellectual Property

Intellectual property protection is an integral part of our cybersecurity and governance framework. We safeguard patents, trademarks, software, copyrights, and trade secrets through established controls, monitoring, and compliance practices. These measures support ethical business conduct, innovation, and long-term value creation. Employee training further reinforces respect for both company-owned and third-party intellectual property rights, promoting responsible technology use and fair competition across our ecosystem.

Supply Chain Governance

Strong governance within the supply chain is essential to maintaining responsible and compliant operations. TTI enforces clear expectations for suppliers through structured measures that ensure adherence to environmental, social, and regulatory standards. Internally, we have strengthened responsible sourcing practices through enhanced screening, supplier relationship mapping, training programs, including procurement and compliance sessions conducted in partnership

with our Group Director of Responsible Sourcing. We also maintain regular engagement with business units to ensure alignment on sourcing standards.

Our supply chain governance framework includes acknowledgment of the BPCoC, participation in compliance surveys, regular audits, and the issuance of Corrective Action Plans (CAPs) when non-compliance is identified.

Additionally, suppliers are required to acknowledge our Policy Against Modern Slavery and Human Trafficking and complete an annual survey to assess related risks. Comprehensive supplier reviews are conducted through in-person audits led by SER compliance, quality, and sourcing teams, or by external auditors when necessary.

Supplier due diligence applies to potential, new, and existing partners. Before onboarding, potential suppliers undergo a pre-assessment by the Asia procurement team to evaluate ISO/TS16949 certifications, inspection procedures, quality management practices, supplier relationship mapping, as well as global trade and sanctions screening.

Number of Suppliers by Geographical Region

EMEA
255

NORTH AMERICA
801

ASIA
1,112

Direct Suppliers Globally
2,190

ANZ
22
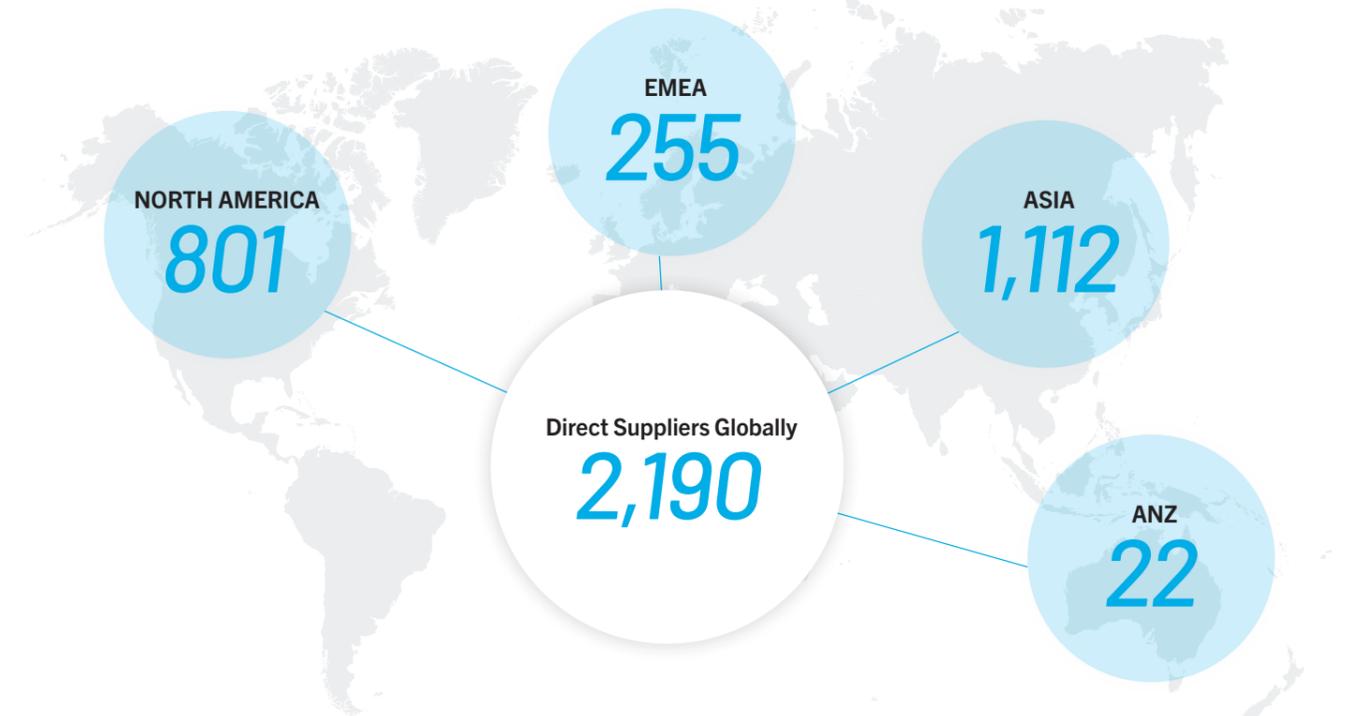
Selected suppliers then move to a formal factory audit conducted by the divisional Quality Audit team, assessing process control, environmental management, factory security, and product quality to determine an overall score.

Existing suppliers are reviewed annually using similar criteria, with additional assessments covering human resource systems, personnel safety, and production realization. If a finding is discovered during an audit, a follow-up review is conducted, and a CAP is issued to address root causes, corrective actions, and preventative measures. The ongoing status is monitored until the CAP is completed. Supplier scorecards are based on implementation effectiveness. For example, a supplier would be categorized as having "No System" if they lack SOPs aligning with ISO/TS16949 or other regulatory standards.

Recent assessments have not identified forced-labor risk indicators within the tiers where visibility has been established. We are enhancing our mapping and due-diligence coverage across deeper tiers, including Tier 2 and beyond, and will update our findings as this work progresses. Ongoing due diligence, monitoring, and assessments are conducted to uphold ethical sourcing and compliance across our global operations.

Through strategic supplier engagement we build supplier relationships that strengthen performance and deliver shared value. TTI earned key strategic partner recognitions for excellence in supply chain performance, including Home Depot's D25P Partner of the Year. These honors reflect our commitment to operational efficiency, reliability, and strong supplier partnerships across the value chain.

Supplier Risk Framework

Our supplier risk management framework leverages two systems: one for initial screening which is our Global Supply Chain ESG Compliance Monitoring Platform and another for in-depth analysis across multiple tiers which is our Social and Environmental Compliance and Auditing system.

Global Supply Chain ESG Compliance Monitoring Platform

To strengthen transparency and accountability across our value chain, TTI utilizes a global ESG compliance monitoring platform that enhances sustainability performance and regulatory alignment within the supply chain. The system automates supplier data collection and verification, streamlining due diligence and significantly reducing administrative workload. This technology enables real-time tracking of compliance metrics, helping us meet evolving regulatory requirements and customer expectations on ESG standards. Key functions of the platform include:

- **Supplier Assessments:** Identifying high-risk suppliers and areas within the supply chain requiring closer evaluation

- **ESG Risk Monitoring:** Tracking risks related to human rights and other ESG factors to ensure supplier compliance with established criteria

- **Reporting Tools:** Generating visual dashboards that automate ESG reporting, provide comparable data, and support strategic decision-making for supply chain sustainability

Beyond compliance, the platform promotes collaboration with suppliers to improve ESG performance, fostering a more sustainable and resilient global supply chain.

Social and Environmental Compliance and Auditing

The SER Compliance Program ensures that the ESG practices of potential and existing partners align with TTI's standards and international regulations. Serving as a reference point for compliance with frameworks such as the National Environmental Policy Act and related U.S. federal laws, the program employs internal and third party audits to evaluate adherence to environmental, social, and ethical requirements.

Before onboarding new suppliers, an initial audit is conducted to confirm compliance with our expectations. Follow-up audits occur every 12 to 18 months to verify continued alignment. These reviews assess key areas such as occupational health and safety, ethics and integrity, environmental protection, and human rights. The scope includes, but is not limited to:

- Supply Chain Responsibility

- Conflict of Interest

- Management and Ownership

- Quality Management

- Energy Management

- Cybersecurity and Data Protection (aligned with GDPR)

- Conflict Minerals, Cobalt, and Mica

- Business Continuity

- Carbon Footprint

When cases of non-compliance are identified, a CAP is implemented to address the findings. Suppliers under active CAPs collaborate with TTI to close gaps through additional training and more frequent follow-up audits. Persistent or unresolved violations may result in the discontinuation of supplier relationships to maintain the integrity of our supply chain.

In 2025, 602 supplier audits were conducted, resulting in 456 CAPs issued to reinforce accountability and strengthen supplier ESG systems. Audits are carried out by TTI's SER compliance, quality, and sourcing teams, as well as certified third-party auditors. We utilize recognized social audit methodologies, including the Sedex Members Ethical Trade Audit (SMETA) and the Business Social Compliance Initiative (BSCI) by amfori. Audits are conducted by independent firms approved by the Association of Professional Social Compliance Auditors. To date, TTI-owned sites have completed SMETA audits, and suppliers have undergone either SMETA or BSCI audits. Findings from these audits contribute to industry knowledge sharing and promote higher standards across the global supply chain.

Complementing these efforts, the SER online compliance platform enables suppliers to acknowledge key requirements and policies while allowing TTI to monitor performance and risks more efficiently. As part of our SER compliance program, all suppliers are required to sign an annual declaration confirming their understanding of and adherence to TTI's SER policies and standards. Annual supplier risk assessments are supported by global indices, including the GRI Index, Corruption Index, and Human Development Index, as well as partnership with the Mekong Club, membership in the Responsible Business Alliance (RBA), and Better Mining Initiative.

A risk-based approach helps ensure our supply chain compliance management. Using advanced risk intelligence and mapping tools, we evaluate supplier relationships beyond direct vendors to include sub-suppliers and other critical partners. This multilayered visibility allows us to proactively identify high-risk entities, assess compliance gaps, and monitor emerging ESG issues across the value chain. The insights gained from these evaluations inform strategic decision making and strengthen our ability to safeguard against potential disruptions, ethical breaches, and environmental non-compliance.

Responsible Mineral Procurement

Our products, which include electronic components and batteries, may contain rare minerals that require stringent and responsible procurement practices. To address potential risks, we carry out supplier assessments, advocate for best practices, incorporate risk analysis into our procurement process, and actively participate in industry partnerships. Our Conflict Minerals Policy and Cobalt and Mica Procurement policies require that all tantalum, tin, tungsten, gold, and cobalt originate from reputable sources or certified conflict-free entities.

Suppliers are required to acknowledge and adhere to these policies by submitting annual conflict minerals and cobalt reporting templates that outline their sourcing practices. This information is reviewed and shared with sourcing leaders through our online SER compliance platform.

Our commitment to responsible sourcing and the protection of human rights has expanded significantly through memberships in global social responsibility organizations like the RBA and The Mekong Club. Within the RBA, we actively participate in various programs, such as the Responsible Labor Initiative (RLI), which fosters collaborative, cross-industry efforts to help address the underlying causes of forced labor. The RLI offers specialized services and tools to help establish company-level due diligence programs.

Our memberships grant us access to crucial resources, such as Reasonable Country of Origin data. This information is verified through the RBA's Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP), which employs an independent third-party assessment to evaluate smelter and refiner management systems and sourcing practices, to determine conformance with RMAP standards. Additionally, our involvement in industry groups has facilitated participation in community impact initiatives, such as the Better Mining Initiative. This program is mineral-agnostic and focuses on assurance and capacity building to enhance conditions at artisanal and small-scale mining (ASM) sites in both the Democratic Republic of Congo and Rwanda.

Better Mining

In 2025, TTI supported Better Mining's cobalt and copper monitoring program in the Democratic Republic of Congo. Through this partnership, Better Mining conducted daily monitoring of human rights, legal compliance, and health and safety risks across select ASM sites. Identified risks were addressed through targeted corrective action and verified through on-site follow-up.

Better Mining operated across four ASM cobalt and copper mine sites, collectively supporting approximately 15,000 workers. The implementation of corrective actions contributed to improvements in environmental management, pit safety, worker registration, and ongoing efforts to prevent child labor.

Better Mining also continued to support the development of Entreprise Générale du Cobalt (EGC), a subsidiary of Gécamines, which is mandated to centralize the purchasing and export of artisanal cobalt and other strategic minerals. In 2025, EGC secured five mining squares in Lualaba to develop a pilot site for responsibly sourced ASM cobalt and copper, aligned with DRC government objectives and international standards.

Better Mining was also able to refine its digital traceability tools for the ASM cobalt and copper context and delivered a concept note to EGC outlining an upstream assurance mechanism to support responsible production.

As part of this broader engagement, TTI donated personal protective equipment (PPE) to Better Mining. The PPE will support artisanal miners operating at EGC's Tombolo pilot site upon commencement of production in 2025, contributing to improved safety conditions in an environment where access to protective equipment is often limited.