



GCT Policy Statement

GCT supports the EICC Code of Conduct (“the Code”) and actively pursues conformance to the Code and its standards in accordance with our quality management system. GCT regards the Code as a total supply chain initiative, and we actively require our next tier suppliers to acknowledge and implement the Code.

Fundamental to adopting the Code is the understanding that GCT, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which we operate. Furthermore, and in compliance with the Code, we seek to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.

Specifically, GCT sets out the following policies:

Employment

GCT is committed to upholding the human rights of workers, and to treat them with dignity and respect. This includes seeking compliance with the following EICC standards:

- Ensuring that employment is freely chosen.
- The avoidance of all child labour.
- Limited working hours.
- Compliance with applicable wage laws and regulations.
- Humane treatment of all employees.
- Non-discriminatory recruitment and working practices.
- Freedom of association for all employees.

Health and Safety

GCT recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. GCT also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. To this end GCT seeks to comply with the EICC health & safety standards on the following topics:

- Occupational Safety.
- Emergency Preparedness.
- Occupational Injury & Illness.
- Industrial Hygiene.
- Physically Demanding Work.
- Machine Safeguarding.
- Sanitation, Food & Housing.

Environmental

GCT recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. To this end GCT seek to comply with the EICC environmental standards on the following topics:

- Environmental Permits and Reporting.
- Pollution Prevention and Resource Reduction.
- Hazardous Substances (including RoHS and REACH).
- Wastewater & Solid Waste.
- Air Emissions.
- Product Content Restrictions.



Business Ethics

To meet social responsibilities and to achieve success in the marketplace, GCT and our agents are to uphold the highest standards of ethics including:

- Business Integrity, including zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.
- No Improper Advantage.
- Disclosure of Information (in accordance with applicable regulations and industry practices).
- Intellectual Property Rights are to be respected.
- Fair Business, Advertising and Competition.
- Protection of Identity.
- Responsible Sourcing of Minerals (see below).
- Privacy - commitment to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees.
- Non-Retaliation – GCT has a communicated process for personnel to be able to raise any concerns without fear of retaliation.

With regard to the **Responsible Sourcing of Minerals**, GCT have the following stated policy:

GCT recognizes that any mineral export from conflict affected and high risk areas may result in human rights issues and that it has a responsibility to neither aid nor abet any organization that may contribute to these issues.

GCT is committed to supporting any policy that restricts and/or eliminates such conflict such as the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502.

GCT commits to incorporate into relevant supplier contracts and agreements the requirement for responsible sourcing of minerals and will suspend or discontinue engagement with suppliers where GCT identifies that these requirements are not being met.

In order to achieve these goals, GCT's supply chain will only be authorized to use smelters/refiners who are compliant with the EICC/GeSI Conflict-Free Smelter Program. GCT will monitor its supply chain with regard to its smelters/refiners and will require smelters/refiners to participate in the EICC/GeSI Conflict-Free Smelter Program until such time as smelters/refiners are audited and published as compliant.

Quality (Management System) (QMS)

GCT Ltd is committed to achieving the highest achievable standards of quality in the provision of products and services to our customers.

GCT Ltd is committed to complying with all standards and requirements applicable to our products and services.

GCT Ltd is committed to the establishment, implementation, operation and maintenance of a properly documented quality management system, appropriately designed for GCT's business activities, in compliance with ISO 9001:2015.

GCT Ltd is committed to the definition, measurement and review of objectives at all levels of the business and for all critical activities, and for the outputs of these reviews to act as a driver for the continual improvement of both GCT's business and for the quality management system.

GCT Ltd is committed to ensuring that the quality management system and the methods, processes and objectives which it contains are communicated and understood throughout the business.

Additionally adherence to the **EICC Code of Conduct** shall be assured within the scope of GCT's QMS:

GCT will implement a process to identify the environmental, health and safety and labour practice and ethics risks associated with our operations.

GCT will also determine the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

GCT will implement a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.