

Directors' Commitment to the Prevention of Fraud Across the Focusrite Group

Introduction

The Economic Crime and Corporate Transparency Act (ECCTA) is a UK law designed to combat economic crime and enhance corporate transparency. Under the ECCTA there is a new corporate offence, "failure to prevent fraud". The failure to prevent fraud obligation applies to large organisations such as the Focusrite Group. Under this offence, a company can be held criminally liable if an employee, agent, subsidiary or other associated person commits fraud intending to benefit the organisation and the organisation did not have reasonable fraud prevention procedures in place.

The ECCTA also aims to drive a cultural shift towards improved fraud prevention within organisations. The Board of Directors recognises its responsibility to set a strong ethical example and cultivate a culture of honesty and integrity that permeates all levels of the Focusrite Group.

The purpose of this statement is to set out the Focusrite plc's board of directors' (Board) commitment to preventing fraud that benefits the Focusrite Group.

Definition

For the purposes of this statement, fraud is not narrowly defined but encompasses a range of dishonest behaviours aiming to achieve a gain or cause a loss. As dishonesty is at the heart of fraud, attempted fraud is treated as seriously as accomplished fraud. Fraud may occur internally or externally and may be perpetrated by people in collusion with others.

Statement

The Board is committed to maintaining an anti-fraud culture across the Group so that all employees are aware of the risk of fraud, of what constitutes a fraudulent act and the procedures for reporting it. The Focusrite Group adopts a zero-tolerance approach to fraud and will take immediate action where a risk or suspicion of fraud arises.

As we said in our Code of Conduct, we want everyone to know that they can trust the Focusrite Group to do the right thing. Every time. Part of that ethos is that we require all of our employees, customers and business partners to act, at all times, with honesty and integrity and to take appropriate steps to safeguard resources.

People who work in the Focusrite Group are honest and professional but nevertheless, fraud is an ever-present threat and therefore must be a concern for all. Employees who have a suspicion of fraud should Speak Up using the Focusrite Group's Speaking Up hotline. It is the Focusrite Group's policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions of fraud. Employees should refer to the Speaking Up Policy for further guidance on the

protection afforded to anyone who suffers retaliation as a result of Speaking Up. External parties who have a suspicion of fraud should contact the Group at info@focusrite.com.

Where fraud involving an employee is proven, disciplinary action will be instigated and may result in summary dismissal.

In our efforts to deter the commissioning of fraud, we, the Board, will review and ensure that appropriate fraud prevention and detection measures are implemented through the use of risk assessments, review of control systems and promoting transparency and accountability. We have implemented a range of policies and procedures that are designed to ensure probity, business integrity and minimise the likelihood and impact of the incidents of fraud arising.

This statement has been approved by the Board on 29 August 2025 and will be reviewed at least annually.

A handwritten signature in red ink, consisting of a large, stylized 'P' followed by a series of loops and a long horizontal stroke.

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Chairman