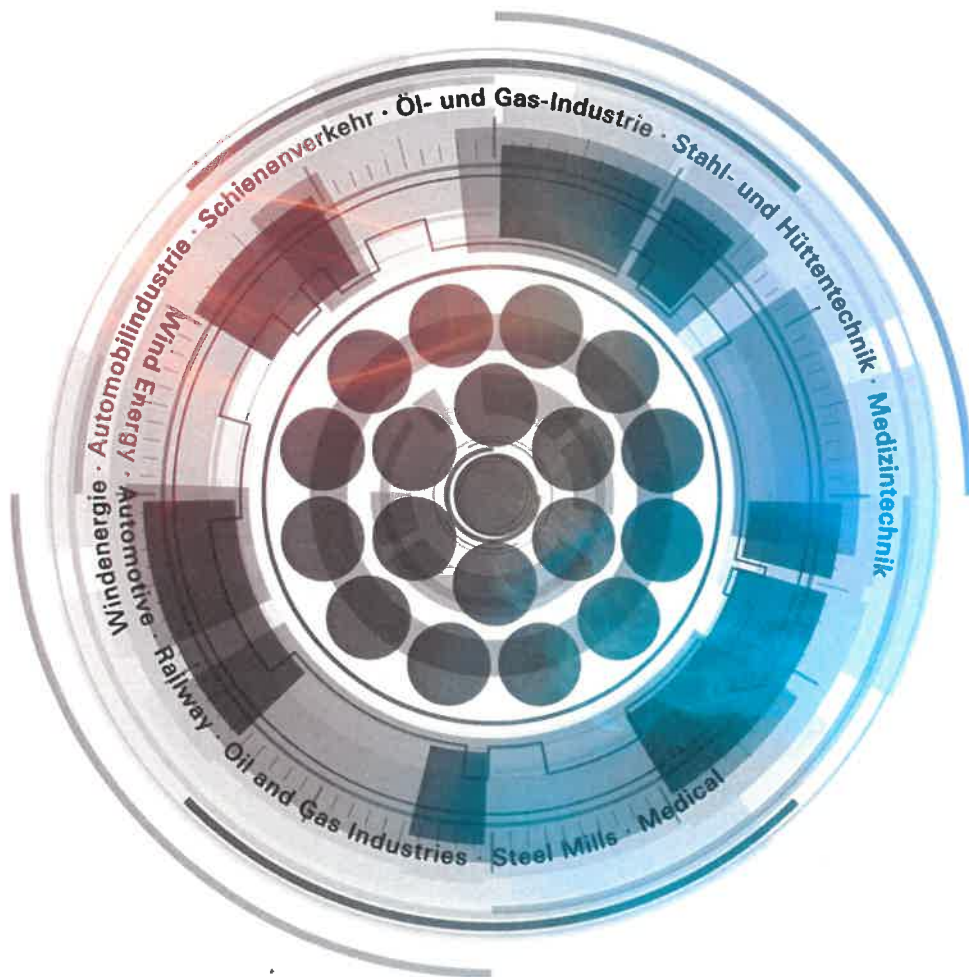


# Code of Conduct

HEW-KABEL Group



*Trust. Transparency. Cooperation.*

## **INTRODUCTION:**

The excellent reputation of our group as a supplier of high-quality products and services in the special cables sector is our key competitive advantage. The crucial basis for the trust of our customers, suppliers and the public placed in our group is our respect for and compliance with laws and regulations as well as internal company rules. Every employee must act and conduct themselves appropriately for this to happen.

The code of conduct formulates general requirements that are intended to provide standards and guidance for day-to-day work and thus contributes to strengthening our company's reputation. The code of conduct applies worldwide to all employees of the HEW-KABEL Group. Where the legal systems in the specific countries contain stricter provisions, these must also be observed by the respective companies and their employees in the countries concerned.

## 1. COMPLIANCE WITH RELEVANT LAWS AND REGULATIONS

The HEW-KABEL Group considers integrity of its employees to be an essential prerequisite for its continuing business success. For us, compliance with applicable laws and regulations is a top priority,

and we, therefore, expect every employee of the HEW-KABEL Group to act in accordance with these laws and regulations. Non-compliance may lead, not only to criminal or civil prosecution for individuals, but also to sanctions taken against our group. If employees violate the law or fail to comply with our internal guidelines, they will face disciplinary action.

## 2. COOPERATION WITH CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS

### 2.1 Counterfeit, Fraudulent, and Suspect Items

We are committed to ensuring the authenticity and integrity of our products, incoming goods and articles. To this end, we continuously monitor for counterfeits, plagiarism and fraudulent trade practices. In the event that any suspicions arise, we take immediate and proactive action to stop the circulation of such goods or services. Furthermore, we require our suppliers to implement countermeasures, processes, and actions to address any potential occurrences of this nature.

### 2.2 Fair competition

We are committed to fairness and integrity when competing for market share. The HEW-KABEL Group will not accept any order or contract that can only be secured by violating laws and regulations intended to ensure fair competition. In particular, agreements with competitors regarding prices, conditions, division of territory and customers are prohibited. Where the HEW-KABEL Group has a dominant position, in particular, with respect to purchasing, it may not abuse its dominant position.

### 2.3 Preventing corruption

#### Offering and granting advantages

When competing for our customers' business, we are conscious of the high quality of our products and services and our company's reputation. Using corrupt practices to secure orders or contracts is strictly prohibited. No employee may grant undue advantages to others in conjunction with initiating, concluding or processing orders or contracts, for example in the form of cash or non-cash benefits. The same applies to dealing with authorities.

Hospitality and promotional gifts are permitted as long as they reflect social customs and etiquette in the respective country. The choice and monetary value of the gift or invitation, as well as the circumstances in which they are given, must be in line with common - and legally acceptable - practice in the respective country. Money gifts are always prohibited. Whenever selecting or making decisions regarding gifts and invitations, it must always be ensured that their monetary value will not create the impression that they are intended to influence the recipient's business decisions. Transparency must also be maintained in connection with all gifts and invitations. Extremely high standards must be observed when selecting or making decisions regarding gifts and invitations extended to officials.

In all other respects, please refer to the most recent version of the working regulations of the respective company of the HEW-KABEL Group.

#### Requesting or accepting advantages

Our employees are not permitted to request or accept personal advantages. Hospitality and promotional gifts of lower value may be accepted as long as they are in line with common – and legally acceptable – practice and provided that they will not create the impression that they are intended to influence the business decisions of our employees. In cases of doubt, employees are obliged to obtain the approval of their line manager before accepting the advantage.

#### **2.4 Protection of trade secrets and intellectual property**

In order to maintain and consolidate our technological leadership, we need to continue developing our products and processes. This includes protecting our technology through patents and other industrial property rights. We expect an unconditional commitment the protecting our intellectual property from all our employees. In particular, every employee is responsible for ensuring that information relating to our intellectual property is not disclosed to third parties. Similarly, we also respect the intellectual property rights of others just as we expect others to respect ours.

Business and trade secrets must be treated in the strictest confidence; they may only be disclosed to employees as part of the performance of their duties.

#### **2.5 Avoidance of conflicts of interest**

An employee's personal interests and the interests of the company must be kept separate. Employees may only engage individuals or companies that are in a business relationship with the HEW-KABEL Group for their own private purposes if they agree on market-based terms and conditions. Paid secondary or part-time activities outside the company are generally prohibited, but may be allowed with the express prior consent of the relevant HR department. If employees feel they have conflicts of interest, they shall inform their line manager to find a solution.

#### **2.6 Data protection**

With the ever-increasing presence of communication technology in our everyday lives, properly handling of personal data (information concerning the personal or material circumstances of an identified or identifiable natural person) has become extremely important. This is why employees are required to comply with all relevant laws and company regulations with regards to the personal data of employees as well as third parties. Personal data of natural persons may only be collected, processed and used in accordance with regulatory and operational provisions. All parties are required to comply with the provisions of the EU General Data Protection Regulation (GDPR). In cases of doubt, employees shall consult the responsible data protection officer or an in-house data protection expert.

### **3. TREATMENT OF EMPLOYEES**

#### **3.1 General principles**

The HEW-KABEL Group is responsible for all its employees. We respect the personality of each individual. Outstanding performance of our employees is vital to our business success. The HEW-KABEL Group will promote talented employees who make a particular contribution to the long-term success of the group with their professional and social expertise. Our principles are based on the processes and guidelines of the United Nations (UN Charter) and the World Health Organization (WHO).

#### **3.2 Fair working conditions**

The HEW-KABEL Group recognises its employees' entitlement to adequate remuneration and observes the legally guaranteed minimum wage in the respective labour markets.

### **3.3 Prohibition of discrimination**

We do not tolerate any form of discrimination in our group. All employees shall be treated equally by their line managers and colleagues, regardless of ethnicity, colour, gender, religion, national and social origin, personal circumstances, health or age. Every employee shall be given the same opportunities. Recruitment, remuneration, terms and conditions of employment and access to training and promotions shall be solely based on the respective job requirements.

### **3.4 Rejection of forced and child labour**

The HEW-KABEL Group rejects any form of forced labour or child labour within the group. The HEW-KABEL Group expects its suppliers to refrain from forced and child labour in their companies and to exercise zero tolerance in this regard, in particular, by not sourcing materials from supply chains which are linked to forced or child labour. Suppliers are required to take appropriate measures to ensure that their own suppliers also operate in accordance with these principles.

## **4. ENVIRONMENT, HEALTH AND SAFETY**

### **4.1 Acting sustainably**

All employees of the HEW-KABEL Group are required to comply with all applicable environmental laws and regulations and make every effort to reduce the negative impact on the environment by conserving natural resources, reducing energy consumption and other measures.

### **4.2 Safe working environment**

In addition, all employees are required to comply with the applicable occupational health and safety laws and regulations. They are required to create and maintain a safe and healthy working environment.

## **5. PROTECTION OF COMPANY PROPERTY**

Company property may only be used for business purposes. All employees are required to ensure that any company property entrusted to them is treated properly and protected from loss, damage and theft.

## **6. COMPLIANCE WITH CODE OF CONDUCT**

Every employee of the HEW-KABEL Group shall receive a copy of this code of conduct. The principles and rules of conduct set out in the code of conduct shall reflect the reality of everyday working life within the company.

It is the responsibility of every manager in the company to ensure that all employees, including the managers themselves, are familiar with this code of conduct and comply with its provisions. The managers from the relevant companies or the HR department are available to answer any questions about this code of conduct. Every employee is entitled and obliged to report any violations that come to their attention to their line manager and/or the HR department.

Every reported violation shall be recorded and forwarded to the compliance commission consisting of employer and employee representatives in equal numbers. The commission will assess the submitted violations and develop joint measures to ensure that similar violations can be punished in the same way.

Wipperfurth, July 01, 2023

  
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