Code of Conduct and Ethical Standards at TELE-FONIKA Kable S.A. and other Companies in the TFKable Group

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TELE-FONIKA Kable S.A., 32-400 Myślenice, ul. Hipolita Cegielskiego 1, entered into the Register of Companies kept by the District Court for Kraków-Śródmieście in Kraków, XII Commercial Division of the National Court Register under No. KRS: 0000491666. REGON: 270543582, NIP: 626-000-43-86, Share Capital: 759 000 000 PLN (paid in full).

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TELE-FONIKA Kable S.A., as one of the global leaders in the cable and wire manufacturing industry, is a recognised and trusted supplier of products to companies worldwide in various sectors, including telecommunications, energy, electronics, shipbuilding and mining.
Furthermore, TELE-FONIKA Kable S.A. holds shares in foreign companies engaged in manufacturing (production facility in Serbia) and trade (companies in the United Kingdom, Germany, the United States and Lithuania). These companies, along with TELE-FONIKA Kable S.A., constitute the TFKable Group, and each of these companies and TELE-FONIKA Kable S.A. are also referred to hereinafter separately as the „Company" and collectively as the „Companies".
This Code sets out the steps taken by TELE-FONIKA Kable S.A. and the other Companies in the TFKable Group to ensure that the Companies' activities comply with the regulations governing their conduct and the adopted ethical standards.

Introduction

TELE-FONIKA Kable S.A., together with the other Companies in the TFKable Group, recognises the need to create an environment based on strong values that define its organisational culture. **Reliability, honesty, responsibility and passion** are the cornerstones of the Company's business, shaping its decisions, stakeholder relations, teamwork and the way to approach challenges.

Reliability:
For the Company, reliability means being transparent and conscientious in the conduct of business. It is crucial that the Company complies with applicable regulations and follows transparent business practices, which builds trust and maintains a positive image of the Company. Reliability also means being reliable in keeping commitments to Business Partners and employees.

Integrity:
Integrity is the foundation of trust on which the Company builds relationships with employees, Business Partners and the community. The Company operates to the highest ethical standards, adhering to moral principles and fair business practices.

Responsibility:
In the conduct of the Company's business, responsibility means consciously making decisions and taking action, taking into account the social, environmental and economic consequences. The Company cares about the well-being of employees, customers and local communities. It engages in sustainable development practices, striving to minimize its negative impact on the environment and taking actions that benefit not only the organisation but also society as a whole.

Passion:
The Company's business is driven by a passion to create innovative solutions and continuous improvement. It is committed to fostering an inspiring environment, supporting the personal and professional development of every member of the team. The Company believes that these values are key to achieving success in a way that is sustainable and in line with its long-term goals.

This **Code of Conduct and Ethical Standards** constitutes a set of principles and norms applicable in TELE-FONIKA Kable S.A. and other Companies of the TFKable Group. It is an integral part of the organisational culture. Its purpose is to promote honesty, respect and ethical conduct, thereby creating a work environment based on values and mutual trust. The Code applies to:

- All Employees of TFKable Group Companies understood as:
  - any person employed under a contract of employment, irrespective of the type of such contract (including temporary employment contracts) or the duration of the contract (both fixed-term and open-ended), as well as
  - any person performing activities on a basis other than an

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employment contract (including on the basis of a contract of work, commission, agency, including in the framework of his/her individual business activity, e.g. B2B partners),
  - members of the governing bodies of the Companies and individuals representing the Companies.
- Business Partners, in particular:
  - contractors and subcontractors, including their personnel who cooperate in accordance with applicable law (e.g. in the context of staff outsourcing),
  - suppliers, contractors, financial institutions and similar organisations to which the Companies belong,
  - persons acting on behalf of the Business Partners involved in the Companies (e.g. advisors to the Business Partners).

By entering into a relationship with a TFKable Group Company, either as an employee or as a Business Partner, each person undertakes to comply with this Code. The Companies prefer to work with suppliers who share their values and comply with the law and ethical standards both within their organisations and throughout the supply chain.

Principles of conduct and accepted ethical standards

1. Business ethics

At TFKable Group Companies, high ethical standards serve as the cornerstone of the business. The Companies are dedicated to combating corrupt practices through the implementation of clear procedures designed to eliminate the possibility of utilizing illegal means in the pursuit of business objectives. The principles of fair competition are upheld, ensuring that all business activities are founded on transparent and honest practices. Gaining a competitive advantage is approached with respect for laws, rules, and customs. Moreover, responsible information management is practiced, with a focus on maintaining the confidentiality and integrity of the Companies' data, employees, and Business Partners.

1.1 **Corrupt practices** are unethical actions aimed at gaining an unfair advantage, influence or benefit through illegal or unfair means. Corrupt practices may include, but are not limited to:

1.1.1 **Bribery**, defined as obtaining an advantage in order to gain an unfair advantage, is strictly forbidden. All employees of TFKable Group Companies are required to comply with this prohibition and should not participate in any capacity in such acts or violate the principles of integrity. Individuals contravening these prohibitions are subject to severe consequences, including disciplinary sanctions, termination of their contract and reporting of the incident to the appropriate law enforcement authorities.

1.1.2 **Conflict of interest** exists when personal interests conflict with duties to a TFKable Group Company, which may affect the ability to make objective decisions in the interests of the TFKable Group.

Potential or existing conflicts of interest must be clearly disclosed and reported. Employees are required to avoid decisions that may compromise the interests of the TFKable Group for personal gain.

All employees must be aware of and adhere to the rules of conduct in the event of an occurrence or possibility of a conflict of interest, including, but not limited to, that the employee involved, whenever a conflict of interest occurs or could occur, should conduct an analysis of the situation and consult his/her supervisor, or the Human Resources department or the Compliance Officer. The cooperation of the employee involved with the Human Resources department or the Compliance Officer is necessary in order to

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determine and implement an appropriate course of action.
The principles adopted for dealing with situations classified as conflicts of interest are aimed at minimising the impact on the TFKable Group Companies, including in particular such possible solutions as: transferring the designated duties of the employee involved to another employee not involved in the conflict or resignation from the designated tasks of the employee involved.
Breaches of the rules for dealing with conflicts of interest or situations where a conflict of interest is likely to arise may result in disciplinary action, including permissible disciplinary penalties or even termination of the contract depending on the scale of the breach.

1.1.3 **Money laundering** is the concealment of the origin of illicit funds by introducing them into the legitimate financial circuit in order to disguise their true source.
Employees are required to identify situations where money laundering is suspected, especially in transactions involving large amounts or unusual movements of cash.
Any suspicions must be reported immediately to the internal services and, if the applicable law so provides, to law enforcement authorities.
TFKable Group Companies are committed to fully cooperate with law enforcement authorities in money laundering investigations, providing access to information and cooperation with legal procedures.
In the case of reasonable suspicion of money laundering, the TFKable Group Company will conduct a thorough analysis of the transactions in cooperation with experts and relevant institutions, and suspicious transactions will be stopped immediately.

1.1.4 **Fraud** is an action intended to mislead, deceive or defraud by means of, for example, deception, falsification of information or dishonest representation of facts.
The Companies unconditionally prohibit any form of fraud, including falsification of documents, information, manipulation of financial data or any other similar act to the detriment of the TFKable Group Companies, other persons and entities.
In the event of confirmation or reasonable suspicion of fraud, the TFKable Group Company will take action, including investigations to determine and clarify the circumstances, causes and effects of the incident and furthermore determine and implement corrective measures.
Those responsible for fraud, including the perpetrators but also those who facilitated, enabled or encouraged the fraud will be subject to disciplinary sanctions, including permissible disciplinary sanctions or even termination of the contract depending on the scale of the breach.
Any suspicion of fraud will be reported immediately to the law enforcement authorities if the applicable law so provides.
TFKable Group Companies recognise that, in order to counter fraud, they implement policies of consistent ethical standards, clear procedures, education and effective monitoring and reporting mechanisms.

1.2 **Unfair competition** encompasses various practices that violate the rules of fair play in the market and can lead to damage to TFKable Group Companies, other companies and the market as a whole. Examples include bid rigging, price fixing between vendors, predatory pricing (dumping) and division of territory.

1.2.1 **Bid rigging** is an arrangement between competitors that manipulates the bidding process to gain an illegal advantage. At TFKable Group Companies, all forms of collusive bidding and activities that violate the principles of fair competition in purchasing and sales processes are prohibited.

1.2.2 **Price fixing** is a collaborative practice where competitors collectively establish product or service prices, contravening fair competition principles. TFKable Group Companies advocate for equitable price competition, emphasizing transparency and valuing the products and

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services offered. The Companies guarantee impartial pricing decisions, steering clear of price manipulation for illicit competitive advantage.

1.2.3 **Dumping (pricing)** is the deliberate lowering of prices below production costs in order to eliminate competition. TFKable Group Companies reject dumping pricing practices, advocating fair competition based on quality, innovation and fair commercial terms. The prices offered reflect the value of the benefits provided.

1.2.4 **Territory division** is a practice that restricts competition by fixing the areas served by competing companies. TFKable Group Companies believe in the openness of the market and avoid territory-sharing practices, promoting the development of competition and building relationships with customers and Business Partners. TFKable Group Companies do not participate in any territory-sharing arrangements that could restrict natural competition.

1.3 **Responsible information management**

1.3.1 **Protection of business secrets**

The Companies of the TFKable Group are obliged to maintain Company secrecy. Information constituting a corporate secret includes, among other things, business strategies, development plans, technologies, operating reports, customer data and other information which, in accordance with applicable law, constitutes legally protected information of one's own and others' in the possession of the Companies of the TFKable Group.

In order to respect confidentiality, the Company restricts access to protected information only to employees whose access is necessary for the performance of their duties. The Company uses appropriate physical and technical measures, such as monitoring, access controls and advanced IT security, to protect against unauthorised access, theft or loss of protected information

In agreements with Business Partners, including contractors and suppliers, the Company precisely defines the principles of TFKable Group's business secrets protection imposing on them the obligation to observe the security standards in force in the TFKable Group Companies.

1.3.2 **Protection of Personal Data (as defined by the EU GDPR).**

TFKable Group Companies adhere to relevant data protection laws, encompassing the EU General Data Protection Regulation (GDPR) and local national regulations. Personal data undergoes processing solely for purposes aligned with the initial collection intentions. Redundant information is neither collected nor processed, and any related actions are substantiated in compliance with data protection legislation.

The TFKable Group Companies have instituted appropriate technical and organisational measures to safeguard personal data against unauthorized access, loss, or unauthorized modification. These measures ensure the exercise of the rights of individuals entitled to such data.

2. Export control and turnover restrictions

2.1 **Export controls** comprise a system of activities, procedures and regulations designed to monitor, regulate and restrict the movement of goods, technology and information between countries. The main objective is to prevent the illicit transfer of goods of potential strategic importance, to ensure national security and to comply with international agreements, embargoes and trade sanctions.

The TFKable Group Companies and their employees are obligated to adhere to applicable export control regulations, encompassing restrictions and prohibitions on exporting specific goods, technology, or data. Business Partners of the TFKable Group Companies are also expected to comply with the aforementioned prohibitions and restrictions. Engagement in activities that involve the illicit transfer of information, goods, or technology to countries subject to embargoes or other sanctions is strictly prohibited.

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2.2 **Trade sanctions** are restrictions imposed on the economy of one or more countries by other countries or organisations of countries, most often in response to human rights violations, aggression against other countries or other actions contrary to the interests of the sanctioning nation or organisation. TFKable Group Companies, including their employees, are obliged to comply with all international and national trade sanctions imposed on specific countries, entities or sectors. It is forbidden to directly or indirectly support companies, entities or to continue activities that are subject to trade sanctions. The Company expects compliance with the sanctions described above from the Business Partners of the TFKable Group Companies.

2.3 **Conflict Minerals** such as tin, tantalum, tungsten, gold, cobalt and mica are sometimes mined in regions affected by armed conflict or other crises. Doing business in these areas carries the risk of funding organisations involved in illegal or unethical practices, for example forced labour, child labour, other forms of human rights violations, environmental destruction, corruption or money laundering.

TFKable Group Companies maintain a Responsible Minerals Sourcing Policy that involves implementing identification and elimination measures to exclude minerals listed as sourced from areas of armed conflict or other crises, where human rights, including children's rights, environmental destruction, or other illegal or unethical practices occur, from the entire supply chain. The Companies adhere to the obligations stipulated in EU Regulation 2017/821 applicable to EU-based entities and follow standards and guidelines for responsible mineral sourcing established by the OECD or other relevant organizations.

Compliance with the described obligations and standards is also expected from Business Partners of the TFKable Group Companies.

3. Environment, energy, climate change

In concern about the environment, sustainable development, and addressing climate change, the TFKable Group Companies aim to minimize their adverse impact on the environment.

3.1 **Sustainable development**

The Companies within the TFKable Group, including their employees, are obligated to engage in activities that support sustainable development, considering the balance between economic, social, and ecological aspects. Initiatives are undertaken to optimize production and service processes, aiming to reduce the environmental impact. Business Partners of the TFKable Group Companies are also expected to comply with these obligations and standards.

3.2 **Environmental protection**

The Companies of the TFKable Group, along with their employees, must adhere to all applicable regulations on environmental protection, encompassing waste management, chemical substances, and the preservation of biodiversity. Adopting a „zero waste" approach to natural resource consumption and utilizing environmentally friendly technologies are integral practices. Business Partners are similarly expected to uphold these obligations and standards.

3.3 **Energy efficiency**

TFKable Group Companies recognise the importance of continually enhancing energy efficiency. Activities include investing in modern technologies, monitoring energy consumption, incorporating renewable sources, and fostering awareness among employees and throughout the supply chain.

3.4 **Coping with climate change**

TFKable Group Companies actively work towards combating climate change. Initiatives focus on reducing greenhouse gas emissions and supporting adaptation to the effects of climate change. Informative meetings are conducted for employees and other participants in the value chain to raise awareness about environmental, energy, and climate change matters.

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4. Human welfare

TFKable Group Companies accord the utmost importance to upholding human rights within the framework of ethical and sustainable international business. There is a steadfast commitment to respect, protect, and support human rights across all facets of business operations. This commitment aligns with compliance with the UN International Bill of Human Rights, encompassing civil, political, economic, social, and cultural rights, alongside the principles of social justice and equality. Furthermore, adherence to the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Business Enterprises, and the UN Declaration on the Rights of Indigenous Peoples is integral to the Companies approach.

4.1 Human rights

TFKable Group Companies strongly denounce human rights violations, including human trafficking, modern slavery, forced labour and child labour. There is a steadfast commitment to upholding the dignity of every individual and opposing all forms of exploitation. Collaboration with Business Partners involved in forced labour, slave labour, child labour, or failing to ensure safe workplace conditions is strictly avoided. Ethical standards regarding human rights are expected to be adhered to by Business Partners. The Group is resolute in eliminating forced labour within its supply chain and undertakes educational initiatives to heighten awareness among employees and Business Partners regarding human rights issues.

4.2 Employee rights

TFKable Group Companies are dedicated to ensuring safe and healthy working conditions in alignment with health and safety regulations. The protection of the work environment is prioritized, and the necessary training, equipment, and procedures are provided to minimize the risk of accidents.

The commitment extends to guaranteeing fair, dignified, and equitable working conditions, encompassing fair remuneration, opportunities for upskilling, and a balance between work and personal life. Open communication between employees and management is promoted, granting employees the right to express their opinions and ideas.

Positive employee relations are fostered, emphasizing respect, cooperation, and fairness. Trade unions, as representatives of employee interests, are recognised as essential partners. The TFKable Group, as an employer, is receptive to engaging in dialogue with trade unions and acknowledges their statutory rights to co-determination on key issues affecting the business.

TFKable Group Companies maintain a zero-tolerance policy for any form of discrimination, advocating for equality based on gender, race, colour, ethnicity, religion, sexual orientation, or disability. Training initiatives are implemented, and support is extended for the professional development of employees, with a commitment to eradicating all forms of discrimination.

Regular monitoring and assessment of working conditions are conducted, incorporating the feedback of employees. Corrective actions are implemented, enhancing practices based on their evaluations. Adherence to and enforcement of relevant laws governing working conditions, health and safety, two-way communication, employee relations and non-discrimination are ensured.

5. Application and enforcement of these regulations

This Code of Conduct and Ethical Standards sets out the duties, principles and standards of conduct that are governed in the first instance by the provisions of the applicable law and the Code remains consistent with them. Violations of the Code will result in legal and disciplinary consequences for those responsible for them

A mechanism for internal whistleblowing and whistleblower protection has been established and the following communication and complaint channels have been made available to stakeholders.

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- TFKCompliance phone line: **+48 12 652 52 52**
- email address: **compliance@tfkable.com**
- contact form on the website: **https://www.tfkable.com/compliance.html**
- directly or via post to the TFKCompliance team (address: **TELE-FONIKA Kable S.A., H. Cegielskiego 1, 32-410 Myślenice**, with the note „**TFKCompliance**".

All reports are treated with the utmost confidentiality. Each is investigated and explained and, where necessary, the Company takes corrective action.

The Management Board of TELE-FONIKA Kable S.A. and the executive bodies of the other Companies has approved and ensures that the Code of Conduct and Ethical Standards is communicated, understood, and implemented, and is also accessible to interested parties.

Date of issue: Myślenice, 01.03.2024

The Management Board of TELE-FONIKA Kable S.A.

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