

Information Policy

TELE-FONIKA Kable S.A.

and other Companies within

TFKable Group

This Policy defines the principles of information dissemination and communication with TELE-FONIKA Kable S.A. and other Companies within the TFKable Group's business, financial and social partners.

TFKable Group pursues a transparent Information Policy, utilizing both traditional methods and modern technologies that ensure the transparency of information exchange, maintenance of high standards of security, substantive quality, tailored presentation of conveyed content in a customized manner that aligns with the expectations and informational needs of partners.

The term "TFKable Group," for the purposes of this Policy, refers to TELE-FONIKA Kable S.A. and the capital companies in which it holds shares, including companies engaged in manufacturing or trading activities in the United Kingdom (CCC Ltd), Germany (TF Kable Tele-Fonika Kable Central Europe GmbH), Serbia (TF Kable Fabrika Kablova Zajecar d.o.o.), the United States (Tele-Fonika Cable Americas Corp.), and Lithuania (UAB Baltic). On the other hand, the term "Companies" refers to each individual company and all the companies together within the TFKable Group.

1. Objective of this Information Policy

1. TFKable Group endeavours to increase the effectiveness of information through ensuring high communication standards, which express respect for principles such as transparency, reliability, credibility, validity and coherence.
2. Information is provided in accordance with the rules that the Companies are obligated to follow through national and international regulations, contractual provisions, adopted standards, and decisions of the Company's bodies. These efforts aim to strengthen and build positive relationships with external partners based on trust.
3. Through the principles of the information policy, the TFKable Group emphasizes and expresses the obligation to maintain the confidentiality of the Companies' trade secrets, ensuring the protection of confidential information and personal data. This includes defining mechanisms for supervising the storage and processing of confidential information and personal data in accordance with national regulations and internal regulations arising from them concerning the processing of confidential information or personal data, including sensitive data.

2. Organisation of this Information Policy

1. The principles of the information policy are determined by the management of TELE-FONIKA Kable S.A. through a resolution, and the executive bodies of other Companies adopt these principles for implementation in their respective Companies.
2. Companies conduct periodic verification of the compliance of the information policy with the provisions of the applicable law, recommendations of the supervisory authority, and other relevant regulations.
3. The Management Board of TELE-FONIKA Kable S.A. determines the directions of external communication, including media contacts, and the executive bodies of other companies adopt these guidelines for application in their respective companies.
4. The Advisor for Relations at TELE-FONIKA Kable S.A. together with the Marketing Director at TELE-FONIKA Kable S.A. is responsible for providing responses to the media regarding matters related to the TFKable Group or its companies.

3. Recipients of this Information Policy

1. This Information Policy is particularly addressed to the following business, financial and social partners of TFKable Group:

- 1.1 Customers - current and future;
- 1.2 Suppliers - current and future;
- 1.3 Business partners;
- 1.4 Banks and other financial institutions;
- 1.5 Authorities and institutions to which TFKable Group is obligated to report specific information;
- 1.6 Other stakeholders of TFKable Group.

2. Due to the structure of the shareholder base, obligations to inform shareholders are carried out directly, in accordance with the provisions of the Commercial Companies Code, in the manner established by the statute, the management regulations and the supervisory board regulations.

4. Forms of Information Dissemination

1. TFKable Group utilises the following communication channels:

- 1.1 Corporate website in selected languages – www.tfkable.com;

1.2 Email;

1.3 Postal correspondence;

1.4 SMS messages;

1.5 Direct contacts and meetings of the individuals employed within the Companies;

1.6 Social media;

1.7 Product marketing materials, particularly product catalogues, brochures, leaflets;

1.8 Product presentations, particularly direct presentations during industry meetings;

1.9 Presentations for stakeholders, particularly financial institutions, suppliers and economic intelligence agencies.

2. TFKable Group communicates with partners and stakeholders using the most optimal form of contact, considering the time of information delivery, its scope and the specificity of the conveyed data.

5. Scope of Information Dissemination

1. A properly implemented Information Policy involves the obligation to inform shareholders and customers of TFKable Group about events that directly or indirectly impact TFKable Group's current activities.

2. Information specified in this Policy may not be published

if its disclosure would adversely affect the position of the TFKable Group within the meaning of competition and consumer protection regulations or would violate legally protected secrets, agreements, or unilateral commitments.

3. While implementing actions within the Information Policy, TFKable Group also adheres to ethical principles, universally applicable laws and internal procedures that set standards for interacting with partners and other stakeholders of TFKable Group.

4. Communication with partners is based on facilitating access to information and conveying it in a clear, reliable and adequate manner, including product offerings, as well as facilitating partner access to after-sales service.

5. TFKable Group ensures equal access to information, including the principles of receiving and processing complaints, for all partners while complying with legal provisions and contractual or unilateral obligations.

6. TFKable Group follows the Complaint Handling Procedure, which establishes the principles for accepting and considering complaints. All reports are subject to detailed analysis and the conclusions drawn from it are used to improve existing processes and increase the quality of after-sales service.

6. Manner of Information Dissemination

1. Information indicated in this Information Policy is made available on the website www.tfkable.com.
2. Data to which TFKable Group is obligated to disclose is published within the deadlines specified by universally applicable laws.
3. Information about significant events affecting TFKable Group's position is publicly announced and communicated to partners in Polish or English, in accordance with universally applicable laws.
4. Only the Management Board of TELE-FONIKA Kable S.A. is authorized to decide on providing confidential information to a third party. In such cases, information is transmitted based on separate confidentiality agreements or non-disclosure clauses (NDA), specifying data archiving procedures and maintaining the highest security standards.

7. Communication Security Principles

1. Ensuring the security of stored and transmitted information in TFKable Group involves:
 - 1.1 Information confidentiality – preventing third-party

access to data;

- 1.2 Information integrity – avoiding unauthorized changes to data;
- 1.3 Information availability – guaranteeing access to data in accordance with national and international regulations and internal procedures;
- 1.4 Information archiving – maintaining a complete history in accordance with national and international regulations and internal procedures.

2. The Management Board of TELE-FONIKA Kable S.A. employs measures appropriate to the situation to ensure information security within the TFKable Group. Decisions of the management of TELE-FONIKA Kable S.A. are implemented by the executive bodies of other Companies.
3. The following data within TFKable Group is subject to special protection (confidential information):

- 3.1 Information about contracts – both planned, current and historical;
- 3.2 Financial information of TFKable Group;
- 3.3 Organizational information of TFKable Group;
- 3.4 Access data to TFKable Group IT systems;
- 3.5 Personal data;
- 3.6 Information that provides TFKable Group with a competitive advantage;

- 3.7 Others marked as 'confidential information' or 'confidential data';
- 3.8 information of economic value, for which the Company has taken actions to keep them confidential, regardless of whether they have been marked under point 3.7 or not.
4. Every employee in the TFKable Group is obligated to maintain the confidentiality of confidential information to which they have been granted access.

The Management Board of TELE-FONIKA Kable S.A. has approved and ensures that the Information Policy is communicated, understood, and implemented, and is also accessible to interested parties.

Release date: Myślenice, 01/03/2024.

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