

Modern Slavery and Human Trafficking Policy

TELE-FONIKA Kable S.A.

TELE-FONIKA Kable S.A., as one of the global leaders in the cable and wire manufacturing industry, is a recognized and trusted supplier of products to companies worldwide in various sectors, including telecommunications, energy, electronics, shipbuilding and mining.

This Policy outlines the steps taken by TELE-FONIKA Kable S.A. (hereinafter referred to as the Company or TFKable Group) to ensure the Company's compliance with applicable regulations regarding the prevention of modern slavery and human trafficking.

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.

1. Organizational structure and supply chain

The Company's main headquarters are located in Myślenice. The Company conduct production activities in two facilities in Poland: Bydgoszcz, Kraków, Myślenice and Bukowno. The facility in Krakow is located in two separate locations, namely Krakow Wielicka and Krakow Bieżanów. Additionally, within the

TFKable Group, there is a production facility in Serbia and four trading companies operating in the United Kingdom, Germany, the United States and Lithuania.

TELE-FONIKA Kable S.A. adheres to universally applicable national and international laws, social norms and does not engage in any activities that resemble slavery or human trafficking.

The Company will not support entities knowingly involved in slavery and human trafficking or conduct transactions with them. According to the **TELE-FONIKA Kable S.A. Supplier Code**, material and service suppliers are required to demonstrate compliance with this policy upon request. Furthermore, they periodically affirm that their operations adhere to the requirements for combating slavery and human trafficking. Suppliers are obligated to complete a **Supplier Self-Assessment Form** and confirm information related to, among other things, preventing slavery and human trafficking.

2. Documents and internal regulations of TELE-FONIKA Kable S.A. related to preventing slavery and human trafficking

- **Work Regulations** - the main internal document in the field of labor law, specifying the organization and order in

the work process and related rights and obligations of the employer and employees. Its provisions indicate and confirm the basic rights of workers, including voluntariness of the employment relationship and the freedom of workers to associate, as arising from the Constitution and the Labor Code. Any change to its provisions is subject to agreement with employee representatives;

- **Payroll Regulations** - another important internal document in the field of Labor Code, which specifies the conditions for remunerating employees and other benefits related to work. Its provisions unambiguously prohibit unpaid work and guarantee the retention of the statutory minimum wage;
- **Internal Violations Reporting and Protection of Whistleblowers Regulations** - enable every employee to report internal irregularities within the Company while providing protection to whistleblowers against retaliatory actions and adverse treatment;
- **TELE-FONIKA Kable S.A. Supplier Code** - prohibits its suppliers from using any form of child labor, forced labor, human trafficking or modern slavery. Simultaneously, it reserves the right for the Company to monitor suppliers' actions in compliance with the code and conduct verification processes;
- **Human Rights and Diversity Protection Policy** - aims to

create and promote a work environment where all individuals adhere to human rights and are treated equally. Under this Policy, the Company unequivocally opposes any form of child labor, forced labor, human trafficking and modern slavery.

3. Due Diligence

As part of its efforts to recognize and mitigate the risks of slavery and human trafficking:

- the Company has introduced Internal Violations Reporting and Protection of Whistleblowers Regulations;
- the Company updates existing policies and develop new ones to mitigate potential risks associated with human rights violations and modern slavery;
- the Company ensures transparency and diligence in its recruitment processes. Employment contracts and other documents containing essential employee details are stored in their personal files, allowing verification by authorized personnel or relevant statutory bodies;
- periodically, the Company assesses the supply chain's compliance with the requirements for combating slavery and human trafficking.

4. Risk Assessment and Management

The Company continuously monitors the global geopolitical situation and other factors impacting supply chains. Events like the COVID-19 pandemic, warfare or acts of terror lead to rapid and unexpected supplier changes. Considering these and similar factors, the Company maintains heightened vigilance, evaluating potential threats in the area of slavery and human trafficking and taking immediate action when necessary.

To date, the Company has not identified any cases related to modern slavery or human trafficking in any area of its operations. Nevertheless, this fact does not diminish the Company's efforts to identify potential risks.

5. Future Actions

The Company intends to continue processes aimed at risk management and due diligence concerning the prevention of modern slavery and human trafficking. It will also increase awareness among its employees and partners in this area. The Company will refine operating procedures and documents such as the **TELE-FONIKA Kable S.A. Supplier Code** and the **Supplier Self-Assessment Form** to further assure itself and its stakeholders of full compliance regarding the prevention of

modern slavery and human trafficking.

This Policy has been approved by the Management Board of TELE-FONIKA Kable S.A. and includes the commitments of the Company to counter modern slavery and human trafficking.

Release date: Myślenice, 01/03/2024.

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