

Supplier Code of Conduct

TELE-FONIKA Kable S.A.

The Supplier Code of Conduct defines general ethical principles and sustainable development guidelines adopted by TELE-FONIKA Kable S.A. (hereinafter referred to as the "Company") applicable to Suppliers of goods and services, as well as their employees, collaborators (e.g., advisors, B2B partners), contractors, and subcontractors (collectively referred to as "Suppliers") during collaboration. The aim of these guidelines is to ensure that TELE-FONIKA Kable S.A. collaborates with Suppliers who share the appropriate approach to responsible business relationships, strive for sustainable development, and introduce solutions and values consistent with this Code. This constitutes a significant qualification and evaluation criterion for potential Suppliers.

1. Compliance with the Law

It is the obligation of every Supplier to TELE-FONIKA Kable S.A. to comply with the applicable legal regulations for the Supplier and the provisions of this document, as well as the principles outlined in the TFK Anti-Corruption Policy available at https://www.tfkable.com/download/files/upload/files/Anti-Corruption_Policy.pdf. In situations where the Supplier Code of Conduct sets requirements not regulated by absolutely binding legal regulations, Suppliers should adhere

to the provisions of this document.

Social responsibility is an important element of the operating strategy of TELE-FONIKA Kable S.A. and business activities are conducted while adhering to the highest ethical standards, based on a value system that emphasizes stability, integrity, responsibility and innovation.

2. Concern for the Natural Environment and Climate Change Mitigation

TELE-FONIKA Kable S.A., as one of the global leaders in the cable and wire manufacturing sector and a proven Supplier of cable systems to dedicated sectors such as telecommunications, energy, electronics, shipbuilding and mining, identifies and minimizes the impact of its activities on the natural environment and climate.

From its Suppliers, the Company expects adherence to the following principles:

- conducting of activities with respect for the environment and natural resources, in accordance with the regulations applicable in the countries where they operate;
- undertaking actions (in line with the Paris Agreement and the European Green Deal) to counteract the ongoing climate change by monitoring the carbon footprint (based on the

definitions of the Greenhouse Gas Protocol for Scope 1 and 2 emissions, and if possible, Scope 3 emissions as well, and planning actions aimed at minimizing it, <https://ghgprotocol.org/>).

- taking actions towards a circular economy, which includes minimizing water consumption, the use of depletable resources and reducing the types and quantities of generated waste (and methods of dealing with them) and seeking innovative solutions in this area;
- Suppliers of the specified raw materials should be aware that, in accordance with the adopted Policy of Responsible Mineral Sourcing, TELE-FONIKA Kable S.A. does not use raw materials in its products that are sourced from regions affected by armed conflicts or high-risk areas, due to the risk of financing organizations involved in illegal or unethical practices, such as forced labor, child labor and other forms of human rights violations, environmental destruction, corruption or money laundering;
- the Company adheres to the obligations imposed on entities based in the EU by EU Regulation 2017/821. It also complies with the standards and guidelines for responsible mineral sourcing defined by the OECD or other relevant organizations;
- the Company also expects compliance with the above-described obligations and standards from the business partners of the TFKable Group Companies.

3. Human Rights

Respecting human rights and diversity is of fundamental importance in the operations of TELE-FONIKA Kable S.A. The Company expects Suppliers to adhere to the following provisions:

- the Universal Declaration of Human Rights;
- the 10 principles of the UN Global Compact;
- UN guidelines on business and human rights;
- OECD guidelines for multinational enterprises.

This includes:

- providing a healthy and safe workplace in accordance with safety and health regulations, internal regulations and requirements, while making every effort to minimize accidents, injuries and health risks;
- operating within the legal framework concerning wages, working hours, overtime and other work-related benefits;
- respecting the workers' right to associate, including forming or joining trade unions;
- ensuring equal opportunities, especially in recruitment, training, skill development, performance evaluation, access to promotions and benefits and wage levels;
- incorporating the views of internal and external stakeholders

and engaging in dialogue with their representatives;

- respecting the rights of indigenous populations in areas where operations are conducted;
- establishing a mechanism for filing and addressing complaints from employees and stakeholders and refraining from retaliatory actions.

TELE-FONIKA Kable S.A. works against discrimination and other legally or ethically impermissible behaviors in the course of its business activities, particularly:

- any form of forced labor, human trafficking or modern slavery;
- child labor for those who have not reached the legal working age according to local laws and individuals under the age of 18 in positions involving hazardous work as per the International Labour Organization's convention;
- any form of discrimination or harassment based on age, gender, origin, skin color, religion, political views, health status, gender identity, sexual orientation, family or financial situation or other factors;
- any forms of bullying, harassment, exploitation, abuse and violence, as defined by the regulations of the country where the activity is conducted;
- conflicts of interest or corruption.

4. Verification

TELE-FONIKA Kable S.A. has the right to monitor the Supplier's compliance with the provisions of this Supplier Code of Conduct and conduct verification processes. The primary tools used to assess the Supplier's adherence to this Code include documents submitted by Suppliers, publicly available sources, and dedicated surveys or audits conducted by TELE-FONIKA Kable S.A. or an external audit firm with appropriate qualifications.

Each Supplier is required to cooperate with TELE-FONIKA Kable representatives in this scope, meaning they should provide the necessary information as part of the questionnaires or audits.

5. Consequences of Supplier Code of Conduct Violations

The Supplier is obligated to report any instances of violations of the provisions of this document and to effectively remedy them within the agreed-upon timeframe, without incurring costs for TELE-FONIKA Kable S.A.

Violation of the Supplier Code of Conduct may have a negative impact on the business relationship between the Supplier and TELE-FONIKA Kable S.A. Potential consequences

may include, among other things, contract termination or suspension of cooperation. The provisions of this Code regarding verification and audits do not exempt the Supplier from legal or contractual responsibilities, nor do they in any way limit them.

6. Responsible Supply Chain

Every Supplier associated with TELE-FONIKA Kable S.A. is expected to ensure adherence to the principles outlined in this document among their collaborators, contractors, subcontractors, and other Suppliers, while also verifying the supply chain's compliance with legal regulations and this Code.

7. Supplier Commitment

Every Supplier in collaboration with TELE-FONIKA Kable S.A. declares compliance with the documents specified in the Code, adhering to its principles. Any instances of irregularities identified in the supply chain should be reported to the Compliance Officer of TELE-FONIKA Kable S.A.:

- via the contact form available on the website: **<https://www.tfkable.com/compliance.html>**
- via phone to the TFKCompliance team: **+48 12 652 52 52;**

- via email to: **compliance@tfkable.com;**
- directly or via post to the TFKCompliance team (address: **TELE-FONIKA Kable, Hipolita Cegielskiego 1, 32-400 Myślenice**, with the note „TFKCompliance.”

The Management Board of TELE-FONIKA Kable S.A. has approved and ensures that the Supplier Code of Conduct is communicated, understandable, and applied, as well as available to interested parties.

Release date: Myślenice, 01/03/2024.

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