

## **Code of Conduct**

ExpressKabel GmbH is committed to ecological and socially responsible management. We expect the same from our suppliers. We also require our employees to follow the principles of ecological, social and ethical conduct integrated into our corporate culture. We strive to optimize the sustainability of our corporate activity and products [or services] and ask our suppliers to contribute holistically.

For future collaboration, contracting parties agree to the application of the following provisions for a joint code of conduct. This agreement serves as the basis of all future supplies. Contracting parties commit themselves to fulfil the code of conduct's principles and requirements. Suppliers are asked to commit their subcontractors to comply with the standards and provisions of this document contractually. This agreement becomes effective when signed. Violations of this code of conduct may provide reason and grounds for our company to terminate our business relationship, including any supply contracts.

This code of conduct is based on national laws and regulations as well as international agreements, such as the Universal Declaration of Human Rights of the United Nations, Children's Rights and Business Principles of UNICEF, the Guiding Principles on Business and Human Rights of the United Nations, the international labour standards of the International Labour Organisation and the Global Compact of the United Nations. We expect our suppliers to comply with all relevant laws, regulations and standards.

### **1. Social Responsibility**

#### **Exclusion of Forced Labour**

No forced labour, slave labour or similar labour may be used. Work must be performed voluntarily and employees must be able to terminate their employment or employment relationship at any time. There may also be no unacceptable treatment of workers, such as physical cruelty or sexual or personal harassment.

#### **Prohibition of Child Labour**

No phase of production may use child labour. Suppliers must follow the recommendation of the ILO Minimum Age Convention, according to which the minimum age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years.

#### **Fair Wages**

Wages paid to labourers must comply with all applicable laws concerning remuneration, such as laws on minimum wage and overtime. Should the minimum wage required by law not suffice to cover the cost of living, the business partner must pay wages that cover basic needs. Wage deductions as punishment are not permitted. The basis of remuneration must be disclosed to employers regularly on their pay slip.

### **Fair Working Hours**

Working hours must comply with applicable laws or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week. Employees must also receive at least one day off after 6 consecutive days of work. The number of hours worked per week may not regularly exceed 48.

### **Freedom of Association**

The supplier respects the right of labourers to association, join unions, contact employee representation and membership in works councils in compliance with local laws. Labourers must be able to communicate with management openly and without fear of repercussions or harassment.

### **Anti-Discrimination**

Any form of discrimination against employees is prohibited. This applies, e.g., to discrimination based on gender, race, caste, skin colour, disability, political opinions, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and rights of each individual must be respected.

### **Health Protection; Workplace Safety**

The supplier must ensure a safe and healthy work environment. Necessary precautions against accidents and health risks resulting from the work are taken by establishing and implementing appropriate work safety systems. Employees are regularly informed about and trained in health protection and security standards and measures. Employees receive proper access to drinking water and clean sanitary facilities.

### **Equal Treatment and Non-Discrimination**

A culture of equal opportunity and mutual trust and respect is of great importance to us. We support equal opportunity and prevent discrimination when hiring employees and promoting and granting further education and training. We treat all employees equally, irrespective of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or beliefs.

### **Cooperation with Employee Representatives**

Trust and close cooperation with employees is an important part and proven pillar of ExpressKabel's corporate policy. Our basis of mutual trust and cooperation is open and constructive dialog characterized by mutual respect.

### **Freedom of Association**

ExpressKabel respects the right of employees to freedom of association and collective action. Employees are free to form or join associations representing their interests.

### **Public Conduct and Communication**

We respect the right to freedom of expression and the protection of personal rights and privacy. Employees should be aware that they may also be perceived as representatives of ExpressKabel in private and are therefore asked to uphold the company's reputation through their conduct and appearance.

### **Work Safety and Health Protection**

The safety of our employees is a central tenant of our corporate policy. We avoid personal risk through preventive work safety measures and protect our employee's health through good working conditions. Work safety is also part of the responsibility of each employee. Hazards must be prevented through foresighted, cautious and safe conduct. Risks and defects must be reported to the supervisor immediately.

### **Workplace Ergonomics**

As another precaution against work accidents and, especially, occupational illness, all workplaces comply with legal and recognized security and occupational medicine requirements to ensure accident-free and low-stress work.

### **Personal Protective Equipment**

Safety shoes are required when entering the warehouse. Gloves are also recommended when working with machines or packing and are provided by the employer. Other gloves are not permitted.

### **Fire Safety**

All necessary measures are taken to comply with legal fire safety regulations.

### **Emergency Management**

The supplier agrees to recognize and, where possible, eliminate any risks and implement an emergency response plan to ensure the continuation of business activity.

### **Complaint Management**

The supplier is responsible for establishing effective complaint management for individuals and groups that may be subject to adverse effects.

### **Conflict Minerals**

For the conflict minerals tin, tungsten, tantalum and gold and other resources, such as cobalt, the company establishes processes in compliance with the Organisation for Economic Cooperation and Development (OECD)'s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects the same from its suppliers. Foundries and refineries without properly audited due diligence processes are to be prevented.

## **2. Ecological Responsibility**

### **Environmental and Climate Protection**

ExpressKabel is aware of the ecological impact of its business activity and committed to protecting the soil, water, air, climate, biodiversity and cultural assets. Our aim is to develop solutions with our partners to:

- Minimize adverse effects of our activity on the environment and prevent environmental damage.
- Conserve resources and optimize resource management.
- Systematically reduce emissions harmful to the environment and climate.

We integrate environmental and climate protection into our entire project process and comply with all related laws and official regulations. We assist our employees with this through qualified further education and training. Our aim is to work as energy-efficiently as possible and prevent waste through effective and consequent management.

Sustainable environmental and climate protection and resource efficiency are important aims for us. When developing new products and operating production facilities, we try to keep the impact on the environment and climate as low as possible and have our products contribute to the environmental and climate protection of our customers. Every employee is responsible for conserving natural resources and contributing to environmental and climate protection through their actions.

### **Our Accident and Fault Management**

Is based especially on the principle of prevention. In addition to the above-stated provisions on the work safety and health protection of our employees, this especially includes protection against fire, accidents and poisonous substances.

### **Emergency Management**

Protection is achieved through preventive measures. These include clear work instructions and regulations on accident prevention. Compliance with these measures is monitored by the supervisor and ensured through various technical installations, including safety installations on machines and facilities, such as lighting, ventilation and heating systems. We also achieve this protection through emergency response training as part of our annual work safety instructions, participation in which is mandatory for all employees and include proper use of personal protective equipment, handling of hazardous substances and chemicals, skin and health protection, treatment of technical equipment and how to act in case of fire or danger and provide first aid.

### **Accident Reporting**

Any work accidents or other disruptions that occur despite all preventive measures must be reported immediately, at the latest, within 3 working days. This especially applies to work accidents resulting in the disability of an employee or third party. Such work accidents must be reported to the competent accident insurance provider as soon as possible and documented in the first aid book. Accident reports must include the course, consequence and cause of the accident and intended measures for future prevention of similar accidents. These measures must be developed and implemented as soon as possible.

### **Fire Safety**

Fire safety is also based on preventive measures and follows legal requirements. How to act in case of fire is also part of the annual fire safety instructions. Furthermore, trained fire safety experts have been appointed who assist our employees in case of questions. In addition, all of our facilities and systems are designed to minimize risk of fire. This is further ensured through regular maintenance and tests (e.g., by TÜV or other testing institutes).

### **Industrial Wastewater Treatment and Removal**

Wastewater from operating procedures, production processes and sanitary systems must be typified, monitored and, if necessary, treated before introduction or removal. Furthermore, measures should be implemented to reduce wastewater production.

### **Air Emissions**

General emissions from operating procedures (air and noise) and greenhouse gas emissions must be typified and routinely monitored, tested and, if necessary, treated before release. The supplier must also monitor exhaust gas treatment systems and find economic solutions to minimize emissions.

### **Waste and Hazardous Substances**

The supplier follows a systematic procedure to identify, manage, reduce and properly dispose of or recycle waste. Chemicals and other materials that may pose a risk when released into the environment must be identified and treated to ensure safety during handling, transport, storage, use, recycling, reuse and disposal.

### **Energy Consumption/Efficiency**

Energy consumption must be monitored and documented. Economic solutions must be found to improve efficiency, minimize consumption and use renewable energy.

## **3. Ethical Business Conduct**

### **Fair Competition**

The standards of fair practices, fair advertisement and fair competition must be followed. Furthermore, applicable anti-trust laws must be applied, especially those that prohibit agreements or other activity that influence prices or conditions towards competitors. These provisions also prohibit agreements between customers and suppliers limiting the freedom of customers to set resale prices and conditions.

### **Confidentiality/Data Protection**

The supplier agrees to meet the expectations of principals, own suppliers, customers, consumers and employees concerning the protection of private information. The supplier must comply with data protection and information security laws and official regulations when collecting, storing, processing, transmitted or transferring personal information.

### **Intellectual Property**

Intellectual property rights must be respected; technology and know-how transfers must protect intellectual property rights and customer information.

### **Integrity/Bribery, Undue Advantages**

All business activity must be based on the highest standards of integrity. The supplier must practice zero tolerance when enforcing the prohibition on any forms of bribery, corruption, extortion and misappropriation. Procedures for monitoring and enforcing these standards must be applied to ensure compliance with anti-corruption laws.

### **Conflict of Interest Policy**

Personal interests of employees should not impair judgment in business matters or create the impression of doing so.

#### **4. Implementation of Requirements**

We expect our suppliers to identify risks in supply chains and take adequate measures. In case of suspicions of violations and to secure supply chains with increased risk, the company requires supply chains to be disclosed. The company uses self-assessment surveys and sustainability audits at production sites of suppliers to review compliance with the standards and provisions in this document. The company reserves the right to take measures which may result in the suspension or termination of the supply relationship with suppliers who do not satisfy these requirements.

#### **5. Supplier's Acknowledgement and Consent**

By signing this document, the supplier agrees to act responsibly and comply with the stated principles/requirements. The supplier confirms to communicate the content of this code of conduct to employees, agents, subcontractors and suppliers effectively and assures to implement all necessary measures properly.



2025-03-24 Managing Director Björn Etzel

ExpressKabel GmbH