

For HELUKABEL Business Partners

CODE OF CONDUCT

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HELUKABEL Code of Conduct

HELUKABEL is a family-owned company operating on a global scale, standing for quality, reliability, and innovation. HELUKABEL has made it its mission to deliver energy and communication reliably and consistently to their destinations—even in the most impossible conditions.

HELUKABEL places great value in integrity and sets high standards for ethically sound, compliant, and legal operation. To produce its products, HELUKABEL globally sources raw materials, goods, and services and, from its business partners, expects the highest standards for ethically sound, compliant, and legal operation not just within their own company, but also externally in local and global supply chains.

HELUKABEL does not make any demands on its business partners that HELUKABEL is not prepared to meet itself. With this code of conduct, HELUKABEL is assuming its responsibilities with regard to business and societal climates.

The principles and requirements of the code of conduct are based on those of the UN Global Compacts, the Supply Chain Act, and human rights, as well as other international standards, conventions, and guidelines.

HELUKABEL will define the principles and requirements and expects that business partners align themselves with these, as well as take measures to fulfil these:

COMPLIANCE WITH LAWS

Compliance with all applicable laws and legal requirements in the countries in which you are active or located in, and compliance with contractual obligations.

SOCIAL RESPONSIBILITY

- **Child labour:**
Ensure that the prohibition of child labour is upheld. Business partners are required to adhere to the recommendation of the ILO Conventions regarding minimum age for child employment. The employment of children under the age of 15 must be avoided.
- **Discrimination:**
Guarantee that all employees are treated without discrimination. Prohibit and combat direct or indirect discrimination on the basis of ethnic heritage, national or social origin, gender, sexual orientation age, health status, disabilities, religion or beliefs, political or other ideologies, or other factors (skin colour, language, financial situation, childbirth).
- **Forced labour | Slavery:**
Prohibit forced labour, slave labour, or other comparable labour. Labour must always be completed voluntarily and free of threats or punishments. Employees must be able to terminate their own employment at any time. Furthermore, may no unacceptable treatment of employees such as psychic hardship, sexual harassment, or abasement occur.
- **Freedom of association and to form a coalition:**
Employees have the right to establish organisations of their choice, to join these, to engage in collective bargaining, and to strike. Discrimination against employees based upon the founding or membership of such organisations is prohibited.

- **Equal treatment:**
The promotion of diversity, equal opportunity, and equal treatment at the work-place.
- **Employee treatment:**
Employees are to be treated with respect and the use of physical punishment, psychic or physical compulsion, or any form of mistreatment, harassment, or the threat of such measures is prohibited.
- **Security forces:**
No appointment of private or public/state security forces if, due to insufficient instruction or control by the company, the appointment of security forces would violate the prohibition of torture and cruel, inhumane, or humiliating treatment, present a danger to life and limb, or impede the freedom of assembly.
- **Fair compensation:**
Regular hours worked and overtime must be in conformity with the national legal minimum wage. Employees are to be provided with all legally mandated benefits. Wage deductions as a disciplinary action or other unlawful deductions are not permitted.
- **Working conditions:**
Working conditions must be fair and the applicable regulations regarding working hours and vacation must be obeyed. Working hours that extend beyond the regular weekly working hours are worked voluntarily.
- **Occupational safety and health protection:**
Regulations regarding safety and health protection at the workplace must be obeyed. Introduce and develop an occupational health and safety management system.
- **Accident avoidance:**
Create safe processes for employees to minimise workplace accidents during business operations.

ECOLOGICAL RESPONSIBILITY

- **Environmental protection:**

Compliance with environmental standards and laws. Introduction of a suitable environmental management system. The continual improvement of environmental protection measures in business operations via the minimisation in use of environmental pollutants and hazards.

- **Responsible procurement:**

No direct or indirect procurement of minerals from conflict zones or high-risk zones. These minerals include conflict minerals (tin, tungsten, tantalum, and gold), rare earth minerals, and other minerals or metals (e.g., bauxite, cobalt, titanium, lithium). Ensure transparency regarding material origin if a product contains one or more conflict minerals. The use of smelters without a proper and verified due diligence process is prohibited. Compliance with the regulation on forbidden and declarable substances (REACH |RoHS) for substances and mixtures in products. The use of mercury must be in accordance with the prohibitions of the Minamata Convention of 10 October 2013 and persistent, toxic pollutants in accordance with the Stockholm Convention of 23 May 2001 in its current form.

- **Prohibition of the unlawful removal of land, forests, or water:**

The unlawful removal of land, forests, or water, whose use ensures the livelihood of a person, is prohibited.

- **Emissions:**

Emissions stemming from business operations (air pollutant and noise emissions), as well as greenhouse gas emissions, must be typified before their release, routinely monitored, tested, and treated if necessary. Waste gas purification systems are to be monitored and economic solutions to reduce emissions should be sought after.

- **Handling of waste and hazardous substances:**

Reduce waste and systematically dispose of or recycle waste responsibly. Determine which chemicals or materials could present a danger when released into the environment so that it may be assured that these materials are handled safely.

- **Energy and resource efficiency:**

Reduce or avoid the use or consumption of resources during production and avoid producing waste of any kind, including water and energy.

BUSINESS ETHICS

- **Prohibition of corruption and bribery:**
Compliance with current anti-corruption laws and rejection of all forms of corruption, bribery, and embezzlement. No paying or receiving of bribery money, illegal payments, or other assets. Business partners must follow a zero-tolerance policy.
- **Money laundering and the financing of terrorism:**
Compliance with legal obligations to prevent money laundering and the financing of terrorism in accordance with applicable provisions. Participation in activities associated with money laundering and the funding of terrorism is forbidden. Take appropriate measures to not be unintentionally involved in money laundering activities.
- **Invitations and gifts:**
Gifts and favours must be permissible in accordance with current law and follow market customs. Do not accept cash gifts or monetary benefits.
- **Conflicts of interest:**
Avoid any conflicts of interest that may arise from personal relationships or from external financial or otherwise activities, including those involving family members or other closely affiliated individuals or organisations. Decisions must be exclusively made based on a factual basis.
- **Antitrust and competition law:**
Respect free and fair competition. Do not participate in anticompetitive agreements or the unlawful exchange of information related to competition, and no abusive exploitation of a dominate market position.
- **Export control:**
Comply with current laws, as well as applicable sanctions and embargos. Document imports and exports.
- **Intellectual property:**
Protect intellectual property. Do not divulge commercial property such as patents, trademarks, and expertise to third parties.
- **Data protection:**
Comply with all applicable data privacy laws and regulations. Protect confidential information from third party access, including personal information, from unauthorised access, deletion, use, and publication using appropriate physical and electronic security measures. Ecological responsibility.

IMPLEMENTATION OF GUIDELINES AND REQUIREMENTS

The guidelines and requirements represent the minimum requirement for our cooperation. HELUKABEL encourages its business partners to behave ethically and sustainably, for itself and its employees, while taking into consideration their concrete needs and, if applicable, other codes of conduct with higher standards.

Should a business partner become non-compliant with these standards and guidelines, HELUKABEL expects immediate notice of the event and the underlying causes, as well as what corrective measures are being taken.

Should there be a violation of this code of conduct, HELUKABEL will notify the business partner in writing and set a grace period by when this violation must be remedied. Should no remedial measures be taken within the grace period, HELUKABEL reserves the right to terminate one or more contracts with the business partner once the grace period ends.

COMMENTS AND COMPLAINTS FROM BUSINESS PARTNERS

Business partners are able to address any concern with or violations of the guidelines defined in this code of conduct without the fear of retaliation. Complaints can be submitted (anonymously) using the following form:

<https://eu.deloitte-halo.com/helukabel-speakup/?Pg=1&Lang=en-US>



HELUKABEL expects that its business partners provide a similar reporting channel if it is required by law.

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