

Code of Conduct

... (griech. *ethos* = Gewohnheit, Sittenlehre); **E|thik** (griech. *ethos* = Gewohnheit, Sittenlehre); **E|thik**, die; -, -en
(griech.) (Sittenlehre)
der sittlichen und
Grundsätze [eine]
E|thiker (Verf.)
e|thisch (sittl.)
e|thik, vgl. **E|thik**

Code of Conduct

Statement of the Management



This Code of Conduct outlines the principles of SAB Bröckskes GmbH & Co. KG as well as the requirements for our suppliers. The management has established these principles to define the ethical standards for all our business activities.

As a major employer in the region and a globally operating company, we are aware of our responsibility towards people and the environment. Therefore, we have defined binding principles of conduct, which also serve as guidelines for our suppliers. Human rights, environmental protection, labor standards, and anti-corruption efforts are core values for SAB, which we consistently uphold towards our employees, business partners, and the public.



With this Code, we promote a corporate culture where ethical and responsible behavior is a given. In doing so, we protect our most valuable asset – our good reputation. At the same time, these principles create sustainable value for our customers and partners. The Code sets the standard and supports us in implementing it in practice.

Our Code is based on three key principles:

Customer Focus: We build long-term relationships to create sustainable value. In doing so, we place great importance on profitability and on identifying and resolving conflicts of interest at an early stage.

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Excellent Service: We set the highest standards – both for our products and for our collaboration within the company. This is the only way we can offer our customers the best possible solutions.

Sustainable Performance: We continuously strive to strengthen our reputation as a reliable company and to offer our customers the best solutions.

It is crucial that all employees and partners adhere to these principles at all times. Because when we do the right thing as a company, we become more successful – and remain competitive in the long term.

Management



Peter Bröckskes



Sabine Bröckskes-Wetten

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Laws, Rules and Regulations

Compliance with Laws

Every employee at SAB Bröckskes is required to comply with all applicable laws, regulations, and internal guidelines relevant to their work environment.

International Business and Human Rights of External Stakeholders

When conducting business across borders, we adhere to all applicable laws, regulations, and rules – both domestically and internationally.

When dealing with foreign customers – whether as a supplier or buyer, during visits, or in consultations – we must actively inform ourselves about the relevant regulations, laws, or directives and strictly comply with them.

We respect all laws, regulations, and rules, including antitrust and competition laws. However, it is not only important for us to comply with all applicable laws ourselves – our suppliers and partners are also obligated to do so. To ensure compliance with human rights, environmental standards, and quality requirements, we assess our suppliers through a supplier questionnaire.

Fraud, Bribery, and Corruption

We do not tolerate any unlawful preferential treatment in the form of bribery or similar practices. Business courtesies are only accepted if they align with common business practices – and only if they do not influence business decisions. To ensure transparency, fairness, and freedom from corruption, we adhere to the policy on handling gifts from customers and suppliers. Bribes or cartel agreements are not acceptable means for securing a contract. We would rather forgo a business opportunity or fail to achieve internal targets than violate the law. Violations will not be tolerated

and will result in sanctions against those involved. All executives, managers, and employees must be aware of the significant risks that cases of corruption or cartel violations pose to the company – and to them personally. Every employee is expected to actively ensure compliance with these regulations within their area of responsibility. If fraud, bribery, or corruption occurs, or if there is a justified suspicion, employees and external stakeholders have the opportunity to report it through the „hintcatcher“ whistleblowing channel.

Money Laundering Prevention

SAB complies with its legal obligations to prevent money laundering and does not participate in any money laundering activities. Every employee is required to have unusual financial transactions – especially those involving cash that could raise suspicion of money laundering – reviewed by the responsible finance department in case of doubt.

Responsible Conduct

For us, responsible conduct is guided not only by laws and regulations but also by individual diligence and the standards defined in these guidelines

Avoidance of Conflicts of Interest

At SAB, business decisions are made exclusively in the best interest of the company. Conflicts of interest with private matters or other economic or personal activities – including those involving relatives or other closely associated individuals or organizations – should be avoided from the outset. If such conflicts do arise, they must be resolved in compliance with applicable laws, regulations, and corporate policies. The prerequisite for this is the transparent disclosure of the conflict.

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Acting Responsibly and Ethically

Customer Relationships

We build long-term relationships with our customers and secure their loyalty by earning their trust. We strive to anticipate our customers' needs – even before they ask. Our goal is to provide them with the best possible service.

We treat all customers fairly and with the same level of respect and courtesy – regardless of the size of their business volume.

Correct Market Conduct

We outperform our competitors through superior performance – not by using unfair or unethical practices. We do not distort or conceal facts or the truth. Likewise, we do not use information to which we are not entitled to gain an unfair advantage over our competitors.

We reject any form of anti-competitive practices. We act fairly, honestly, and in good faith toward everyone we interact with – including customers, business partners, competitors, suppliers, the public, and our colleagues.

Employee Culture

At SAB Bröckskes, we consider our employees the most important factor in the company's success. Only through the expertise, social skills, creativity, and energy of all employees can we achieve our ultimate common goal – customer satisfaction and the long-term preservation of jobs.

Therefore, employee motivation is a key component of our corporate philosophy. We not only pay the statutory minimum wage but also regularly assess whether salaries meet a living wage. As a reference, we use 60% of the current gross median salary in Germany.

Additionally, we comply with regulations regarding working hours and respect the right to freedom of association. Every employee receives vacation time beyond the statutory minimum and has the right to be unavailable during this period, as vacation should serve solely for rest and recovery.

We strictly reject forced labor, slavery, and child labor in any form.

Equal Treatment and Equal Opportunity

A culture of equal opportunity, mutual trust, and respect is of great importance to us. We promote equal opportunities and prevent discrimination in hiring, promotions, and access to training and development programs.

We treat all employees equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religion, or belief. Discrimination of any kind is not tolerated. Bullying and harassment are not tolerated in our company. Should such incidents occur, we encourage everyone to speak up.

Dealing with Customers and Suppliers

Our relationships with customers and suppliers are based on mutual respect, fairness, and trust. We always strive for reliable long-term partnerships and therefore maintain fair and open communication in our interactions. We expect the same from our business partners.

We uphold ethical and recognized business practices, promote fair competition, and prioritize responsible sourcing.

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Quality

We aim to convince our customers through consistently flawless performance. Therefore, we align ourselves with the highest quality standards at all levels. To achieve this, we implemented a Quality Management System according to DIN EN ISO 9001 in 1996. This allows us to continuously identify measurable parameters to detect improvement potential, derive actions, and assess their effectiveness. Our ultimate goal is to achieve the sustainable satisfaction of our customers.

Occupational Health and Safety

The safety and health of our employees are equal corporate goals alongside the quality of our products and economic success. Occupational safety and health protection are integral parts of all operational processes and are considered from the outset – even in the planning phase – in technical, economic, and social considerations.

Each employee promotes safety and health protection in their work environment and adheres to occupational safety and health regulations. Every manager is required to instruct and support their employees in fulfilling this responsibility.

We comply with legal occupational safety regulations and protect our employees from hazards in their work. To systematically implement these occupational safety requirements, we introduced an Occupational Safety Management System according to NLF/ILO-OSH and DIN ISO 45001 in 2009.

We also expect our suppliers to comply with the applicable occupational safety regulations..

Collaboration

We think across departments and countries and see our company as a unified entity. It is especially important to us that we listen, openly discuss topics, actively seek out different opinions, and work together to find solutions. The best solution emerges from the exchange of various perspectives. We provide constructive feedback in a factual manner, not personally.

Sustainable Environmental and Climate Protection

Sustainable environmental and climate protection, as well as resource efficiency, are important corporate goals for us. Both in the development of new products and the operation of production facilities, we strive to minimize the impact on the environment and climate. Our products are intended to make a positive contribution to environmental and climate protection for our customers.

Every employee is responsible for handling natural resources with care and contributing to the protection of the environment and climate through their individual actions.

We comply with environmental protection regulations and standards and actively contribute to the preservation of our environment. In 2006, we introduced a certified Environmental Management System according to DIN EN ISO 14001. With this, we fulfill our self-imposed obligation to preserve natural resources for ourselves and future generations.

Supply Chain

We expect our suppliers to apply all the principles of this Code of Conduct, or an equivalent internal code of conduct, throughout their organization. If a supplier applies their own Code of Conduct, it must be provi-

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ded to SAB. Additionally, we encourage all suppliers to ensure compliance with a Code of Conduct throughout the entire supply chain.

We reserve the right to review the application of the Code of Conduct generally or on a case-by-case basis. This may take the form of a questionnaire, an evaluation, or an audit. If gaps in compliance with applicable legal regulations or inappropriate behavior are identified, the supplier will be asked to take corrective actions. If these gaps cannot be closed or the misconduct cannot be avoided, further individual consequences will be necessary.

Energy Management

Our energy management is part of our sustainability management. All significant energy data (such as electricity consumption) serves as the basis for creating a greenhouse gas inventory. Our goal is to reduce our emissions by addressing Scope 1 (emissions from sources directly owned or controlled by us) and Scope 2 (indirect emissions from the use of purchased electricity, steam, heat, or cooling) in order to continuously reduce our CO₂ footprint.

We Invest in Our Communities

We see ourselves as an active member of society and are committed in various ways. We continuously assess how we can contribute to the well-being of local communities. To this end, we support charitable initiatives with financial and other resources.

Handling of Information and Data

Trade secrets and business information of our partners are treated with sensitivity and confidentiality.

Publications

When we share or disclose information with the public, we ensure that it is as accurate, up-to-date, and understandable as possible.

Insider Information

We use insider information (important, non-public information) exclusively for the purpose for which it was originally provided to us. We carefully assess whether information constitutes insider knowledge and only share it with those who actually need it for their work. This applies to both individuals within and outside of SAB. We adhere to our internal policies and regulations in this regard.

Confidentiality of Customer Data

Our customers rely on us to securely store their information and use it only for the agreed-upon purposes. We adhere to the highest standards of information security to ensure that our customers' information remains confidential and that their legal data protection rights are upheld.

Through strict standards and procedures for data security, we ensure that the data is not manipulated, stolen, lost, destroyed, or exposed to unauthorized access. We only share customer data when it does not violate our customers' legal data protection rights and when our customers have explicitly consented to it.

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Health and Safety of Customers and the Environment

To best protect our customers and offer a product that is as safe and environmentally friendly as possible, our raw materials and materials undergo various testing mechanisms. These are explained in more detail below.

Conflict Metals

We have written declarations from our suppliers confirming that the products supplied to us do not contain so-called conflict metals (especially tin) that were mined in the Democratic Republic of the Congo or its neighboring countries. The information provided is based on details from our wire and cable suppliers.

Absence of Harmful Substances according to RoHS

Our products are free of harmful substances acc. to RoHS II Directive 2011/65/EU and the delegated Directive (EU) 2015/863, which amends Annex II of Directive 2011/65/EU, as well as the Hazardous Substances Ordinance Annex IV-No. 24.

The materials used in the specified products are free of hazardous substances and comply with the aforementioned directives and the Hazardous Substances Ordinance Annex IV-No. 24 regarding flame retardants.

REACH Regulation

Regulation (EC) No. 1907/2006. The REACH regulation governs how and why manufacturers, importers, users, and distributors must investigate, assess, pre-register, and register chemical substances.

SAB Bröckskes GmbH & Co. KG acts as a downstream user of chemicals under REACH as a producer of products. Products are exempt from registration under REACH.

However, substances may be present in our products, as they can be ingredients of materials used in the production of our products. The European Chemicals Agency (ECHA) has published a list of Substances of Very High Concern (SVHC), which is regularly updated. We maintain regular communication with our suppliers regarding SVHCs.

Once an SVHC candidate substance is identified as part of one of our products in a concentration of $\geq 0.1\%$ by weight, we initiate substitution measures to replace the affected materials with equivalent alternatives. If this is not possible, we will fulfill our information obligations and declare the substances for the affected product.

Global Automotive Declarable Substance List

The Global Automotive Declarable Substance List (GADSL) is a list of substances that can be used in automotive parts and remain in the vehicle throughout its entire lifecycle. It is the result of years of global efforts by representatives of the automotive industry to simplify communication and information exchange regarding the use of specific chemical substances in automotive parts.

The GADSL includes declarable and prohibited substances. Although there are no legal obligations regarding the GADSL itself, it serves as a tool for implementing legal measures, such as the material recovery of end-of-life vehicles in the EU acc. to Directive 2000/53/EC on End-of-Life Vehicles.

We, SAB Bröckskes GmbH & Co. KG, maintain continuous communication with our material suppliers

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regarding the substances contained in their products. We have received the relevant substance declarations from our suppliers, indicating whether any substances from the GADSL, whether declarable or prohibited, are included. Upon request, we will gladly provide the required information in the form of a substance declaration.

Implementation

SAB Bröckskes GmbH & Co. KG and its subsidiaries actively promote the communication of the guidelines underlying the Code of Conduct. Each company is responsible for implementing these guidelines and ensuring that no employee is disadvantaged by complying with the guidelines or agreements.

Our leaders play a special function as role models and are particularly accountable for their actions according to the Code of Conduct. They are the first point of contact for any questions regarding the understanding of the regulations and ensure that all employees are familiar with and understand the Code of Conduct. In their leadership role, they prevent unacceptable behavior and take appropriate measures to prevent violations within their areas of responsibility. A trusting and good working relationship between employees and leaders is reflected in honest and open communication as well as mutual support.

Contact Person

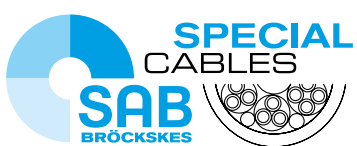
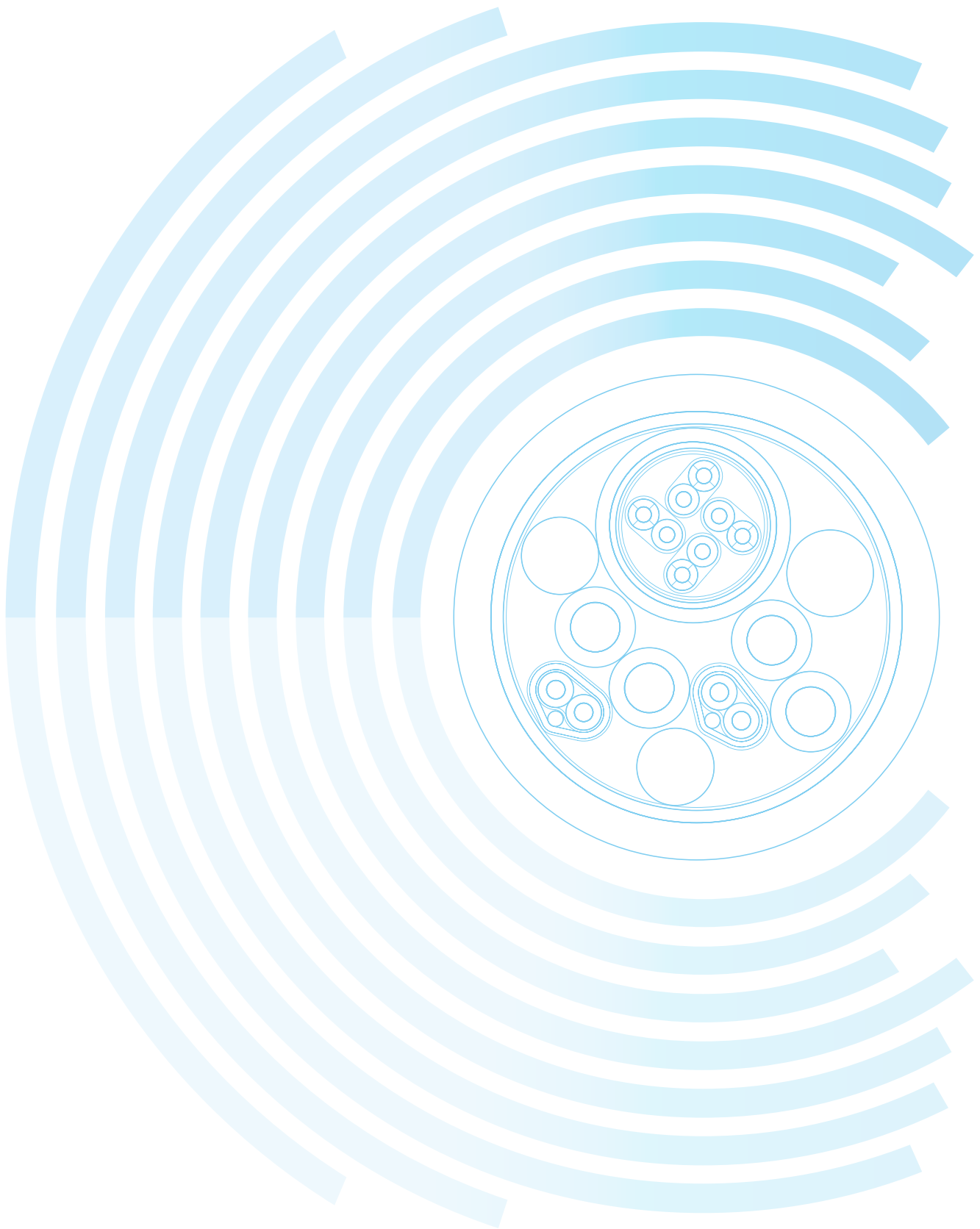
For further questions regarding the Code of Conduct, all employees as well as third parties (customers, suppliers, etc.) can contact the following central email address: codeofconduct@sab-cable.com

Whistleblowing

Any indications of potential legal violations or bre-

ches of the Code of Conduct can be reported via the online whistleblowing tool „[hintcatcher](#)“. All information will be treated with strict confidentiality.

The Management



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