



SUPPLIER CODE OF CONDUCT



VERSION 2/DECEMBER 2025

ENGLISH EDITION



Preamble

COFICAB is a global leader in the design, manufacturing, and sales of wires and cables.

Our core values - Passion, Ethics, Commitment and Teamwork are values that COFICAB is extremely proud of as they represent the cornerstones of COFICAB's sustainable development.

COFICAB is committed to conducting its business in an environmentally responsible and social manner, embedding sustainability into every aspect of our operations.

Supplier plays a vital role in COFICAB's value chain and are essential to our continued success.

To ensure alignment with our values and expectations, this **Supplier Code of Conduct** ("Code") sets forth the minimum standards that all suppliers must meet when conducting business with COFICAB and interacting with our employees

This Supplier Code of Conduct is based on COFICAB's Code of Conduct, internal policies as well as international conventions and standards on ethical business conduct, labor practices, human rights, and sustainability.

This Supplier Code of Conduct includes the following **sections**:

- I. GENERAL**
- II. LABOR AND HUMAN RIGHTS**
- III. OCCUPATIONAL HEALTH AND SAFETY AT WORK AND ENVIRONMENTAL SUSTAINABILITY**
- IV. BUSINESS INTEGRITY**
- V. GLOBAL TRADE**
- VI. REPORTING**
- SUPPLIER ACKNOWLEDGMENT AND CONSENT**



I. GENERAL:

This Code, and all policies mentioned within, shall form an integral part of any agreement between COFICAB and the suppliers. It applies to all COFICAB suppliers, including subsidiaries, affiliates, employees and agents (hereinafter individually and collectively referred to as the “Supplier”).

Suppliers are required to extend the outlined in this Supplier Code of Conduct. to their own affiliates, contractors, and subcontractors, ensuring alignment with COFICAB’s ethical, social, and environmental expectations throughout the entire supply chain.

The Supplier must fill in a self-assessment questionnaire *to ensure continued compliance with the standards set out in this Code.*

The Supplier grants COFICAB the right to conduct sustainability audits at the supplier’s production sites, at any time with reasonable prior notice, to monitor compliance with this Code.

Any noncompliance with this Code of Conduct would result in serious consequences, including but not limited to, termination of the business relationship with COFICAB.



II. LABOR AND HUMAN RIGHTS:

COFICAB is firmly dedicated to promoting Human Rights standards through COFICAB's "Human Rights Policy".

Therefore, the Supplier shall respect this Policy including the following obligations:

1. A Violence-free/harassment-free Workplace:

The Supplier should condemn any acts of violence, threats, or abuse, whether physical, or verbal or psychological in its workplace.

The Supplier should prohibit harassment, bullying in any form, intimidation and coercion in the work environment.

2. Equal opportunity/Non-discrimination:

The Supplier should be firmly committed to providing equal opportunity in all aspects of employment. Employees should be recruited, rewarded, and promoted based on their merit, performance.

Discrimination of any kind- including, but not limited to, , race, nationality, religion, gender, age, sexual orientation, marital status, pregnancy, or disability- is strictly prohibited.

The Supplier should promote a workplace culture, that promotes diversity, equity, and inclusion, ensuring all employees are treated with fairness, dignity, and respect.

3. Child labor and forced labor:

The Supplier must strictly prohibit the use of child labor and shall not condone or employ anyone below the legal minimum working age, in accordance with applicable laws and international standards.

Supplier must not engage in or tolerate any form of forced labor, slave labor, minorities labor, or similar form of labor may be used. All, employment must be voluntary, and employees must be able to end the work or the employment relationship at any time.

4. Working hours/salary wages:

The working hours must comply with the applicable laws and industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed a total of legally permitted overtime hours per week.

The wage for regular working hours and overtime must comply with at least the statutory national minimum wage or the customary minimum wage for the industry, whichever is higher. In every case, the wage for overtime hours must be higher than the wage for regular hours.

In addition, Supplier is also committed to full compliance with all immigration laws.

5. Freedom of Association:

Supplier's employees are entitled to freedom of association as provided by relevant legislation.

6. Unlawful Eviction of Land:

Supplier's business activities affecting directly or indirectly residents, people, and communities shall not lead to unlawfully evicting or depriving people of their homes, lands, and waters. Supplier shall respect their rights.

7. Prohibition of Violent Security Forces:

The Supplier shall refrain from hiring or using violent private or public security forces., Under no circumstances shall the Supplier allow the use of excessive force, cruel, and inhumane treatment or excessive force leading to injuries of life/body or impairing the freedom of assembly and association shall be allowed by the Supplier to hire security forces.



III. OCCUPATIONAL HEALTH AND SAFETY AT WORK AND ENVIRONMENTAL SUSTAINABILITY:

1. Occupational Health and Safety at work:

COFICAB expects Supplier's to implement effective operational and management systems, as well as its employees, to work towards preventing occupational injuries and illnesses. Therefore, we expect our suppliers to promote the application of occupational health & safety standards and policies which guarantee:

A Safe & Healthy work Environment which meets the requirements pertaining to the prevention of occupational risks, in accordance with the provisions of international labor standards, the legislation of the country where they carry out their activity, and COFICAB requirements.

Safe Facilities that guarantee industrial hygiene, adequate lighting and ventilation, clean and accessible toilets, and safe access to potable water. The workplace must be equipped with appropriate fire safety systems and personal protective equipment (PPE) suited to each specific activity. Furthermore, the facilities must be constricted, maintained, and operated in accordance with applicable health and safety regulations Preventive measures to eliminate or reduce the risk of workplace and occupational diseases, providing responses to emergency situations during work activities.

Emergency plans must include clear procedures for warning and evacuation workers, regular training sessions and drills, in emergency situations, appropriate first-aid supplies. Availability of effective fire detection, and fighting equipment, and clearly marked and unobstructed exits., As well as readiness to provide medical care during emergencies ensuring the safety of employees and others who may be affected during the development of the operation.

Supply of materials, spare parts, and equipment must comply with Occupational Health and Safety regulations in force and meet all applicable legal requirements to ensure a safe working environment.

2. Environmental Sustainability:

COFICAB is committed to preserving the environment, by complying with all applicable environmental laws and regulations, showing continuous improvement in its environmental

performance, and following industry best practices for this purpose. Therefore, COFICAB requires its Supplier to comply with all legally applicable environmental requirements, in force in each country where the Supplier has operations, minimizing impacts on the environment, promoting measures that combat climate change, respecting biodiversity, land use, deforestation and taking in consideration soil quality, animal welfare, noise emissions as well as proving continuous improvement of its environmental performance and in general, to act in an environmentally responsible manner.

The Supplier should make every effort to obtain, keep up-to-date and closely follow the guidelines regarding the reporting of all required environmental permits and ensure that those records are accurate and always in compliance with legal requirements.

The Supplier should document and implement an appropriate environmental management system (based on international standards such as ISO 14001:2015) designed to identify, control, and mitigate significant environmental impacts.

Supplier is expected to optimize energy efficiency and consumption of natural resources, including the commitment to responsible use of renewable energy and water, and to recycling whenever possible. Life cycle analyses/assessments should also be considered in order to reach the best environmental solutions throughout the entire value chain.

The Supplier must implement and prove viable measures to prevent pollution, and minimize the generation of solid waste, wastewater, and atmospheric emissions (GHG). Before discharging or disposing of waste, the Supplier must characterize and treat wastewater and solid waste appropriately and in accordance with current legislation and regulations. Furthermore, emissions are to be monitored, controlled, and treated as required to achieve decarbonization targets.

The management of raw materials is deemed important for COFICAB, considering the high consumption of valuable materials as an essential part of the production process.



Materials used by the Supplier are to be reduced, when possible, by practices such as production modification and technological improvements, maintenance and facility processes, materials substitution, conservation, recycling, and reusing of materials.

As for the safety of the products supplied, the Supplier must comply with the legislation in force in the country where the supply takes place. Products will be well packaged and labeled in accordance with local legislation and international agreements on transporting of dangerous goods. For Chemical products, the Supplier must provide the Safety Data Sheet, to ensure their safe handling, movement, storage, use, recycling or reuse and disposal, as well as any other information which shall allow COFICAB to fulfill its obligations. The Supplier must ensure that its key employees are trained and aware of the practices used for chemical products management.

IV. BUSINESS INTEGRITY:

1. Conflict of Interest:

Supplier's employees are expected to avoid engaging in any activities that conflict with or appear to conflict with the best interest of the Supplier or its Customers, including COFICAB.

Conflict of interest includes any situation, in which a supplier, employee, potential employee, or any other stakeholder has an actual, or potential interest, whether financial and non-financial which may influence, their ability to make objective and impartial decision while providing services to COFICAB,

Such situations can compromise objectivity and may adversely affect COFICAB's interests. Therefore, it is imperative that all parties disclose any real or perceived conflicts of interest promptly and take appropriate steps to manage or eliminate them.

2. Prohibition of corruption, bribery, fraud and money laundering:

The Supplier's employees are expected to have zero tolerance policy towards corruption and fully comply with COFICAB's "Anti Bribery & Anti-Corruption Policy" obligations and all governing

anti-corruption laws and regulations. As such, Supplier's employees should not accept, provide, offer, authorize, or promise to provide anything of value in order to secure an improper advantage or to obtain or retain business.

The Supplier should firmly be opposed to all forms of money laundering and shall comply with all applicable anti-money laundering laws. The supplier should implement effective measures to prevent COFICAB's financial transactions from being used for money laundering Purposes.

The Supplier is expected to undertake high standards of ethical business conduct actively prevent and fight corruption, bribery, fraud and money laundering and comply with all applicable international as well as national laws.

3. Fair Business and Competition:

In order for the Supplier to compete lawfully and with integrity, the Supplier must fully comply with all applicable competition laws in place in the countries where Supplier conducts business.

4. Personal Data Privacy:

The Supplier should handle personal data only to extent necessary for relevant business purposes, fulfilling customer requirements, and managing employee administration.

The Supplier should be committed to copying with all applicable Personal Data protection laws and regulations in every country, where it operates.

When processing Personal Data, the Supplier's duty to ensure that all data is managed securely and in full accordance with relevant legal, regulatory, and internal requirements, avoiding any unauthorized use, disclosure, or security incidents.

5. Confidentiality:

Supplier's employees should hold all Confidential Information in strict confidence and should not- directly, or indirectly, or in order to gain a benefit- disclose, photograph, use, copy, publish, summarize, use beyond the agreed purpose, destroy, delete, or remove any Confidential Information unless they obtain the written consent of the Legal Department and/or relevant entity leadership.

Supplier's employees should keep confidential the proprietary information of Supplier's customers, vendors, consultants, shareholders, employees, applicants, and other parties to the same level of care as they would do for Supplier's Confidential Information.

6. Intellectual Property:

Supplier should safeguard Supplier's Intellectual Property and fully respect the Intellectual Property of third parties.

Authorization and necessary legal documentation are needed before the intellectual property can be shared with third parties. If a Supplier's employee needs to share Intellectual Property with a business partner or third party, or if a third party is developing Intellectual Property for/with Supplier, Supplier's employee should contact the Legal Department to draft and review the partnership contracts and Non-Disclosure Agreements, or for legal guidance.

It is important to respect others' Intellectual Property. Third-party Intellectual Property should never be obtained improperly or used without proper licenses or approvals.

7. Financial Responsibilities & Accurate Records:

The Supplier should accurately record, maintain, and report business documentation, including but not limited to financial accounts, quality reports, time records, expense reports, and submissions to COFICAB, customers, or regulatory authorities.

The Supplier should maintain books and records that accurately and completely reflect all transactions related to its COFICAB business and each of its submissions to COFICAB, customers, and regulatory agencies must be accurate and complete. Supplier should never make any entry in their books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to COFICAB business.

8. Supply chain transparency

Suppliers must ensure full transparency in their supply chain, including traceability of the origin of products and materials supplied. Compliance with all applicable laws and regulations relating to ethical business practices, human rights and environmental protection is mandatory. In addition, suppliers must provide, upon request, detailed information regarding their sourcing, production processes, and measures adopted to prevent the use of child labour, forced labour or any other illegal or unethical practices.



V. GLOBAL TRADE:

1. Counterfeit Parts:

Supplier should develop, implement, and maintain methods and processes appropriate to its products and services to minimize the risk of introducing counterfeit parts and materials into products.

2. Export and Import Regulations:

Supplier should ensure to comply with national and international import and export control laws. These comprise but are not limited to sanctions, embargos, and other laws, regulations, and directives controlling the transmission or shipment of goods, technology, and payments.

3. Conflict Minerals:

The Supplier should understand the source of the raw materials used in its products. According to COFICAB's "**Conflict Minerals Policy**", the Supplier should reliably determine the origin and verify the source of such minerals in order to ensure that sourcing of such minerals does not directly or indirectly finance or benefit any armed groups, directly or indirectly breach human rights nor causes negative environmental impacts.

VI. REPORTING:

1. Complaint mechanism:

Supplier should establish an effective Reporting mechanism for its employees and third parties who could be affected by negative impacts.

2. No Retaliation:

Supplier should not tolerate any form of retaliation, against anyone for making a good faith report based on reasonable suspicions of actual or potential misconduct. Any retaliatory conduct against someone who has raised an ethics or compliance concern may be subject to termination for violation.

Retaliation is defined as any negative action taken against a person who, in good faith and based on reasonable suspicions, reports about actual or potential misconduct.

VII. TRAINING:

Supplier should schedule and conduct training programs for managers and workers to effectively implement the Supplier's policies, procedures, improvement objectives and to meet applicable legal and regulatory requirements.

VIII. INFORMATION AND CONSENT OF SUPPLIER:

By signing this document, Supplier commits to act responsibly and adhere to the principles and requirements specified herein. Supplier commits to communicate the content of this Code in a comprehensible manner to employees, contractors and subcontractors and to make all necessary arrangements to meet the relevant requirements.

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Date

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Supplier

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Name

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Function

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Signature / Company stamp



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