

# Code of Conduct

Klaus Faber AG

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## Preamble

Klaus Faber AG is one of the European Union's most important cable distributors. As a partner to trade and industry with worldwide projects, social and ethical responsibility have always been major yardsticks for us in our business activities. We meet this responsibility worldwide in the respective procurement markets as much as vis-a-vis our clients and business partners, our workforce, but also the environment and society overall.

Integrity, fairness and sustainability are the basis for responsible and ethical dealings with one another. This is what we have set ourselves the rules for that are detailed in this document.

We are meanwhile highly dependent on our suppliers and other business partners (hereafter: "suppliers") in our business activities as a distributor. Which is why we are not only judged by our own, but also the behaviour of our suppliers, and by the extent in which we ensure that our suppliers meet the same standards as us, and pass them on throughout the supply chain.

In doing so, we are not expecting anything from our suppliers that we are not prepared to live up to ourselves. We expect from all suppliers that the shared basic understanding of respect for human rights, of legal compliance and environmental protection as expressed in this document becomes an integral part of the contract, and is consistently implemented by them in their practices.

The observance of this framework is to be regularly monitored, with possibly necessary improvements realized, in cooperation with the supplier. Should there be serious violations and/or a lack of cooperation on the part of the supplier, we are entitled to end the business relationship immediately.

The conditions of this Code of Conduct meanwhile merely constitute the minimum requirements of our mutual cooperation, but full-fledged contractual requirements for the supplier at the same time.

The Code of Conduct becomes an integral part of all existing and future contracts between us and the supplier without its applicability needing to be further specifically pointed out in the future.

Suppliers are at liberty to set themselves and/or their own suppliers further-reaching codes of conduct. In the process and insofar as their services for us are provided with the help of sub-suppliers, subcontractors or other third parties, suppliers also need to agree the minimum requirements detailed in this document in their relations with these sub-suppliers, subcontractors or third parties, or ensure their fulfilment in other ways. Such consistent conferment of these contractual obligations throughout the supply chain ensures that the underlying human rights, fair working conditions, occupational health and safety, and environmental protection are universally upheld in its entirety.

## Requirements

### 1. General Principles, Legal Compliance

The laws of the respectively applicable legal system are accepted, and their observance is mandatory. Over and beyond this, fair and honest dealings with business partners are the guiding principle of all activities.

### 2. Prohibition of Corruption, Competition and Antitrust Law

Dishonest business practices and corruption of any kind will not be tolerated. Employees observe a strict separation of business and private interests. All conceivable conflicts of interest must be avoided.

The requirements of competition law are binding; agreements on prices or conditions that restrict fair competition are unacceptable.

### 3. Prohibition of Discrimination, and Respect for Human Rights

The observance of internationally recognized human rights is binding. Discrimination of any form, be it based on ethnicity, sexual orientation, age, disability, religion, political beliefs, worldview, or cultural background, will not be tolerated.

Employees are subject to a special duty of care in this regard. Rigorous attention is paid in the company to ensuring that employees are always treated fairly and protected from abuses of any kind, be they of a physical, psychological (mobbing) or sexual nature. No inappropriate behaviour is tolerated in the dealings with one another in this regard.

### 4. Fair Pay

Employees must receive fair and adequate pay. Applicable pay and minimum wage regulations must be observed. This also means that overtime is paid in keeping with the applicable laws/collective agreements.

### 5. Fair Working Hours

Applicable worktime regulations must be complied with. The observance of applicable collective agreements is as mandatory as the consideration of maximum daily and weekly working hours for employees, and an adequate number of rest days.

### 6. Freedom of Association

The employees' right to freedom of association and assembly must be respected along with their right to collective bargaining and wage negotiation, insofar as legally permitted and possible in the country concerned.

### 7. Forced and Child Labour

Forced and child labour are rejected in all their forms. Where the minimum age is concerned, it is mandatory to meet the requirements of conventions 138 and 182 of the international Labour Organization (ILO). If the national legislation is more restrictive, the respective stricter national standards apply as detailed in section 1.

### **8. Conservation of Natural Resources**

People's natural resources must be protected and respected. Under no circumstances may the access to lands, forests or waters that secure livelihoods be denied in violation of legitimate rights. Harmful soil changes, water and air pollution, noise emissions and excessive water consumption must be avoided if they harm people's health, substantially impair natural food production resources, or prevent people from accessing safe drinking water or sanitary facilities.

### **9. Occupational Health and Safety**

Attention is paid to ensuring, within the meaning of the respectively applicable legislations and duty of care for staff over and beyond them, that health risks for employees – of any kind, be they accident – or work-related – are minimized to the greatest possible extent, and excluded wherever possible. A corresponding OHAS management is integrated in the organizational structure for this.

### **10. Data Protection and Confidentiality**

Every natural person's right to informational self-determination is respected. Customers, suppliers, employees and all other business partners can be certain that their personal data will be handled responsibly and only used within the bounds of the applicable data protection regulations.

Internal business information – also of third parties – that is not generally known or has not been published is treated confidentially without fail. The use of such information for private purposes is prohibited.

### **11. Environmental Protection and Energy**

It is clearly apparent that our environment not only needs to be preserved for today's generation, but that future generations will also benefit from a sustainable approach to resources and the environment.

Particular importance is therefore attached to observing the relevant legislation and international standards. Over and beyond this, unnecessary environmental impacts are minimized by corresponding company regulations and by raising employee awareness.

### **12. Conflict Minerals**

Processes complying with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas must be in place for the conflict minerals tin, tungsten, tantalum and gold, as well as other resources such as cobalt. Melting plants and refineries lacking adequate, audited due diligence processes shall be avoided.

### **13. Supply Chain Due Diligence Act (LkSG)**

The LkSG applies to companies based in Germany that employ more than 1,000 people. Suppliers that fall within the scope of the LkSG or similar international regulations must comply with the due diligence obligations contained therein.

Klaus Faber AG does not fall directly within the scope of the LkSG, but feels nevertheless committed to the objectives of the Act. We have therefore implemented systems to identify and address risks to humans and the environment along our supply chains and in our business relationships to prevent human-right-related or environmental risks and, where necessary, to remedy them and minimise risks and injuries. The above principles can only be observed if we are in constant contact with our contractual partners.

All our suppliers are therefore required to comply with the relevant due diligence obligations to protect human rights and the environment, regardless of whether the law applies to such suppliers, and to enforce and ensure compliance by their own suppliers and their suppliers in the supply chain.

Suppliers shall also take appropriate measures to ensure that we can correctly fulfil our obligations to our customers covered by the LkSG with respect to the suppliers and their sub-suppliers. Regardless of whether the LkSG applies directly to our customer, this includes in particular enabling audits of suppliers (also by third parties) and their suppliers, providing information on the results of our own audits of our suppliers, participation in preventive measures, the preparation of risk analyses and the implementation by the supplier of remedial measures.

Should a claim be asserted against us by one or more customers or other third parties arising from activities that fall within the scope of due diligence under the LkSG (or contractual obligations based thereon) and if such circumstances are caused, in whole or in part, by the supplier or its supplier, the supplier shall refund the corresponding costs and damages to us and indemnify us against the respective customer or other third party claim upon first request.

Should the supplier fail to fully comply with its obligations under this Code of Conduct, we reserve the right to terminate the contract without notice after the expiry of a reasonable period. The right to compensation shall remain unaffected.