Code of Conduct on Social Responsibility

0 Foreword

For Bayerische Kabelwerke AG, Bayka Color Farbkonzentrate GmbH, Bayka Berlin GmbH and Berliner Glasfaserkabel GmbH the United Nations Global Compact, the ILO (International Labor Organization), as well as the basic principles listed in other relevant regulations, form the basis of our actions. With this sustainability policy, we commit to upholding and respecting universal human rights and laws and to demanding the same from our own suppliers.

As a manufacturer of cables and wires as well as master batches and compounds we are aware that our economic activities can have an impact on human rights and the environment. Consequently, we are guided in particular by the guiding principles of the automotive industry in order to identify industry-specific risks and achieve an improvement in sustainability in the supply chain. With that in mind, we are continuously developing our existing risk management in order to also respond to human-related and environmental risks.

Within the risk analysis, the relevant topics are methodically considered and evaluated. If necessary, measures are initiated and, if required, escalation measures are taken in order to stop the violation of human rights and environmental law-related obligations appropriately and as far as possible. Furthermore, information on actual or potential violations of rules can be submitted via our whistleblower system.

1 Business Ethics

We commit to comply with the highest standards of integrity and ensure honest and fair practices.

- **Anti-Corruption and Anti-Money Laundering:** We do not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. We do not facilitate or support money laundering. We report any suspicious transactions and be alert for signs of money laundering.

- **Data Protection and Data Security:** We respect the privacy and civil liberties in respect of the collection, retention, use or dissemination, as well as any other processing of personal data.

- **Financial Responsibility/Accurate Records:** We perform our business dealings in a transparent manner and accurately reflect them in the companies' financial reports and filings. We confirm that an adequate financial reporting system control is in place.

- **Disclosure of Information:** We disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices.

- **Conflicts of Interest:** We ensure that our employees avoid and disclose situations where their financial or other interests conflict with job responsibilities, or situations giving any appearance of impropriety.

- **Counterfeit Parts:** We minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.

- **Intellectual Property:** We respect valid intellectual property rights.

- **Export Controls, Trade, and Economic Sanctions:** We comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

- **Grievance Mechanism:** We have established an effective grievance mechanism in line with UN Guiding Principle 31 that allows concerns related to business ethics, human rights, or any other topic to be raised anonymously, confidentially and without retaliation.

- **Remediation:** We provide or cooperate in remediation through legitimate processes when our business activities cause or contribute to adverse environmental or social impacts.

- **Non-retaliation:** We avoid any form of threats, intimidation, and physical or legal attacks against stakeholders, including those exercising their legal rights to freedom of expression, association, peaceful assembly and protest against our business activities.

- **Product integrity:** We observe, consider and comply with the requirements and expectations arising from product integrity throughout the entire product life cycle. These measures also serve to protect against plagiarism.

2 Environment

We commit to implement, and support a proactive approach to environmental responsibility through environmental protection practices, conserving natural resources and reducing overall environmental footprint of production, goods and services throughout their life cycle.

• **Carbon Neutrality:** We strive to set science-based and time-bound emission reduction goals and renewable energy objectives that are aligned with the Paris Agreement, and put in place measures that drive forward the decarbonization of the entire value chain.

• **Water Quality, Consumption & Management:** We minimize water consumption, effectively reuse and recycle water with responsible treatment of wastewater discharges and prevent potential impacts from flooding as a consequence of rainwater run-off, as required by and in accordance with applicable law.

• **Air Quality:** We routinely monitor and disclose, appropriately control, minimize and to the extent possible, eliminate emissions contributing to air pollution, as required by and in accordance with applicable law. We assess cumulative impacts of pollution sources at their facilities and mitigate their pollution levels accordingly.

• **Responsible Chemical Management:** We identify, minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. We are also aware of any use of restricted substances in processes and finished products, and actively investigate suitable substitutes to maintain product and environmental responsibility.

• **Circularity:** We promote closed loop systems by supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.

• **Animal Welfare:** We respect the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare. No animal should be raised and killed for the single purpose of being used in our products.

• **Biodiversity, Land Use and Deforestation:** We protect ecosystems, especially key biodiversity areas, impacted by their operations, and avoid illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity.

• **Soil Quality:** Where appropriate, we monitor and control our impact on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.

• **Noise Emission:** Where appropriate, we monitor and control the levels of industrial noise to avoid noise pollution.

3 Human Rights and Working Conditions

We commit to respect the human rights of workers, local communities and other relevant stakeholders, and prevent and address adverse human rights impacts linked to their business activities, in accordance with the UN Guiding Principles on Business and Human Rights.

• **Child Labor and Young Workers:** We observe the minimum employment age in our business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and ensure that child labor is not tolerated in any form.

• **Wages and Benefits:** We provide our workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration is calculated in such a way that it covers basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages, overtime compensation, medical leave and government-mandated benefits.

• **Working Hours:** We comply with local laws and collective bargaining agreements (where applicable) regarding working hours, or adhere to the ILO Standards on Working Time[1*] in the absence of relevant local regulations.

• **Modern Slavery:** We prohibit any forms of forced, bonded or compulsory labor, including human trafficking.

• **Ethical Recruiting:** We do not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

• **Freedom of Association and Collective Bargaining:** We allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. We respect worker rights to associate freely, to join or not join labor unions, bargain collectively, seek representation and join workers' councils.

• **Non-Discrimination and Harassment:** We do not tolerate any form of discrimination or harassment in respect of employment and occupation and offer equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation,

[1] To the extent a company in the United States does have independent working standards that do not reference ILO standards, such company may comply with ILO in the absence of local laws and collective bargaining agreements.

gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.

• **Women's Rights:** We provide equal opportunity in employment and commit to equal pay for equal work.

• **Diversity, Equity, and Inclusion:** We develop and promote inclusive cultures where diversity is respected, and everyone is able to contribute fully and reach their full potential.

• **Rights of Minorities and Indigenous Peoples:** We respect the rights of local communities to decent living conditions; education, employment, social activities; and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

• **Land Rights and Forced Eviction:** We avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

• **Private or Public Security Forces:** We do not commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

4 Health & Safety

We provide workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health.

• **Workspace:** We provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation.

• **Personal Protective Equipment:** We provide our workforce with necessary Personal Protective Equipment (PPE) and ensure they understand how and when it needs to be applied.

• **Emergency Preparedness:** We reduce the risk of occupational hazards and develop an emergency preparedness and response plan.

• **Incident and Accident Management:** We implement hazard and risk analysis systems to minimize the potential for incidents or accidents at the workplace. An investigation system aims to determine the root cause, and a corrective action system ensures all permanent measures have been taken to minimize the chance of a recurrence.

• **Contractor:** Suppliers should properly manage the health and safety of contractors as part of a company's extended supply chain. Suppliers should coordinate their procurement processes to identify hazards and to assess and control risks arising from the contractor's business activity with the supplier, and the company's business activity that impacts the contractors' workers.

5 Responsible Supply Chain Management

We commit to select business partners that comply with the practices of responsible business conduct and cascade the Guiding Principles along the supply chain.

• **Due Diligence:** We conduct due diligence on our direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, promote transparency and traceability and use their best efforts to implement the ESG standards further along the supply chain, and cascade the Guiding Principles further along the supply chain.

• **Responsible Sourcing of Raw Materials and Minerals:** We responsibly source raw materials and minerals used in our products by developing a management system that promotes supply chain traceability and transparency, and by implementing due diligence measures in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Roth, 04/01/2025

Bayerische Kabelwerke AG
Management