

## Südkabel-Code of Conduct for Corporate Social Responsibility

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### Preamble

Innovations are not conceivable in our society today without the electrical and digital industry (ZVEI) and mechanical and plant engineering (VDMA). Small and medium-sized companies from both sectors are particularly successful at creating products and applications that offer pioneering solutions in areas such as climate protection, the conservation of resources and safe workplaces. They also contribute to societal and economic development around the world. Actions here are consistent with the current legal framework and a basic understanding of responsible and ethical behaviour as formulated in this joint Code of Conduct.

SÜDKABEL affirms its Corporate Sustainability and Corporate Social Responsibility as a part of its global business activities (internationally known as Sustainability management and 'CSR'; CSR = Corporate Social Responsibility).

'SÜDKABEL's Code of Conduct for Corporate Social Responsibility' (hereinafter called 'CoC') acts as a guideline in the industry, especially regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog that is marked by trust.

Developed and agreed to by ZVEI and its member companies (SÜDKABEL et.al.), the content of this CoC is an expression of

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ZVEI's collective core values as they are defined in ZVEI's vision and mission statements and especially as they are affirmed in the social market economy.

It is designed as a self-imposed obligation that can be signed by Südkabel. By providing this CoC, SÜDKABEL assists them in responding to different general conditions in a global market and in facing challenges and social expectations that come from intensified collaboration from within the value chain.

### **1 Basic understanding**

This CoC is based on a shared conception of socially responsible company management as defined by the following guiding principles.

SÜDKABEL accepts responsibility for the consequences of our business decisions and activities in respect of the legal, economic, technical, social and environmental implications as far as possible within the company's available scope of action.

SÜDKABEL thus contributes to the societal and economic development of the countries and regions in which we operate.

SÜDKABEL's actions are consistent with the relevant legal regulations. The company is guided by ethical values and principles, in particular integrity and honesty, as well as respect for the dignity of human beings as set out in the principles of the Universal Declaration of Human Rights of the United Nations, the OECD Guidelines for Multinational Enterprises, the Core Labour Standards of the International Labour Organisation and the United Nations Guiding Principles on Business and Human Rights.

This CoC defines the basic principles of our actions, and SÜDKABEL actively demands that it is observed by the company's employees worldwide. Its standards apply in all branch offices and business units within the company.

SÜDKABEL expects the same basic understanding from its business partners. It is not intended to constitute a basis for third-party rights.

### **2 Compliance with legislation**

It is a matter of course for SÜDKABEL that the company will comply with current laws and other legal requirements in the countries in which the company operates. In cases where local laws and regulations are less restrictive, SÜDKABEL's actions are guided by the principles of this CoC. Where there is a direct conflict between mandatory local law and the principles contained in this CoC, the local laws shall take precedence. Nevertheless, SÜDKABEL endeavours to comply with the content of this CoC.

### **3 Integrity and compliance**

SÜDKABEL has implemented suitable compliance (compliance refers to observance of legal regulations, regulatory standards, voluntary self-imposed commitments and internal guidelines) measures so that the following areas are covered appropriately:

#### **3.1 Corruption**

SÜDKABEL does not tolerate corruption, bribery or blackmail; they impede fair competitive conditions. Gifts made with the intention of influencing business decisions or which could give the appearance of doing so or to obtain some other undue advantage are neither promised, offered, granted, requested nor accepted in our business relationships. Nor does SÜDKABEL allow these to be promised to the company. Especially strict standards must be applied when dealing with people for whom particular rules apply under criminal and liability law (e.g. public officials). SÜDKABEL rejects corruption and bribery as stated in the relevant UN Convention (UN Convention against corruption in 2003, in force since 2005). It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

#### **3.2 Fair competition**

SÜDKABEL operates in compliance with national and international competition and anti-trust legislation and do not participate in price agreements, sharing markets or collusion in respect of customers, markets and bids.

SÜDKABEL pursues clean and recognized business practices and fair competition. In regards to competition, it focuses on professional behaviour and high standards of quality for work. It fosters partnership and trusting inter-action with the

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supervisory authorities. Additionally, it will hold to the parameters of the 'Guide for our Association Activity - Instructions for Compliance with Competition Law in the ZVEI'.

### **3.3 Prevention of money laundering**

Money laundering is the term used for bringing money obtained illegally or from illegally acquired assets into the legal financial and economic system. SÜDKABEL complies with its legal obligations to prevent money laundering and does not participate in transactions that serve to disguise or integrate criminal or illegally acquired assets.

### **3.4 Preventive measures to avoid aiding and abetting tax evasion**

SÜDKABEL is committed to the Criminal Finances Act 2017 of the UK Corporate Criminal Offence (CCO) to take preventive measures to avoid aiding and abetting tax evasion by its own employees or by third parties acting on its behalf.

### **3.5 Protection of information and intellectual property**

SÜDKABEL protects confidential information and respect intellectual property; transfers of technology and know-how must be made in a way that protects intellectual property rights, customer information, business secrets and information that is not in the public domain. SÜDKABEL observes the current laws to protect business secrets and treat its business partners' confidential information accordingly.

### **3.6 Data protection**

SÜDKABEL processes, stores and protects personal data in compliance with statutory regulations. Personal data is therefore treated confidentially and only collected for legal, previously defined purposes in a transparent manner. SÜDKABEL only processes personal data if it is protected against loss, modification and unauthorised use or disclosure using appropriate technical and organisational measures.

### **3.7 Export controls**

SÜDKABEL undertakes to comply with legal standards relevant to export controls - including but not limited to approval requirements, export bans and support bans - in the course of shipping and exporting our goods.

### **3.8 Avoidance of conflicts of interest**

SÜDKABEL avoids internal and external conflicts of interest which could illegitimately influence business relationships. Where this is not successful, SÜDKABEL discloses these conflicts.

## **4 Health and safety**

SÜDKABEL protects its employees' health by taking suitable measures in relation to health and safety at work (e.g. the implementation of a company health and occupational safety management system) that provide appropriate cover in the following areas:

- Compliance with current laws and guidance set out in international standards relating to health and safety at work (see ILO work and social standards (ILO Guidelines on Occupational Safety and Health); SA 8000 Social Accountability or ISO 45001 Occupational Health and Safety Management, etc.)
- Suitable workplace design, safety regulations and provision of suitable personal protective equipment
- Implementation of preventive checks, emergency measures, an accident reporting system and further suitable measures for continuous improvement
- Provision of access to adequate quantities of drinking water and access to clean sanitary facilities for employees.

SÜDKABEL ensures that its employees have received adequate instruction.

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### **5 Remuneration and hours of work**

Remuneration is based on current laws and, if applicable, current binding collective agreements and is supplemented by the relevant national legislation on minimum wages. Employees are given clear, detailed and regular information on the composition of their remuneration. SÜDKABEL complies with current laws and (international) working standards (ILO Convention No. 1 (Hours of Work (Industry) Convention), 1919) in respect of the maximum permissible working hours and ensure that

- working time, including overtime, does not exceed the relevant legally permissible maximum limits
- the hours worked per week, including overtime, do not exceed 60 hours per week, even in exceptional circumstances and even if no such stipulations exist
- employees have at least one full day per calendar week free

### **6 Observance of human rights**

SÜDKABEL does pay attention to and support compliance with internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of each individual
- protect and uphold the right to freedom of speech and freedom of expression
- do not tolerate unacceptable treatment of employees such as physical and psychological hardship, sexual and personal harassment or discrimination

#### **6.1 Prohibition of child labour**

SÜDKABEL does not tolerate any child labour (ILO Convention Nos. 79, 138, 142 and 182). SÜDKABEL does not employ any employees who cannot prove that they are at least 15 years old, and we require proof of age to be submitted. For countries which fall within the exception for developing countries according to ILO Convention No. 138, the minimum age can be reduced to 14 years. We do not hire employees for dangerous work who, according to ILO Convention No. 182, cannot prove that they are at least 18 years old.

#### **6.2 Prohibition of forced labour**

Forced labour, modern slavery or comparable acts that involve the deprivation of liberty are forbidden (ILO Convention Nos. 29 and 105). All work must be voluntary, and it must be possible to end the employment relationship.

SÜDKABEL hereby declares that the company entirely opposes slavery and human trafficking in SÜDKABEL'S business and supply chain operations. SÜDKABEL follows the definitions and concepts of slavery and human trafficking stipulated in the Modern Slavery Act 2015 of the United Kingdom. The company confirms that neither our own business nor the supply chain related to our business involves practices such as enslavement and human trafficking.

#### **6.3 Freedom of association and collective bargaining**

SÜDKABEL respects the right of employees to freedom of association, freedom of assembly and to engage in collective bargaining and pay negotiations (ILO Convention Nos. 87, 135 and 154), providing this is legally permissible and possible in the relevant country in which we are operating. If this is not permissible, the company looks for appropriate compromises for our employees.

#### **6.4 Promotion of diversity, equal opportunities**

SÜDKABEL encourages equal opportunities and does not tolerate discrimination (ILO Convention No. 111). The company treats all people equally regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, worldview or other personal attributes.

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### **6.5 UN Guiding Principles on Business and Human Rights (Ruggie Principles)**

SÜDKABEL supports and follows the UN Guiding Principles on Business and Human Rights. These guiding principles are supported by three pillars, the Ruggie Principles propose that companies, in order to demonstrate and implement respect for human rights, take measures such as:

- Make a public commitment to respect human rights
- Identify, prevent, mitigate, and account for, damage or damage caused to human rights
- Dispose of procedures for remedying the negative consequences on human rights they cause or contribute to causing

### **7 Environment, energy and climate protection**

SÜDKABEL acts in compliance with current legislation and are guided by international standards (ISO 14001 and Standards of OECD Guidelines / COP21) in order to minimise negative impacts on the environment and continuously improve our activities in respect of environment and climate protection.

SÜDKABEL fulfils the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility with natural resources, it holds to the principles from the Rio Declaration (The 27 principles from the 'Rio Declaration on Environment and Development' from 1992 as the result from the UN Conference on Environment and Development (UNCED) in Rio de Janeiro). SÜDKABEL is committed to the goals of the Paris Agreement of 2015 (Paris Agreement) on the occasion of the United Nations Framework Convention on Climate Change (UNFCCC), which provides for the limitation of man-made global warming.

All employees are made aware of environmental issues and the necessary training is offered. SÜDKABEL has implemented appropriate environmental protection measures (e.g. the implementation of a company environmental management system) that cover the following topics appropriately:

- Setting objectives, defining and implementing measures and ensuring the continuous improvement of these;
- Environmental aspects such as the reduction of CO<sub>2</sub> emissions, increasing energy efficiency, using renewable forms of energy, safeguarding the quality of water and reducing water consumption, safeguarding air quality, encouraging resource efficiency, reducing waste and disposing of waste in the proper way and responsibly handling, substances that are dangerous to human beings and the environment.

### **8 Dealing with conflict minerals**

SÜDKABEL exercises the necessary care to take measures to avoid using conflict minerals in our products in order to prevent human rights violations, corruption and financing armed groups or similar via this route. Of the minerals affected, tin (Sn) is used as a soldering material at SÜDKABEL.

SÜDKABEL does not accept the use of conflict minerals and expects its suppliers to source minerals only from socially responsible suppliers. SÜDKABEL expects information from its suppliers about the origin of the affected minerals that are supplied to SÜDKABEL. This policy is consistent with the Dodd-Frank Wall Street Reform and Consumer Protection Act (US H. R. 4173, Sec. 1502).

### **9 Supply chain**

SÜDKABEL expects our suppliers to comply with the principles of this CoC or to apply comparable codes of conduct. Furthermore, the company encourages them to implement the criteria in this CoC in their own supply chains. The company reserves the right to systematically apply this CoC with our suppliers and to carry out checks as warranted. This may take the form of questionnaires, assessments or audits.

Should this cause doubts as to whether this CoC is being followed, the supplier is requested to take suitable measures to counter this and to notify its contact in our company of the course of action. If required, the cooperation arrangement will be ended.

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## **10 Consumer interests**

Where the interests of consumers are affected, SÜDKABEL follows consumer protection provisions and appropriate sales, marketing and information practices. Special attention is paid to groups that require particular protection (e.g. young people or pregnant women).

## **11 Execution and implementation**

SÜDKABEL makes suitable and reasonable efforts to continuously implement, document and apply the principles and values in the CoC. All SÜDKABEL employees are made aware of what this CoC contains and receive training on relevant topics as required. Violations of the CoC are not tolerated and can have consequences under employment law.

### **11.1 Communication**

SÜDKABEL communicates openly in dialogue with employees, customers, suppliers and other interest and stakeholder groups regarding the requirements of this CoC and its implementation. All documents and information are duly created, not unfairly altered or destroyed and properly stored. Company secrets and business information of the partners are treated sensitively and confidentially.

Upon request and within the framework of reciprocity, contractual partners should be informed about the essential measures so that it becomes comprehensible how compliance with them is fundamentally guaranteed. There is no right to the disclosure of trade and business secrets, competition-related information or other information worthy of protection.

### **11.2 Information on infringements**

SÜDKABEL offers its employees and business partners access to a protected mechanism that will allow them to confidentially report possible violations of the principles of this CoC.

If you would like to pass on any information, please contact the following person / office directly or anonymously:

- Compliance Liaison
- [compliance@suedkabel.com](mailto:compliance@suedkabel.com)

## **12 Signing**

Executive Management

Südkabel GmbH, Rhenaniastraße 12-20, D-68199 Mannheim

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<b>Editor:</b> Andreas Weinlein	<b>Prüfer:</b> Andreas Weinlein	<b>Freigeber:</b> Dr. Johannes Kaumanns
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