



CODE OF CONDUCT

Table of contents

Introduction	5	Supply Chains	19
OUR VALUES	7	USE OF CONFLICT MINERALS	20
Compliance	9	RoHS AND REACH COMPLIANCE	20
Our Employees – Our Most Important Value	11	Occupational Safety and Health Protection Policy	21
HUMAN RIGHTS	13	PERSONAL PROTECTIVE EQUIPMENT	23
FORCED LABOUR.	13	WORKPLACES	23
CHILD LABOUR	13	FIRST AID	23
HARASSMENT	13	MACHINE SAFETY	23
COMPENSATION	14	FIRE SAFETY.	24
HOURS OF WORK	14	Sustainable Development Policy	25
NON-DISCRIMINATION	14	NATURAL ENVIRONMENT	27
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING.	14	SOCIAL ENVIRONMENT	28
Fair Play	15	ECONOMICAL ENVIRONMENT	28
PROHIBITION OF CORRUPTION OR BRIBERY.	15		
FAIR MARKET BEHAVIOUR (ANTI-TRUST LAW)	15		
FINANCIAL RECORDS	17		
OPEN AND RESPONSIBLE COMMUNICATION	18		
REPORTING OF MISCONDUCT	18		

Introduction

The CABLEX Group is one of the world's leading system developers and suppliers of wire harnesses, plastic and silicone components, and various mechanical assemblies. At 12 production sites across Europe, Turkey and in China, we are a reliable and responsible business partner for manufacturers of electronic devices for the home appliance, automotive, and other industries.

This Code of Conduct for the Group's employees and business partners provides the foundation for its continuous engagement and dialogue in good faith on its ethical, social and environmental performance. It outlines the Group's expectations in relation to basic compliance with applicable law, respect for labour and human rights, environmental management and anti-corruption. This Code is an integral part of the Group's relationship, and part of all contracts, with its stakeholders.

The CABLEX Group's key PERFECT values are at the very heart of its business. Together they create an environment of entrepreneurial activity guided by ethical principles.

Therefore, the Group requires all its suppliers and business partners to meet its high social, ethical, human rights and environmental standards as a fundamental part of its responsible business approach.

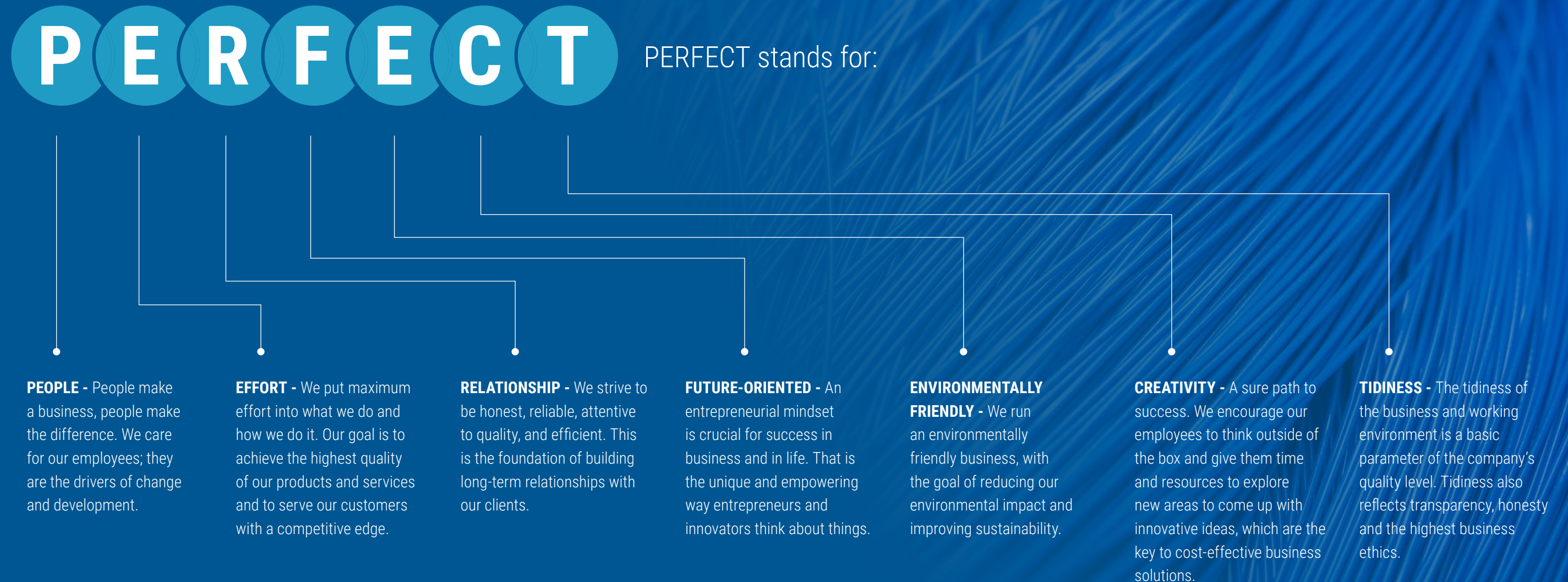
Tržič, 1 September 2021

Boris Debelak
President & CEO



OUR VALUES

The CABLEX Group lives up to its values, which are focused on ensuring sustainable business excellence in all of its business processes, with the aim of providing a strong foundation to achieve the satisfaction of all its stakeholders.



Compliance

The CABLEX Group and all its stakeholders are obliged to comply with the applicable laws and regulations of those countries where they conduct business. Employees, suppliers, customers and other partners are expected to report suspected violations of laws or the Code.

This can relate to any areas of the Code, human rights, labour standards, occupational health and safety, significant environmental incidents or anti-corruption situations.

The CABLEX Group will handle all concerns in accordance with the legislation applicable to the persons involved and prohibits any discrimination or retaliation against individuals who report suspected violations in good faith. The Group is committed to investigating all credible reports made of potential violations of compliance.



Our Employees – Our Most Important Value

The CABLEX Group’s employees are an invaluable source of knowledge and experience and are crucial for its sustainable development. Only employees who feel safe and valued at work can carry out their work with satisfaction and contribute the most. The Group strives to provide conditions that enable its employees to work in a safe, healthy and clean environment. The Group’s goal is to continue to build an environment where creativity, quality of work and individual development play an important role.





HUMAN RIGHTS

The CABLEX Group is committed to treating all employees with dignity and to ensuring respect for their human rights. It is guided by international principles, including non-discrimination, the prohibition of child labour and forced labour, the freedom of association and the right to collective bargaining.

The Group’s approach to human rights is based upon the International Bill of Human Rights, The International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work (ILO Declaration) and the UN Guiding Principles on Business and Human Rights.

The CABLEX Group respects and ensures compliance with applicable laws wherever it operates.

FORCED LABOUR

Any form of forced or involuntary labour or refrain from any practices that could represent risk of involuntary labour are forbidden. No employee may be

obliged to work by the direct or indirect use of force and/or intimidation. Only people who voluntarily make themselves available for work may be employed.

CHILD LABOUR

Child labour of any form is forbidden. The CABLEX Group complies rigorously with all local laws and regulations. Unless local law stipulates a higher age limit, no children of school-age or person younger than 15 (except as provided for by ILO convention No. 138) shall be employed. Workers under the age of 18 shall not perform hazardous work and may be restricted from night work, with consideration given to educational needs.

HARASSMENT

The personal dignity, privacy and personal rights of every individual have to be respected. Employees shall not be subject to corporal punishment or to physical, sexual, psychological or verbal harassment or abuse.

COMPENSATION

The CABLEX Group’s employees receive payment (wages, including overtime payments) and employee benefits on a competitive basis. Wages are essential to meeting employees’ basic needs and the Group will pay at least the minimum wage and the mandated benefits required by applicable laws and regulations.

HOURS OF WORK

Unless national regulations require fewer maximum hours of work and except under extraordinary business circumstances, employees shall not, on a regularly scheduled basis, be required to work a standard working week of more than 48 hours or a total working week of more than 60 hours (including overtime). Employees shall have at least one day off in every seven day period, except in extraordinary business circumstances.

NON-DISCRIMINATION

All employees, regardless of the colour of their skin, race, nationality, social background, possible disability, sexual orientation, political or religious conviction, as well as their gender or age, shall be treated strictly according to their abilities and qualifications in any employment decision, including but not limited to hiring, advancement, compensation, benefits, training, layoffs and termination.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The CABLEX Group and its suppliers are obliged to respect the legal right of employees to associate freely, form or join organisations of their choosing and to bargain collectively in accordance with recognised international instruments, local laws and regulations.

Fair Play

PROHIBITION OF CORRUPTION OR BRIBERY

Every form of corruption or bribery is forbidden. This rule applies to active and passive bribery.

The CABLEX Group never, directly or through intermediaries, offers or promises any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must it accept any such advantage in return for any preferential treatment by a third party. Moreover, the Group refrains from any activities or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof. All those involved should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if they are not a government official, may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.

Any possible attempts are considered a serious breach of employment and are sanctioned.

CONFLICT OF INTEREST

The interests of the CABLEX Group and the private interests of employees – on both sides – are to be kept strictly separate. Decisions and actions are taken independent of considerations which do not concern the business at hand and which involve personal interests.

The CABLEX Group and its business partners ensure that decisions are taken solely on the basis of objective and business consideration.

FAIR MARKET BEHAVIOUR (ANTI-TRUST LAW)

The CABLEX Group and all its business partners agree to respect fair competition and adheres to existing laws that uphold and promote fair competition, in particular prevailing anti-trust laws as well as laws that regulate competition. In dealing with competitors, these provisions in particular prohibit collusion and other activities aimed at influencing prices or conditions, dividing up sales territories or customers, or using prohibitive means to inhibit free and open competition.



HANDLING INFORMATION

The CABLEX Group values and respects its confidential and competitive strategic information while also respecting other parties’ confidential and competitive strategic information.

It is our duty to ensure that all information, whether it represents intellectual property rights, trade secrets, confidential information or personal identifiable information, is processed responsibly and in accordance with the highest safety standards and policies.

It is forbidden to divulge confidential information, as well as confidential documents, to third parties without proper authorisation or to provide other forms of access to them, unless proper authorisation has been granted or it relates to publicly available information.

The CABLEX Group has adopted appropriate safeguards to ensure compliance when engaging with competitors, including in the context of potential acquisitions and mergers, joint-ventures and operational agreements.

The CABLEX Group protects information through the appropriate use of access permits and control, encryption to ensure minimal risk of non-authorised access or disclosure. Any breached confidential information is reported within legal, regulatory and contractual obligations.



FINANCIAL RECORDS

The CABLEX Group’s accounting books and records accurately and fairly reflect its transactions in sufficient detail and in accordance with its accounting practices and policies. The accuracy and completeness of the Group’s disclosures and business records is essential in making informed decisions and to ensure accountability to its funders, regulators and others. The Group ensures that the information recorded is accurate, timely and complete, and is maintained in a manner that is consistent with its internal controls, disclosure controls and legal obligations.

The Group is guided by the principles of transparency and truthfulness. It holds itself and its colleagues responsible for the outcomes of its, and their, choices, behaviour and actions. The Group takes responsibility for all outcomes – positive and negative.

All payments and transactions are authorised, and fully and accurately recorded in the CABLEX Group’s books and records and follow all applicable laws and established accounting policies.

OPEN AND RESPONSIBLE COMMUNICATION

The CABLEX Group continuously builds and maintains relationships with all its stakeholders. It follows the principle of proactivity and two-way communication. The Group provides the media with the desired information in the shortest possible time, thus enabling them to obtain information directly and to be able to inform the interested public in a timely manner with accurate information. The key goal of the company’s communication with the media is to present its activities and build and maintain its reputation, which the company achieves primarily through a correct, stable and long-term dialogue.

In the event of rumours and articles in the media that have not been previously announced and verified, the CABLEX Group does not comment. All relevant information is published regularly and is kept up to date on its website www.cablex-group.com. The Group only comments on rumours or articles in the media when it is judged that the omission of such an act could cause damage, or when it requests the publication of a correction due to incorrect or untrue statements in published articles in the media.

The CABLEX Group must not provide the media with data and documents that have the status or label of business secrets or secrets. This status is regulated by internal acts and regulations.

REPORTING OF MISCONDUCT

The CABLEX Group strives to conduct its business in a responsible way and with the aim of preventing any form of illegal or criminal activity, therefore it seeks to deter and detect unethical or illegal conduct which an individual believes is taking place to ensure

issues are raised at an early stage in a responsible and confidential manner. Examples of such concerns may include, but are not limited to:

- corruption, bribery or blackmail
- fraud
- other criminal offences
- discrimination or harassment
- conflicts of interest
- failure to comply with legal or regulatory obligations
- failure to comply with the CABLEX Group’s policies or procedures
- endangering the health and safety of any individual
- damage to the environment
- attempted concealment of information relating to the above

Should you need to report a concern, you can contact us on integrity@cablex-group.com

Any genuine misconduct concerns raised in good faith will be thoroughly investigated with appropriate actions taken based on the outcome. Feedback will be provided to the person who has raised the concern to the extent that it is appropriate and can be done without violating legal requirements or other duties of confidentiality.

The Group has standard procedures for investigating and managing cases of unethical and illegal conduct which must be followed. Managers or other staff involved in the investigation or management of these cases should contact the Group’s legal representative for more information.

Supply Chains

The CABLEX Group treats its suppliers with fairness, respect and honesty. It expects them to operate sustainably and responsibly towards the people and the environment in which they operate. By promoting sustainable development in the Group's supply chain, it mitigates risks and leverages its purchasing power to drive positive social and environmental outcomes.

The Group selects suppliers in a fair and objective manner. As part of the selection of suppliers, all planned new suppliers, and periodically all important existing suppliers, are included in the assessment with the aim of checking the situation and implementing preventive and corrective measures.

The Supplier Eligibility Assessment Plan is developed by the person responsible for quality management of suppliers based on the criteria described in the internal standard. Evaluation and classification of the supplier's performance on the basis of meeting the contractual requirements for quality and quantity is performed at least once a year. The Group evaluates them as well on the basis of criteria for business quality, environmental management and safety concerns and employee health. Only suppliers who confirm compliance with requirements of standards and legislation are included in the CABLEX Group's list of certified suppliers.



USE OF CONFLICT MINERALS

The CABLEX Group is committed to responsible sourcing. The Group ensures import of these minerals and metals from responsible and conflict-free sources only. Its suppliers are expected to make reasonable efforts to ensure that the parts and products supplied to the CABLEX Group are 'Conflict free'.

The Group expects its suppliers to disclose all information along the supply chain.

RoHS AND REACH COMPLIANCE

The CABLEX Group is committed to managing the use of chemical substances in accordance with governmental regulations, industry standards, and customer-specific requirements in order to protect the environment.

The CABLEX Group's products comply with Directive EU 2015/863 of European Parliament and the council of 4 June 2015 on restrictions of use of certain hazardous substances in electrical and electronic equipment ('RoHS 2' directive), in the member states of European Union.

More information regarding the RoHS (EU 2015/863) and 'RoHS 2' directive can be found on the following link: https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive_en

The Group's products comply also with Article 33 of the European REACH Regulation N1907/2006 on the Registration, Evaluation, Authorisation and Restriction of Chemicals, which entered into force on 1st June 2007 and ECHA (European Chemical Agency) Article 59, which entered into force on 28th October 2008.

More information regarding REACH (EC1907/2006) and SVHCs as established on the ECHA candidate list can be found on the following link: <https://echa.europa.eu/candidate-list-table>

Occupational Safety and Health Protection Policy

The CABLEX Group is committed to providing a safe and secure workplace that supports the health and wellbeing of all its employees and others.

The Group's employees are its most valuable resource. Its approach is designed to assure that employees receive the knowledge they need to ensure a safe work environment. It trains all employees, especially new ones, on how to work to avoid work-related injuries and illnesses. The Group regularly implements internal and external programmes aimed at promoting and maintaining health in the workplace. The Group is continuously improving measures to improve occupational safety and to protect the health of all employees. It provides employees with information, instructions and training, and sets up contingency plans to deal with accidents and emergencies (including the evacuation of the workplace).

The CABLEX Group's business partners must ensure that all applicable occupational health and safety requirements are implemented and in accordance with the law and international standards. They are responsible for operating safely and efficiently and paying attention to conditions or practices in the workplace that could create unnecessary risks for the people or the environment. To avoid potential risks, they must inform the Group immediately of any unsafe conditions and take measures to correct these as soon as possible.

The Group's Ethical, Social and Environment compliance status is regularly monitored by the Workplace Conditions Assessment (WCA) programme. There are 5 assessment areas under the WCA programme including Labour, Health & safety, Wages & hours, Management system and Environment.



PERSONAL PROTECTIVE EQUIPMENT

Dedicated personal protective equipment is defined in the risk assessment, prepared for the Group’s companies by external institutions, i.e. occupational safety bureaus. The use of prescribed personal protective equipment is mandatory and will minimise exposure to hazards that cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, radiological, physical, electrical, mechanical or other workplace hazards. Personal protective equipment includes items such as gloves, safety glasses and shoes, earplugs or muffs, or coveralls, vests and full body suits.

WORKPLACES

The CABLEX Group’s workplaces comply with applicable health and safety standards and are free from recognised hazards that could cause injuries, illnesses or death.

Every workplace has a sufficient floor area, height and unoccupied space for purposes of health, safety and welfare. A minimum and maximum comfortable working temperature for indoor workers is ensured. All workplaces are adequately ventilated. Where air conditioning is provided it is regularly maintained. Lighting sufficiently enables people to work and move safely. If necessary, local lighting is provided at individual workstations and at places of particular risk such as corridors and stairs. Automatic emergency lighting, powered by an independent source, is provided where sudden loss of light would create a risk.

FIRST AID

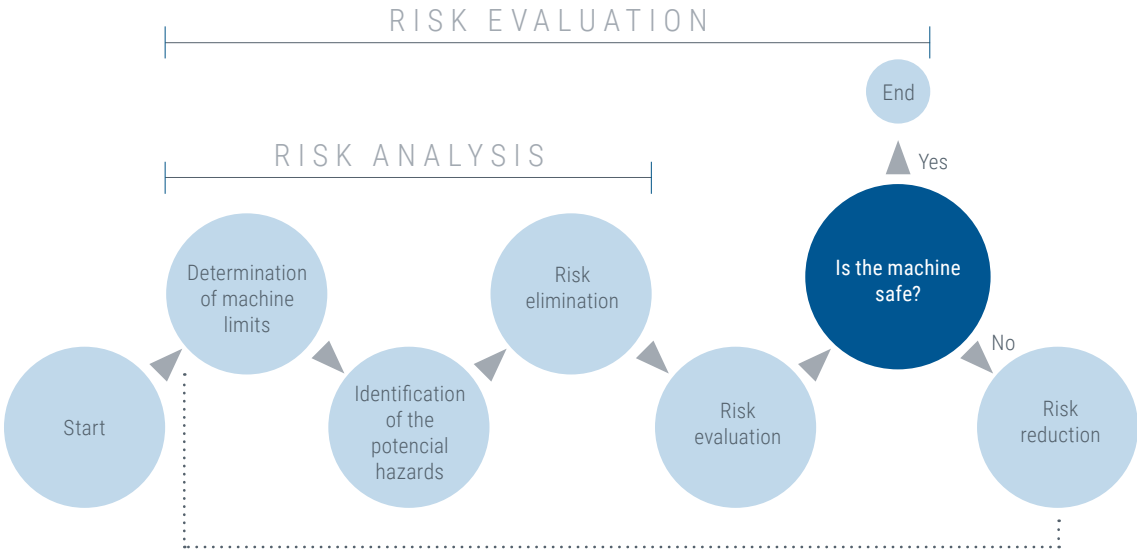
- All workplaces ensure adequate first aid provisions:
- first aid equipment is provided in the workplace
 - each worker in the workplace has access to first aid equipment
 - access to facilities for the administration of first aid are provided
 - an adequate number of workers are trained to provide first aid in the workplace or workers have access to other persons who have been trained to provide first aid

The Group educates its employees about what equipment and facilities are needed to administer first aid in the workplace and informs workers about the available first aid facilities and equipment.

MACHINE SAFETY

The CABLEX Group is obligated by the Use of Work Equipment directive 89/655/EEC, which applies to the provision of all work equipment, including mobile and lifting equipment, in all workplaces and work situations. It requires that all equipment is suitable for use and is inspected and maintained as necessary to ensure that it remains so. Standards and legislation express a distinct hierarchy for controls. The elimination of hazards or reduction of risks to a tolerable level, by inherently safe design measures, is the first priority.

The risk assessment process also covers various risks that exist when using machinery, together with an indication of the seriousness of each. The process of risk assessment is iterative – risks are identified, prioritised, quantified, design steps are taken to reduce them (first by safe design, then by safeguarding), and



then this process is repeated to assess whether the individual risks have been reduced to a tolerable level and that no additional risks have been introduced.

The CABLEX Group uses the Total Productive Maintenance (TPM) method to help it effectively maintain and improve manufacturing machinery, in order to reduce operating costs.. The main contribution of the method is to increase the production of quality products. With the help of the TPM method, the speed of equipment is increased, congestion and ejection are reduced, machine maintenance costs are reduced, and the working environment becomes more orderly and safer.

FIRE SAFETY

The fire safety of the Group’s facilities is based on a fire preparedness plan, which includes ways to prevent fires from occurring, and what to do if a fire does break out. The documented plan defines all emergency procedures and escape routes. Every workplace has clear evacuation procedures in place and regular fire drills are carried out to ensure employees are aware of the procedures.

The workplace is compliant with the latest fire codes and has the required fire protection equipment installed, such as fire extinguishers, fire suppression systems, emergency lighting, and other fire safety equipment. Escape routes inside buildings are properly marked and are not blocked by materials or equipment. Calibrated fire extinguishers are installed in appropriate places. Intervention routes and employee fire assembly points are marked on the exterior of buildings. Employee training on the proper operation of fire safety equipment is provided at least once per year.

The CABLEX Group’s fire protection vendor handles the following for our business:

- fire extinguisher inspection and maintenance
- fire suppression system and sprinkler system inspection and maintenance
- employee fire extinguisher training
- emergency light testing and maintenance
- fire hazard inspections

Sustainable Development Policy

Sustainable development is one of the CABLEX Group's strategic orientations. The company has incorporated the principles of sustainable development into its business, products and services, which take into account economic, social and environmental balance. As a group of companies operating in the global market, the CABLEX Group strives to provide an open corporate culture based on the integration and mutual respect of its employees, customers and suppliers.





NATURAL ENVIRONMENT

The Group is committed to sustainable development and thus to the permanent protection of the natural environment in which it operates. Through continuous and consistent systematic management and compliance with legal and other regulations pertaining to its activities, the Group strives to prevent and minimise any undesirable effects on the environment. It has incorporated its environmental responsibility into all business processes, focusing on those where the environmental impact is the largest. The Group has set up an environmental management system that complies with the international environmental standard ISO14001.

All materials used in production within the CABLEX Group are compliant with the RoHS Directive and REACH Regulation. The materials intended for the automotive industry comply with IMDS and GADSL recommendations.

The activities of the environmental management system, which include the planning, implementation and verification of environmental aspects, and action in the event of inconsistencies, relate primarily to the following elements:

- rational use of materials
- rational use of energy, with the help of energy efficiency analysis of devices and through systematic reduction of energy consumption, thus part of the electricity is produced from renewable sources
- rational use of water
- proper waste and packaging management
- minimisation of consumption of hazardous substances and consequently the formation of hazardous waste
- directing suppliers to meet environmental management requirements and ensuring compliance with international requirements in the field of hazardous or prohibited substances
- reduction of adverse effects on the environment through intensive investments introduction of new technologies that comply with BAT techniques (best available technology)



SOCIAL ENVIRONMENT

The CABLEX Group is involved in the local environment in which it operates, therefore the Group strives to find ways to actively participate and contribute to positive change and a better standard of living for its employees, local communities and society at large. Every year, the Group supports projects in which it believes.

The Group spends most of its sponsorship and donation resources on promoting non-profit activities in the local environment, especially those where its employees are active, either through their own involvement or through the activities of their children. It provides numerous opportunities for free recreation and participation in sports games and events for employees and their family members.

The CABLEX Group cares and is sensitive to the hardships of its employees – colleagues who may be suffering and are in need of help. The Group’s social mission has remained unchanged throughout the years of its existence – to recognise distress and offer help.

ECONOMICAL ENVIRONMENT

The CABLEX Group strives to harmonise its business through responsible conduct in relation to people, society and the environment. It takes its responsibility in relation to global challenges, such as climate change, demographic change and limited availability of primary resources, very seriously.

Management is focused on a sustainable future that is included in the company’s strategy, and is committed to creating an appropriate work environment, supporting innovation and investing in human capital, which have a significant impact on the sustainable future of the organisation and thus further on the company’s financial performance.

By creating quality and sustainable jobs, where the focus is on empowering employees for quality performance of work tasks entrusted to them, the Group is focused on ensuring greater employee engagement, which has an impact on costs, generates higher revenues and better profit. In the long term, this means greater financial performance of the Group.



Cablex Group d.o.o.

Cesta Ste Marie Aux Mines 9
4290 Tržič, Slovenia

www.cablex-group.com