

# Code of Conduct

## **Conducting business in a responsible manner**

At Habia Cable and HEW-KABEL, we pride ourselves on the longstanding relationships we have with our customers, suppliers and employees. These relationships are based on trust – trust that we do business in a responsible manner; ethically, environmentally and socially. This code of conduct outlines how we act on an everyday basis, to continue to earn this trust now and in the future.

**Carl Modigh**  
CEO

## Table of contents

<b>Statement from the CEO</b>	<b>2</b>
<b>Introduction</b>	<b>4</b>
<b>Corporate social responsibility</b>	<b>5</b>
How we act – Employees	5
How we act – Work environment	6
How we act – Social commitment	6
How we act – Environment	6
How we act – Business ethics	7
How we act – Export controls, sanctions, anti-money laundering	7
How we act – Cooperation with suppliers	7
<b>Whistle-blower system</b>	<b>8</b>
<b>Living our responsibilities</b>	<b>9</b>

## Introduction

The Code of Conduct describes how we take responsibility for the impact that our operations and products have on both the environment and society.

This Code is designed to prevent unlawful, unethical, harmful, and irresponsible behaviour within our organisation, and to demonstrate our commitment to conducting our business in accordance with the highest ethical standards, complying with all applicable legislation and regulations. In addition, it empowers us to act to protect the human rights that ensure the dignity, freedom, and equality of individuals.

The Code represents the “Constitution” of the entire company and serves as an internal set of values and guidelines for all employees across all departments worldwide. It defines the ethical-social responsibilities of each person involved in the organisation. The Code plays an essential part of our daily work, due to its role as an indispensable guide for all our activities.

Understanding of and compliance with all provisions of the Code by our employees is essential for ensuring the reliability and excellent reputation of our organisation. This applies not only to our workforce, but also to anyone doing business on behalf of the Company or any of its subsidiaries. We expect our suppliers to familiarise themselves with this Code of Conduct and apply similar guidelines in their own operations. Where legal requirements in specific countries contain stricter provisions, these must also be observed by the respective companies and their employees and contractors within those countries.

We encourage you to make yourself familiar with all details outlined within this Code. Take responsibility and support us in our efforts to create a sustainable and ethical working environment.

# Corporate social responsibility

As a global manufacturer of specialised cables and connectivity solutions, we are aware of our corporate responsibilities - in particular, our responsibilities towards our environment and society. The principles of responsible corporate management, energy and environmental protection, and support for our employees, therefore, form an integral part of our corporate policies.

Our primary objective is to create added value for our customers, investors, employees and business partners. This can include various kinds of benefits, such as improved profitability, competitiveness, efficiency or sustainability for our customers, attractive returns for our investors, and competitive salaries and conditions for our employees.

We aim to create this value without compromising our aspirations concerning quality and sustainable development. Accordingly, environmental responsibility, social responsibility and sound business ethics are core elements of our daily operations and the Company's long-term strategy.

## How we act – Employees

We:

- treat all employees and contractors fairly, with dignity and respect;
- provide equal opportunities for our employees to develop;
- do not discriminate based on gender, religion, age, disability, sexual orientation, political opinion, nationality, ethnic origin, skin colour, physical or mental disability, social background, or any other legally protected characteristics;
- do not tolerate any form of discrimination, harassment, bullying, threats, or intimidation;
- respect the right of all employees to freedom of association;
- do not accept child labour, illegal labour or forced labour and have zero tolerance for all forms of human trafficking, including prostitution and other forms of sex trafficking.

Our principles are based on the processes and guidelines of the United Nations (UN Charter) and the World Health Organization (WHO).

All employees are entitled to fair remuneration for the work they undertake. Any remuneration and benefits paid or provided must meet or exceed the respective national minimum standard.

## How we act – Work environment

We:

- carry out all our activities in a manner compliant with environmental and labour protection laws;
- have a zero-tolerance vision when it comes to workplace accidents. We do not compromise on health and safety in the workplace;
- take a preventive and systematic approach to creating a healthy and safe working environment.

## How we act – Social commitment

Whenever possible, we:

- are actively involved in the communities where we operate, and strive to hire and develop local community members and leaders;
- prioritise the support and sponsorship of organisations that share our values and benefit the communities in which we operate;
- participate in collaborations and projects with schools, universities, institutes and networks.

We only take a stance on current affairs and political topics in line with our values, and when relevant and helpful for us to do so.

## How we act – Environment

We:

- comply with or exceed environmental requirements set by authorities;
- set, measure and review relevant environmental objectives tied to our environmental impact;
- integrate the environmental aspect in decisions affecting our environmental impact, such as investment decisions;
- strive to reduce our CO2 global footprint

## How we act – Business ethics

- We impose demands on honesty and honourability throughout our operations and expect the same of our business partners.
- Bribes are prohibited. All forms of compensation to public agents, suppliers and other business partners must only be for actual goods or services.
- Gifts and other benefits, whether received or given, may comprise an element of conventional hospitality but may not exceed local customs and must be completely in line with local legislation. Parties should not accept or offer gifts, meals, or entertainment if such behaviour could create the impression of improperly influencing the respective business relationship.
- All Group units and employees must observe and comply with competition laws.
- All employees are to avoid conflicts of interest between private financial matters and the company's business activities.
- All business transactions conducted in a Group company must be clearly visible in the company's accounts, which must be managed in accordance with the Group's regulations and in line with international accounting standards. Under any circumstances, should employees engage in inaccurate, false or misleading record keeping, even if one might reasonably believe the consequences of the inaccuracy would be harmless.
- We respect ownership and intellectual property rights.
- Company property may only be used for business purposes unless explicitly permitted, and must be treated with proper care and protected from loss, damage and theft.
- In order to maintain and consolidate our technological leadership, we need to continuously develop our products and services. This includes protecting our technology through patents and other industrial property rights.
- Business and trade secrets must be treated in the strictest confidence. They may only be disclosed to employees as part of performance of their duties.

## How we act – Export controls, sanctions, anti-money laundering

- We comply with all applicable export control laws.
- All companies and subsidiaries of the Company comply with relevant economic sanctions against specific companies and countries, including applicable economic sanctions imposed by the United Nations, the European Union or other jurisdictions.
- We adhere to anti-money laundering, anti-terrorist financing and sanctions laws, and do not do business with criminals, terrorists or sanctioned governments, entities or individuals.

## How we act – Cooperation with suppliers

- We value collaboration with our business partners, including suppliers, subcontractors, partners, agents and distributors.
- We expect our business partners to follow the social, business ethics and environmental principles outlined in our Code of Conduct. We also expect that they apply the same regulations and values to their own business partners.
- We want our business partners to strive toward reducing the impact of their operations, products and services on the environment.
- We encourage our business partners to introduce certified management systems for quality, the environment and work environment.
- We regularly follow up our business partners' performance in terms of sustainable development. If they do not fulfill our requirements, improvement measures must be implemented or the collaboration is terminated.
- We undertake review procedures to determine with reasonable certainty that so-called conflict minerals are not sourced from areas of armed conflict.

- We are committed to ensuring the authenticity and integrity of our products, incoming goods and services. We continuously monitor for counterfeit and fraudulent trade articles. In the event that any suspicious arise we take immediate and proactive action to stop the circulation of such goods and services. Furthermore, we require our suppliers to implement countermeasures, processes and action to address any potential occurrences of this nature.

## Whistle-blower system

Our whistle-blower system is open to employees, customers, suppliers and other stakeholders for the reporting of possible violations of this code of conduct by the company or its employees. Information can be reported anonymously at all hours. All communication is treated confidentially and no disadvantage or consequences for people who make a report will be tolerated.

The whistle-blower system is available for submitting reports. The platform is available in various languages (including Swedish, English, German and Chinese):

[https://habia.whistlesystem.com/login/M\\_hwjhET\\_X2882\\_UmCo](https://habia.whistlesystem.com/login/M_hwjhET_X2882_UmCo)

A separate whistle-blower system is available for reports concerning Habia Sp. z o. o. in Poland:

<https://habia.whistlesystem.com/login/991QA84j9OD3FQQxe4P>

# Living our responsibilities

This Code of Conduct provides detailed information on several subject areas. Employees will be assisted to understand, internalise and act in accordance with the Code by attending training sessions.

Management teams at the Company are expected to make the content of the Code of Conduct known in their area of responsibility, ensure compliance with it, and lead by example according to our values. If you have any questions, suggestions or comments, please feel free to contact us at any time via [coc@habia.com](mailto:coc@habia.com) (for Habia Cable) or [coc@hew-kabel.com](mailto:coc@hew-kabel.com) (for HEW-KABEL).

It is your responsibility to report any possible misconduct if you suspect that the Code of Conduct has been violated. All reports of potential violations are followed up and sanctions are applied where violations have been determined to have occurred.

## **The following key questions may help you make decisions and act with integrity:**

- Am I acting in the interests of the company?
- Does my behaviour correspond with the values of the company?
- Am I adhering to the Code of Conduct, even in the event of resistance or difficulties?
- Does my behaviour positively promote the reputation of the company?
- Am I a positive role model for others?
- Does my behaviour reflect my good conscience?
- Would my behaviour pass third-party verification?

If you can answer all these questions with “YES”, you are acting with integrity and responsibility.

**REMEMBER:** Always refer to the Code to make the right decisions. Use good judgment to uphold the highest ethical standards and protect our company. Seek help if you have questions. If you are unsure of what choice to make, ask yourself:

- Does it follow our policies?
- Does it comply with the law?
- Will it help us maintain the trust people place in the company?
- Would you feel comfortable if it were on the news or made public?

If you answered “NO” to any of these questions, or if you are unsure - **pause, re-evaluate and ask for help.**

For more guidance that may help you decide on the appropriate actions to take, read the Code of Conduct Questions and Answers (Q&A) document.

