



# SUPPLIER CODE OF CONDUCT

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## ○ INTRODUCTION

TT Cables' suppliers are crucial to our success as a cable manufacturer dealing with customers all over the world. The TT Cables Supplier Code of Conduct (the "Code") is a critical instrument that outlines the guidelines, expectations, and policies for the supplier's doing business with us, including helping achieve sustainability goals. The Code applies to all our suppliers on our Key Supplier List and who are in focus of this Code considering contextual issues. TT Cables reserves the right to modify, revise, or alter this Code, at its sole discretion, at any time and any such alterations or changes will be published on our website: [ttcables.com](http://ttcables.com).

TT Cables' core values of safety and health, respect for people, highest ethical behavior, and protecting the planet, are the cornerstone of what we stand for as a company. Our core values exemplify the way we work, and are the foundation to everything we do including our commitments to sustainability, community impact, equity and responsible governance.

The following sections of this document outline our expectations from our suppliers regarding core values, sustainability, and other requirements for doing business with TT Cables.

Sustainability plays a key role in all we do as a company, and this extends to our supply chain. Our suppliers play a critical role in helping us advance our sustainability goals. In light of this, we work closely with our suppliers and encourage them to adopt best practices in sustainability within their work environment and operations, including their supply chain.

TT Cables' sustainability standards are based on the ten principles of the United Nations Sustainable Development Goals, the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization, and the Declaration on Fundamental Principles and Rights at Work.

Suppliers' compliance with the Code is a condition of doing business with TT Cables. We reserve the right to conduct audits or assessments on suppliers to confirm compliance, and where warranted, we will take the appropriate steps regarding our relationship with a supplier. TT Cables will perform standardized screening of suppliers on a regular basis. These steps may include immediate discontinuation of the relationship for non-adherence to international principles, failure to correct violations, or ongoing non-compliance with this Code.

## ○ PEOPLE

At TT Cables, we do all we can do to facilitate our people in achieving goals through continuous development – from our strong family of employees, suppliers, customers straight through to other relevant stakeholders. In this manner, we can all grow together and thereby expect the same from our suppliers.

### Human Rights

At TT Cables, we are committed to the protection and advancement of human rights wherever we operate. The use of child or forced labor, slavery, or human trafficking in any of our global operations or facilities, including those operated by suppliers, is not tolerated in any form. Should we learn of violations to these principles, we may, at our discretion, discontinue the business relationship. Learn more on our Human Rights Policies on our website: [ttcables.com](http://ttcables.com) Our Policies

#### Prevention of Child and Forced Labor & Fair Treatment

Our suppliers are required to comply with the following with respect to their own operations and supply chains:

##### (a) Prohibition of Child Labor:

- TT Cables will not tolerate the use of child labor in any part of its supply chain. TT Cables defines a “child” as anyone who is less than 15 years of age. Notwithstanding any national law or local regulation that permits a worker to be less than 15 years of age, for purposes of these principles, TT Cables defines such a person as a “child.”
- At sites and in locations where a national or local law or regulation provides for a minimum employment age greater than 15 years or imposes additional restrictions in activities such as hazardous work, such laws and regulations must be observed.
- Persons under the age of 18 are minors and therefore in need of protection. They shall not perform work which, due to its nature or the circumstances in which it is performed, would endanger their safety, health, or morals, i.e., overtime or night shifts. TT Cables defines a “young person” anyone between 15 years of age and 18 years of age. Any young person employment should be performed under the following guidelines:

- o employment is a temporary internship, apprenticeship, or is a seasonal common and customary practice in the industry;
- o The employment does not interfere with schooling;
- o The young person is working with the permission of their parent or legal guardian which must be confirmed by written consent;
- o The employment does not violate any relevant labor law or regulation;
- o The employment will be directly supervised;
- o The young person’s safety, health and education will be a primary concern;
- o No hazardous work is allowed.

In determining work that is unsuitably dangerous for persons under the age of 18, consideration should be given to:

- o Work involving high-risk activities, including: working at heights; working in confined spaces; high pressure water cleaning; hazardous line equipment openings; working underground or underwater; work with potential for electrical shock; work tasks involving open flames or potential to produce heat or sparks; working with or operating dangerous machinery, equipment and tools; or the manual handling or transporting of heavy loads;
- o Work in an unhealthy environment which may, for example, expose them to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health;
- o Work under particularly difficult conditions, such as work for long hours or during the night or work where they are unreasonably confined to the premises of the employer.

(b) Prohibition of Forced Labor:

TT Cables will not tolerate the use of forced labor in any part of its supply chain. We define forced labor as:

- o Any labor or service required of a person under threat of punishment or for which they have not volunteered;
- o All forms of slavery, slave-like practices (i.e., demanding excessive fees and withholding documents), servitude, or other forms of domination or oppression (i.e., debt bondage and use of force).

For further information on this issue, visit: [ttcables.com](http://ttcables.com) Our Policies  
Anti-Slavery and Human Trafficking Policy.

## Diversity, Equity & Inclusion

TT Cables is committed to the elimination of inequality, racism, and all other forms of discrimination. We carefully consider how our business efforts can make a positive and lasting impact in our industries and our communities.

TT Cables' approach requires that our businesses include and support high-performing, small and diverse suppliers in their supply chains as a component of our global commitment. We particularly encourage local SMEs in areas we work in order to strengthen the local economy and help them develop sustainability strategies.

We expect our suppliers to reject any form of discrimination, such as those related to race, religious beliefs or other forms of discrimination and to be symmetrically committed to providing equal opportunities and treatment to all employees. We strongly encourage our suppliers to expand their efforts in this area by engaging with micro, small and medium size businesses, women-owned businesses, and other diverse organizations.

## **Freedom of Association**

Suppliers must regard the right of all workers to form and join trade unions, to bargain collectively, as well as respect the right of workers to refrain from such activities. Suppliers must not interfere with the establishment, function, or administration of workers' organizations and respect local regulations in regards to peaceful assembly. Suppliers shall not discriminate, harass, intimidate, or retaliate against workers for being members of a union or participating in trade union activities, and provide worker representatives with access to their workplace.

## **Working hours and Wages**

Suppliers must not require workers to exceed the maximum working hours set by local law. Workers must be allowed at least one day off every seven days. Suppliers must pay compensation to workers for the work completed in compliance with local laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers must provide workers with sufficiently informative and accurate wage statements. Suppliers must strive to provide their employees' wages equivalent to or above the "Living Wage" according to country data published on [wageindicator.com](http://wageindicator.com) or an equivalent database.

## ○ HEALTH AND SAFETY

We expect of our suppliers to apply the same standards as TT Cables in doing business including protect the health and safety of employees, customers and communities, adhere to all applicable regulatory frameworks as well as the use of best practices in running their business through integrated quality management systems.

We expect our suppliers to include these aspects in their safety and health programs:

- **Health, Safety, Environmental and Quality Regulations** Suppliers must comply with all applicable health, safety, environmental and quality regulations. All required permits, licenses, and registrations must be obtained, followed, and kept up to date.
- **Occupational Health and Safety Suppliers** are expected to protect their employees from hazards, including chemical, biological, electrical, and physical. Adequate lighting, temperature, sanitation, ventilation, and potable drinking water must be presented in a safe and healthy workplace.
- **Process Safety** OH&S training on hazards, procedures, and use of proper protective equipment is essential for the safety and health of all employees. In accordance with applicable standards, suppliers must have effective safety programs in place for managing and maintaining all their processes.
- **Quality and Product Safety** Suppliers will consistently provide TT Cables with high-quality products and services that meet all applicable quality and safety standards for their intended use. Suppliers must demonstrate that they have effective quality management systems. Safety data sheets must be made available for all hazardous substances. Concerns about product safety must immediately be reported to TT Cables.
- **QMS and Quality Programs for Direct Suppliers:** Suppliers of raw materials, packaging, or contract manufacturing services are required to implement QMS and quality programs at their manufacturing and distribution sites. The QMS and quality programs must conform with the quality requirements of TT Cables. Suppliers may be required to obtain certification of its QMS to ISO 9001 by an independent third-party certification body. Upon request, a supplier will be required to complete an assessment of its QMS or quality programs. Suppliers must provide notice to TT Cables and seek its prior written consent to any proposed change in raw materials, manufacturing processes, material packaging, test methods, or location of manufacture in advance of proposed implementation.

## ○ ETHICS & GOVERNANCE

TT Cables Group continually works on improving our Corporate Governance Framework in order to reduce risks at all levels over all operations. This system of controls, transparency, risk-assessment and monitoring assures long-term business continuity and success to all stakeholders.

TT Cables strives to align with the highest ethical standards and perform in compliance with all applicable laws. We work diligently to be a respected corporate citizen and expect the same from our suppliers.

- **Business Integrity & Fair Competition** Suppliers must act with the highest integrity and transparency in accordance with all relevant anti-bribery and anti-corruption laws and regulations, applicable anti-trust laws as well as any other applicable local laws. Suppliers must never engage in any form of bribery to secure business on behalf of TT Cables or any other company. Our Anti-Corruption Policy can be found at [ttcables.com](http://ttcables.com) Our Policies

- **Intellectual Property and Confidential Information Protection** of our intellectual property is of the utmost importance to our company. Suppliers will implement measures to protect all intellectual property provided during the course of our business transactions. Information should be treated as confidential and only be provided to supplier's employees for doing business with TT Cables.

- **Conflict Minerals** We are committed to the responsible sourcing of minerals worldwide. We take this role seriously throughout our supply chain including ensuring that the minerals used in our products, such as tin, tungsten, tantalum, and gold ("3TG," or more broadly, "Conflict Minerals") meet relevant legal compliance mandates on use and sourcing. We expect our suppliers to adhere to our Conflict Minerals Policy (available at request), and a due diligence screening for suppliers which fall in this category will be performed in accordance with international standards.

- **Gifts** We do not encourage giving or receiving gifts. In rare cases when gifts or entertainment are provided, they need to be consistent with customary regional business practices, have a clear business purpose, cannot be perceived as a bribe or improper payment, are not offered to influence a business relationship improperly, do not violate applicable laws or ethical standards and would not embarrass the supplier or TT Cables if publicly disclosed.

- **Export Controls, Trade, and Economic Sanctions Suppliers** shall 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.

- o **Legal Requirements** Suppliers must comply with all applicable laws, regulations, contractual agreements, and generally recognized standards related to operations, products, and services.
- o **Commitment, Accountability and Risk Management** Suppliers must identify and manage risks in all areas addressed. Suppliers are required to keep adequate records with respect to their direct suppliers and actively engage to increase transparency and traceability.
- o **Non-Compliance** TT Cables reserve the right to verify compliance with this Code. If non-compliance is discovered, the supplier must take corrective action. If the supplier fails to remedy an act of non-compliance in a timely manner, we may suspend purchases, refuse delivery, and return any goods or services from the supplier, at our discretion, and without further obligation.
- o **Cybersecurity and Information Security** Suppliers must take reasonable measures to secure any data or information provided by TT Cables, including, but not limited to, data related to the products or services being supplied TT Cables. This includes implementing adequate physical, administrative, and cybersecurity controls to prevent unauthorized access, disclosure, alteration, interruptions, or destruction of data. A supplier must also promptly report any unauthorized access or suspected breach of security to TT Cables. We recommend ISO 27001 Certification to all suppliers.



## ○ SAFEKEEPING MOTHER EARTH

TT Cables Group is wholly committed to protecting all aspects of our environment, playing our role in leaving a better future for generations to come. We expect our suppliers to work on reducing GHG emissions, manage water responsibly, rationally use energy and other resources and take continual steps to reduce waste.

○ **Greenhouse Gases** TT Cables continually works on reducing our GHG emissions and setting reduction targets in accordance with global goals. We strive to procure power from renewable sources while committing. We will procure our electricity from more renewable sources and expand our work on energy efficiency projects. Suppliers will measure and continuously improve their environmental performance across all their operations, products, and services. Suppliers are encouraged to publish annual non-financial reports (ESG) in accordance with internationally accepted reporting standards such as GRI or ESRs.

○ **Water management and biodiversity** Recognizing the importance of proper management of these key resources, we expect our suppliers to measure and report their water consumption, reduce waste, and ensure responsible handling of water. We also expect our suppliers to protect our natural ecosystems and avoid deforestation.

○ **Circular economy** Suppliers should support the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling. Suppliers should strive to find new, innovative solutions to recycle waste stemming from their production process as well as undertake research in developing environmentally friendly products.