

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

REVISION: 01

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## 1. STATEMENT

The TT Cables Group (hereinafter: GTTK) is committed to conducting its business in a fair, ethical, honest, and lawful manner, including promoting ethical and lawful labor practices both within its own workforce and, where applicable, throughout its various supply chains among numerous business partners.

The TT Cables Group prohibits human trafficking and forced labor within its own organization and encourages its business partners to attach equal importance to prohibiting such activities in order to prevent abuses, protect human rights, and ensure compliance with international principles.

The TT Cables Group also maintains GPOL16 – Conflict Minerals Policy (Conflict Minerals Compliance Procedure) to ensure that all minerals used in our products are responsibly sourced and compliant with applicable regulations.

This Policy applies to GTTK and all its affiliated companies worldwide.

## 2. PROHIBITED ACTIVITIES

All employees and applicable business partners who supply goods or provide services to GTTK are strictly prohibited from engaging in the following activities:

- Participation in human trafficking;
- Procurement of commercial sex acts;
- Use of forced labor in the performance of work for GTTK;
- Destroying, concealing, confiscating, or otherwise denying an employee access to their identity or immigration documents, such as passports or driver's licenses, regardless of the issuing authority;
- Using deceptive or fraudulent recruitment or employment practices, such as failing to disclose—in a form and language accessible to the worker—basic information (or providing materially false information) during recruitment regarding key terms and conditions of employment, including but not limited to:
  - wages and additional benefits;
  - work location;
  - living conditions, accommodation, and related costs (if provided or arranged by the employer or agent);
  - any significant fees charged to the employee;
  - where applicable, the hazardous nature of the work;
  - using recruiters who do not comply with the local labor laws of the country in which recruitment takes place;
- Charging recruitment fees to employees;

- Providing or arranging accommodation that does not meet the accommodation and safety standards of the host country;
- Failing to provide employment contracts, work agreements, or other mandatory employment documents in a timely manner, in written form, and in a language the employee understands, where required by applicable laws and regulations;
- Failure to comply with requirements for responsible sourcing of minerals from conflict-affected areas and related regulations, including due diligence and reporting, in accordance with the GTTK Conflict Minerals Compliance Procedure. For relevant suppliers, the Procurement and Logistics Department shall regularly obtain CMRT and EMRT forms.

### **3. OBLIGATION TO COOPERATE**

The TT Cables Group has an obligation to cooperate with the United Nations and other conventions and regulations against slavery and human trafficking and expects its employees and business partners to assist the company in fulfilling this obligation. This includes timely and complete responses to requests for information and documentation, as well as allowing reasonable access to facilities and personnel so that GTTK, or any other competent public authority, may conduct audits, investigations, or other activities to determine compliance with the above conventions and regulations or any other applicable laws and regulations governing prohibitions on human trafficking, procurement of commercial sex acts, or the use of forced labor. Partner compliance will be verified through GTTK audit procedures.

### **4. VIOLATIONS AND DISCIPLINARY MEASURES**

The TT Cables Group takes the enforcement of this Policy seriously. Any employee found to be in violation of this Policy will be subject to disciplinary measures in accordance with GTTK internal regulations.

### **5. COMPLIANCE RESOURCES AND REPORTING CHANNELS**

Employees must immediately report to GTTK any information obtained from any source indicating a violation of this Policy by a GTTK employee or any business partner.

Employees should report suspected violations and are encouraged to ask questions related to this Policy by contacting the Human Resources Department.

### **6. MONITORING, REPORTING AND CONTINUOUS IMPROVEMENT**

The Compliance Department shall conduct audits on an annual basis in cooperation with relevant organizational units and, based on key performance indicators, report to top management.

## **7. COMPLIANCE WITH REGULATIONS**

- ILO Conventions
- UN Guiding Principles on Business and Human Rights (UNGPs)
- Applicable national laws