

# SUPPLIER CODE OF CONDUCT

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## 1. INTRODUCTION

Suppliers of the TT Cables Group (hereinafter: GTTK) are essential to our success as a cable manufacturer operating with customers worldwide. The GTTK Supplier Code of Conduct is a key instrument that sets out guidelines, expectations, and policies for suppliers doing business with us, including support in achieving sustainability goals.

This Code applies to all suppliers included on our list of key suppliers who are within the scope of this Code in view of contextual issues. The TT Cables Group reserves the right to amend, revise, or supplement this Code at its discretion at any time, and any such amendments or supplements will be published on our website: **ttcables.com**.

GTTK's core values—health and safety, respect for people, the highest ethical standards, and protection of the planet—are the cornerstone of who we are as a company. These core values reflect how we work and form the foundation of everything we do, including our commitments to sustainability, community impact, equality, and responsible governance.

The following sections of this document describe our expectations of suppliers regarding core values, sustainability, and other requirements for doing business with GTTK. Sustainability plays a key role in everything 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. Accordingly, we work closely with our suppliers and encourage them to adopt best sustainability practices within their workplaces and operations, including their own supply chains.

GTTK sustainability standards are based on the ten principles of the United Nations Sustainable Development Goals, the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO), and the Declaration on Fundamental Principles and Rights at Work.

Supplier compliance with this Code is a condition of doing business with GTTK. We reserve the right to conduct supplier audits or assessments to verify compliance and, where justified, to take appropriate action regarding our relationship with a supplier. The TT Cables Group will regularly carry out standardized supplier screenings. These actions may include immediate termination of the relationship due to non-compliance with international principles, failure to remediate violations, or persistent non-compliance with this Code.

## 2. PEOPLE

At GTTK, we do everything we can to enable our people to achieve their goals through continuous development—from our strong family of employees, suppliers, and customers to other relevant stakeholders. In this way, we can all grow together, and we expect the same from our suppliers.

### 2.1 Human Rights

GTTK is committed to protecting and promoting human rights wherever we operate. The use of child labor or forced labor, slavery, or human trafficking in any part of our global operations or facilities, including those operated by suppliers, is not tolerated under any circumstances. If we become aware of violations of these principles, we may, at our discretion, terminate the business relationship.

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More information on our human rights policies is available on our website: **ttcables.com – Our Policies**.

## **2.2 Prevention of Child and Forced Labor and Fair Treatment**

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

Suppliers must adhere to the following principles in their own operations and supply chains:

- The TT Cables Group does not tolerate the use of child labor in any part of its supply chain. GTTK defines a “child” as any person under the age of 15. Regardless of any national law or local regulation that permits employment below the age of 15, for the purposes of these principles GTTK considers such a person to be a “child.”
- Where national or local laws or regulations stipulate a higher minimum working age or impose additional restrictions on activities such as hazardous work, such laws and regulations must be respected.
- Persons under the age of 18 are considered minors and therefore require special protection. They must not perform work that, by its nature or the circumstances in which it is carried out, could jeopardize their safety, health, or morals, including overtime or night work. GTTK defines a “young person” as anyone between 15 and 18 years of age. Employment of young persons must comply with the following guidelines:
  - employment is temporary training, apprenticeship, internship, or seasonal work customary in the industry;
  - employment does not interfere with schooling;
  - the young person works with the permission of a parent or legal guardian, confirmed by written consent;
  - employment does not violate applicable labor laws or regulations;
  - employment is directly supervised;
  - the safety, health, and education of the young person are the primary concern;
  - hazardous work is not permitted.

In determining work that is inappropriately hazardous for persons under 18, the following must be considered:

- Work involving high-risk activities, including work at height; confined spaces; high-pressure cleaning; hazardous equipment line openings; underground or underwater work; work with potential electrical hazards; tasks involving open flames or potential heat or sparks; working with or operating hazardous machinery, equipment, or tools; or manual handling of heavy loads.
- Work in unhealthy environments that may expose minors to hazardous substances, agents, or processes, or to temperatures, noise levels, or vibrations harmful to their health.

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- Work under particularly difficult conditions, such as excessively long hours, night work, or work where workers are unreasonably confined to the employer’s premises.

## **(b) Prohibition of Forced Labor**

The TT Cables Group does not tolerate forced labor in any part of its supply chain. Forced labor is defined as:

- any work or service exacted from a person under threat of penalty and not voluntarily undertaken;
- all forms of slavery or practices similar to slavery (e.g., excessive recruitment fees, retention of documents), servitude, or other forms of domination or oppression (e.g., debt bondage, use of force).

For more information, please visit: [ttcables.com](http://ttcables.com) – **Our Policies – Anti-Slavery and Human Trafficking Policy**.

## **2.3 Diversity, Equality, and Inclusion**

The TT Cables Group is committed to eliminating inequality, racism, and all forms of discrimination. We carefully consider how our business efforts can have a positive and lasting impact on our industries and communities. GTTK’s approach requires our companies to include and support high-performing, small, and diverse suppliers in our supply chains as part of our global commitment.

We particularly encourage local SMEs in the regions where we operate to strengthen local economies and help them develop sustainability strategies. We expect our suppliers to reject any form of discrimination, including discrimination based on race, religion, or other characteristics, and to be equally committed to ensuring equal opportunity and fair treatment for all employees. We strongly encourage suppliers to extend these efforts by including micro, small, and medium-sized enterprises, women-owned businesses, and other diverse organizations.

## **2.4 Freedom of Association**

Suppliers must respect the right of all workers to form and join trade unions, to bargain collectively, and to refrain from such activities if they choose. Suppliers must not interfere with the establishment, operation, or administration of worker organizations and must respect local regulations regarding peaceful assembly. Suppliers must not discriminate against, harass, intimidate, or retaliate against workers due to union membership or participation in union activities and must allow worker representatives access to the workplace.

## **2.5 Working Hours and Wages**

Suppliers must not require workers to exceed the maximum working hours permitted by local law. Workers must be granted at least one day off in every seven-day period. Suppliers must compensate workers in accordance with local laws, including those governing minimum wages, overtime, and statutory benefits. Suppliers must provide workers with sufficient, accurate, and transparent wage statements. Suppliers should endeavor to pay wages equal to or higher than the “Living Wage Minimum” as published on [wageindicator.com](http://wageindicator.com) or an equivalent database.

### 3. HEALTH AND SAFETY

We expect our suppliers to apply the same standards as GTTK in their operations, including the protection of the health and safety of employees, customers, and communities, compliance with all applicable regulatory frameworks, and the use of best practices through integrated quality management systems.

Suppliers are expected to include the following elements in their health and safety programs:

- **Health, Safety, Environment, and Quality Regulations:** Suppliers must comply with all applicable health, safety, environmental, and quality regulations. All required permits, licenses, and registrations must be obtained, maintained, and renewed.
- **Occupational Safety:** Suppliers must protect their employees from hazards, including chemical, biological, electrical, and physical hazards. Adequate lighting, temperature control, sanitation, ventilation, and access to potable water must be provided in a safe and healthy workplace.
- **Process Safety:** Occupational safety training covering risks, procedures, and the use of appropriate personal protective equipment is essential. Suppliers must have effective safety programs to manage and maintain all processes in line with applicable standards.
- **Product Quality and Safety:** Suppliers must consistently provide GTTK with high-quality products and services that meet all applicable quality and safety standards for their intended use. Suppliers must demonstrate effective quality management systems. Safety data sheets must be available for all hazardous substances. Any product safety concerns must be reported to GTTK immediately.
- **QMS and Quality Programs for Direct Suppliers:** Suppliers of raw materials, packaging, or contract manufacturing services must operate quality management systems and quality programs at their production and distribution sites that meet GTTK quality requirements. Suppliers may be required to obtain ISO 9001 certification by an independent certification body. Upon request, suppliers must complete assessments of their QMS or quality programs. Suppliers must notify GTTK and obtain prior written approval for any planned changes to raw materials, production processes, packaging materials, testing methods, or manufacturing locations before implementation.

### 4. ETHICS AND GOVERNANCE

The TT Cables Group continuously works to improve its corporate governance framework to reduce risks at all levels across all operations. This system of controls, transparency, risk assessment, and oversight ensures long-term business continuity and success for all stakeholders.

GTTK strives to comply with the highest ethical standards and to operate in accordance with all applicable laws. We work diligently to be a responsible corporate citizen and expect the same from our suppliers.

- **Business Integrity and Fair Competition:** Suppliers must act with the highest integrity and transparency and comply with all applicable anti-bribery and anti-corruption laws, competition laws, and other relevant regulations. Suppliers must never engage in bribery to secure business for GTTK or any other company. Our Anti-Corruption Policy is available at [ttcables.com](http://ttcables.com) – **Our Policies**.
- **Intellectual Property and Confidential Information:** Protection of intellectual property is of utmost importance. Suppliers must implement measures to safeguard all intellectual property rights provided during the business relationship. Information must be treated as confidential and disclosed only to supplier employees for the purpose of conducting business with GTTK.
- **Conflict Minerals:** We are committed to responsible mineral sourcing worldwide. We expect suppliers to comply with our Conflict Minerals Policy (available upon request). Due diligence will be conducted for suppliers in this category in accordance with international standards.
- **Gifts:** Giving or receiving gifts is not encouraged. Where gifts or hospitality are provided, they must be customary, have a clear business purpose, not be perceived as bribes, not improperly influence business decisions, comply with applicable laws and ethical standards, and not cause embarrassment if publicly disclosed.
- **Export Controls, Trade, and Sanctions:** Suppliers must comply with applicable export and re-export controls and trade restrictions relating to certain countries, regions, entities, or individuals.
- **Legal Requirements:** Suppliers must comply with all applicable laws, regulations, contractual obligations, and generally recognized standards relating to their operations, products, and services.
- **Commitment, Accountability, and Risk Management:** Suppliers must identify and manage risks in all areas covered by this Code, maintain appropriate records of their direct suppliers, and actively contribute to increased transparency and traceability.
- **Non-Compliance:** GTTK reserves the right to verify compliance with this Code. In cases of non-compliance, suppliers must implement corrective actions. Failure to remedy non-compliance within a reasonable timeframe may result in suspension of purchases, rejection and return of goods or services, or termination of the relationship, at GTTK's discretion.
- **Cybersecurity and Information Security:** Suppliers must take reasonable measures to protect all data and information provided by GTTK, including implementing physical, administrative, and cybersecurity controls to prevent unauthorized access, disclosure, alteration, disruption, or destruction. Any suspected or actual security breach must be reported to GTTK immediately. ISO 27001 certification is recommended for all suppliers.

## 5. PROTECTING MOTHER EARTH

The TT Cables Group is fully committed to protecting all aspects of the environment and to leaving a better future for generations to come. We expect our suppliers to reduce greenhouse gas (GHG) emissions, responsibly manage water resources, use energy and other resources efficiently, and take continuous steps to reduce waste.

- **Greenhouse Gases:** GTTK continuously works to reduce its own GHG emissions and set reduction targets aligned with global goals. We seek to procure electricity from renewable sources and expand energy efficiency initiatives. Suppliers are expected to measure and continuously improve their environmental performance across operations, products, and services and are encouraged to publish annual non-financial (ESG) reports in accordance with internationally recognized standards such as GRI or ESRS.
- **Water Management and Biodiversity:** Suppliers are expected to measure and report water consumption, reduce wastewater, manage water responsibly, protect natural ecosystems, and avoid deforestation.
- **Circular Economy:** Suppliers should support the use of sustainable and renewable resources while reducing waste and increasing reuse and recycling. Suppliers are encouraged to develop innovative methods for recycling production waste and to invest in environmentally friendly product development.

## 6. NON-COMPLIANCE, AUDIT AND CORRECTIVE ACTIONS

GTTK will verify compliance with this Code through regular screenings (desktop and on-site). In the event of non-compliance, GTTK will work with the supplier to implement a Corrective Action Plan (CAP) with clear timelines and responsibilities and will monitor execution.

GTTK will facilitate knowledge transfer and training for suppliers who wish to strengthen areas identified as deficient within their systems in relation to this Code.