

CODE OF CONDUCT AND ETHICAL GUIDELINES

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Code of Conduct and Ethical Guidelines

Statement of the Management

This code contains the principles of **SAB Bröckskes GmbH & Co. KG** as well as the requirements for their suppliers. The principles have been laid down by the management and define the ethical standard for all of our business activities.



As a major employer in the region and a global company, we are aware of our responsibility for people and the environment and have defined the following principles for action, which are also intended to serve as a guideline for our suppliers. Human rights, environmental protection, labour standards and the fight against corruption have always played an important role at **SAB**. We clearly practise these values towards our employees, business partners and the general public.

With the code we promote a culture in which ethical and responsible behaviour is considered a matter of course. This enables us to protect our most important asset - our good reputation. And with these principles we ultimately create sustainable value for our customers and partners. The code sets the standard in this respect and helps us with the implementation in practice.

Code of Conduct and Ethical Guidelines

Statement of the Management

The code is based on three principles.

Customer focus: We build relationships in order to create values over the long term. The priority is on profitability and identifying and resolving conflicts of interest in advance.

Excellent service: We set the highest standards – for our products, as well as the way we work together throughout the enterprise. Only in this way can we offer our customers the best of the entire corporate organisation.

Sustainable performance: We work continually on consolidating our reputation as a rock-solid company and offering our customers the best possible solution. It is essential that all of us follow these principles at all times. In short: if we follow the right course of action as a company, we will become a better and more successful company.

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The Management



Peter Bröckskes



Sabine Bröckskes-Wetten

Code of Conduct and Ethical Guidelines

Laws, Rules and Regulations

Compliance with Laws

Every employee at **SAB** Bröckskes must comply with all applicable laws and regulations in his or her environment, as well as internal instructions.

International Business

When we operate across borders, we comply with all applicable laws, rules and regulations – here at home and abroad.

When dealing with customers from abroad – as a supplier or consumer, during visits or discussions – we have to actively inform ourselves about which rules, laws or directives apply in this regard and then comply with them accordingly. We respect all laws, rules and regulations, including anti-trust and competition laws.

Bribery and Corruption

We do not tolerate any illegal favourable treatment in the form of bribery or similar activities. We accept business courtesies only to the extent that they are in line with standard business practices – and even then only if they do not have any influence on the business decision. Bribes and cartel agreements are not a means for us to obtain a contract. We would rather forgo a contract and the achievement of internal goals than

act against the law. Infringements are not tolerated and result in sanctions against the persons concerned.

All directors, all executives and all other employees must be aware of the exceptional risks which a corruption or anti-trust case can mean for the company, as well as for them personally. Every employee is urged to actively participate in complying with these regulations in his or her area of responsibility.

Money Laundering Prevention

SAB fulfils its legal obligations to prevent money laundering and does not participate in money laundering activities. Each employee is required to have unusual financial transactions assessed in cases of doubt by the competent Finance department, in particular those which include cash that might substantiate a suspicion of money laundering..

Code of Conduct and Ethical Guidelines

Acting Responsibly and Ethically

Acting Responsibly

For us, responsible action is not based exclusively on laws and regulations, but also on the conscientiousness of the individual and the standards that are defined in these guidelines.

Avoidance of Conflicts of Interest

At **SAB**, business decisions are taken exclusively in the best interests of the company. Conflicts of interest involving private matters or various economic or other activities, also involving family members or other closely associated individuals or organisations, should be avoided from the outset. If they nevertheless occur, they should be resolved in accordance with law and order and the applicable corporate guidelines. The prerequisite for this is the transparent disclosure of the conflict.

Customer Relationships

We take care of our customers over the long term. We secure their loyalty by earning their confidence in us. We attempt to anticipate what our customers need – before they ask for it. We do everything possible to offer our customers the best service. We treat everyone fairly and with the same degree of respect and courtesy, regardless of the volume of business.

Correct Market Conduct

We outmatch our competitors through superior performance, not through the use of unfair or dishonest practices. We do not distort or conceal the facts or truth. Nor do we use any information to which we are not entitled to gain an unfair advantage over our competitors. We act fairly, honestly and in good faith towards everyone with whom we are involved: customers, business partners, competitors, suppliers, the public and colleagues.

Code of Conduct and Ethical Guidelines

The Right Corporate Culture

Employee Culture

We at **SAB** Bröckskes consider our employees to be the most important factor in the success of our company. Only through the application of professional and social skills, as well as the creativity and energy of all employees, can we achieve the highest common aim of customer satisfaction and the retention of jobs over the long term. This is why the motivation of our employees is our declared corporate philosophy. In addition to payment above the legal minimum wage, this naturally includes compliance with working hours and acceptance of freedom of assembly. We reject forced and slave labour as well as child labour in any form.

Equal Treatment and Equal Opportunities

A culture of equal opportunities, mutual trust and mutual respect is of major significance to us. We promote equal opportunities and prevent discrimination when recruiting employees and promoting or granting education and training measures. We treat all employees equally, regardless of their sex, age, skin colour, culture, ethnical origin, sexual orientation, any disability, religious affiliation or world view.

Discrimination, bullying and harassment are not tolerated by us. Should such cases nevertheless occur, we encourage each other to speak about them.

Dealing with Customers and Suppliers

The relationships with our customers and suppliers are based on mutual respect, fairness and trust. We always strive for a reliable long-term relationship and therefore always maintain fair and open communication in our dealings and expect the same from our business partners. We pursue clean and recognised business practices and fair competition and responsible procurement.

Quality

We would like to convince our customers with a flawless performance at all times. We therefore focus on all levels on the highest quality standards. To this end we introduced a quality management system according to DIN EN ISO 9001 in 1996. This enables us to repeatedly find measurable parameters for the identification of potential improvements, derive appropriate measures and assess their effectiveness. In this way we want to achieve the highest aim, namely the sustainable satisfaction of our customers.

Code of Conduct and Ethical Guidelines

The Right Corporate Culture

Occupational Health and Safety

In addition to the quality of our products and economic success, the health and safety of our employees are a corporate goal which is of equal importance. Occupational health and safety are an integral part of all business operations and are integrated from the very beginning – even in the planning phase – in our technical, economic and social considerations.

Each of our employees promotes health and safety in their working environment and adheres to the rules on health and safety at work. Every manager is obliged to instruct and support their employees in assuming this responsibility.

We comply with the statutory health and safety regulations and protect our employees from risks when carrying out their work. In order to systematically implement these occupational health and safety requirements, we introduced an occupational health and safety management system according to NLF/ILO-OSH und DIN ISO 45001 in 2009.

We also expect our suppliers to fulfil the applicable occupational safety regulations.

Collaboration

We think across various divisions and countries and see our company as a unit.

It is especially important for us to listen, openly discuss topics, actively obtain different opinions and search for solutions together. The best solution is created by exchanging different points of view. We criticise objectively and not personally.

Society and the Environment

Sustainable Environmental and Climate Protection

Sustainable environmental and climate protection and resource efficiency are important corporate goals for us. In both the development of new products and the operation of production facilities, we ensure that their impacts on the environment and climate are kept as low as possible and that our products make a positive contribution to environmental and climate protection among our customers.

Every employee bears responsibility for dealing sparingly with natural resources and contributing towards the protection of the environment and climate with their individual behaviour.

We comply with the environmental protection regulations and standards and contribute actively to the preservation of our environment. Since 2006 we have had a certified environmental management system according to DIN EN ISO 14001. With this we comply with our self-imposed duty to preserve the natural resources for ourselves and future generations.

Energy Management

We handle our resources carefully and attempt to continuously improve our processes and procedures in this respect. Since 2011 we have had a certified energy management system according to DIN EN ISO 50001 in place.

We invest in our communities

We see ourselves as an active member of society, in which we are involved in different ways. We constantly examine how we can contribute to the welfare of local communities. For this purpose we support charitable initiatives with financial or other resources.

Handling Information and Data

The trade secrets and business information of our partners are treated sensitively and confidentially.

Publications

If we exchange or disclose information with or to the public, we are careful to ensure that this information is as accurate, up-to-date and understandable as possible.

Society and the Environment

Insider Information

We only use insider information (important information that is not public) for the purpose for which it was originally made available to us. We carefully determine whether the information is insider knowledge and then only forward such information to those that actually need it for their work. This applies to everyone within and outside **SAB**. In doing so, we are guided by our internal rules and regulations.

Confidentiality of Customer Data

Our customers rely on us to keep their information secure and to use it only for the agreed purposes. We apply the highest standards of information security. As a result we ensure that our customers' information remains confidential and that their statutory data protection rights are respected. With strict standards and procedures for data security, we ensure that the data cannot be manipulated, is not stolen, does not fall into the wrong hands and cannot become lost or destroyed. We disclose information about our customers only if our customers explicitly agree to this.

Conflict Metals

We have received written statements from our suppliers to the effect that the products delivered to us do not contain any so-called conflict metals (in particular no tin) which were mined in the Democratic Republic of the Congo or its neighbouring states. The above information is based on information provided by the suppliers of our wires and cable strands.

Absence of Harmful Substances according to RoHS

Absence of harmful substances acc. to RoHS II - directive 2011/65/EU and commission delegated directive (EU) 2015/863 amending annex II to directive 2011/65/EU as well as GefStoffV annex IV - no. 24.

The components of the indicated items are free of harmful substances according to the above mentioned directives as well as hazardous material regulation annex IV no. 24 medium of flame protection.

Society and the Environment

REACH Regulation

Regulation (EC no. 1907/2006).

With the help of this REACH regulation for chemicals it is controlled how and why manufacturers, importing companies, final users and retailers have to examine, assess, declare and register chemical substances.

SAB Bröckskes GmbH & Co.KG as manufacturer of products has got acc. to REACH the role of a postponed user of chemicals. These products are exempted from any registration according to REACH.

Substances can be included in our products, as they are possibly ingredients of materials that we use for the manufacturing of our products. The ECHA (European Chemicals Agency) has published the SVHC list (substances of very high concern) that is subject to a current updating. We are in permanent exchange with our suppliers regarding hazardous materials. As soon as a SVHC substance is identified as a component of our products (concentration $\geq 0,1$ weight -%), we introduce a process of substitution in order to exchange the concerned material with the help of an equivalent. If this isn't possible, we have the duty to provide information by declaring the substances for the concerned product. If a product doesn't contain such SVHC substances, it is not necessary to declare this explicitly.

Global Automotive Declarable Substance List

The Global Automotive Declarable Substance List (GADSL) is a list containing possible substances used in automobile parts that stay in the vehicle for its complete life cycle. It is the result of the worldwide and long lasting efforts of representatives in automobile industry to simplify the communication and information exchange regarding the use of certain pure chemical substances in automotive parts.

The GADSL contains declarable and forbidden materials. Although the GADSL is not legally binding, it is a tool to implement legal measurements for example the recycling of end-of-life vehicles within the European Community acc. to guideline 2000/53/EG. We at S Bröckskes GmbH & Co. KG are in permanent contact with our material suppliers regarding the content. We dispose of the corresponding material declarations from our suppliers if substances of GADSL are contained which are either declarable or forbidden. On request we are always prepared to send you the necessary information as material declaration.

Code of Conduct and Ethical Guidelines

Filling the Code with Life

Implementation and Contact Persons

SAB Bröckskes GmbH & Co. KG and its subsidiaries actively promote the communication of the guidelines underlying the code of conduct. The individual companies ensure their implementation and ensure that no employee is placed at a disadvantage as a result of adhering to the guidelines and agreements.

Our executives have a special function as role models and their actions are measured to a particular extent against the code of conduct. They are the first points of contact for questions concerning an understanding of the regulations and ensure that all employees know and understand the code of conduct.

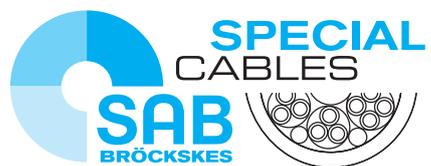
As part of their managerial duties they prevent unacceptable behaviour and take appropriate measures to prevent infringements of the rules in their area of responsibility. Good cooperation based on trust between employees and management is reflected in honest and open information and mutual support.

Further information about the Code of Conduct is also available to all employees and third parties (customers, suppliers, etc.) from the central email address

codeofconduct@sab-broeckskes.de.

Information about possible violations of laws or guidelines from the fields of anti-trust law and corruption that affect people and companies within the **SAB** Group can be reported. All information will be kept strictly confidential.

The Management



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