



Code of Conduct / Sustainability Grupo Cablerias Suppliers

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Introduction

The Code of Conduct and Sustainability of Suppliers of Cablerias Group, determines the minimum ethical and responsible behavior standards that must be followed by suppliers in the development of their activity, in accordance with the corporate culture of Cablerias Group (hereinafter Cablerias), firmly based on respect for human and labor rights.

Cablerias is committed to provide the necessary means so that suppliers know and understand this code and can assume its compliance.

The Code applies to all suppliers involved in the purchasing, manufacturing and finishing processes. It is based on the general principles that define the ethical behavior of Cablerias and promotes them:

- All its activities will be carried out in an ethical and responsible manner.
- Any person who maintains, either directly or indirectly, a professional, economic, social or industrial relationship with the company Will be treated fairly and respectfully.
- All its activities shall be carried out in an environmentally friendly manner.
- All its suppliers (production sites not owned by Cablerias) Will fully adhere to these commitments and promote their responsibility to ensure that the standards set out in this Code are met.

Prohibition of Forced Labor

Cablerias will not allow any form of forced or involuntary labor in its manufacturers and suppliers. They may not require any "deposit" from their workers or withhold any documentation proving their identity.

Suppliers shall recognize the right of their workers to leave their workplace with reasonable notice¹.

Prohibition of Child Labor

Suppliers must not hire minors. Cablerias defines a minor as a person under 16 years of age.

If local legislation establishes a higher age limit, this limit will be respected²

Individuals between 16 and 18 years of age are considered to be juvenile workers. They shall not work night shifts or under dangerous conditions³.

¹ Aspects related to these limitations shall be governed by Conventions 29 and 105 of the International Labor Organization (ILO)

² Those aspects related to the prohibition of child labor shall be developed according to Conventions 138 and 182 of the International Labor Organization (ILO)

³ Issues related to the working conditions of youth workers shall be governed by ILO Recommendation 190.

Prohibition of Discrimination

Suppliers must not engage in any discriminatory practices in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, creed, national origin, religion, age, physical or mental disability, gender, marital status, sexual orientation, and/or union or political affiliation⁴.

Respect for Freedom of Association and Collective Negotiation

Suppliers shall guarantee their workers, without exception, the rights to association, affiliation and collective bargaining, without any reprisals arising from their exercise, and shall not offer remuneration or payment of any kind to employees with the purpose of obstructing the exercise of such rights. They shall also adopt an open and cooperative attitude towards the activities of trade unions.

Workers' representatives shall be protected against any kind of discrimination and are free to carry out their functions as representatives in their workplace.

Where the rights of freedom of association and collective negotiation are restricted by law, appropriate channels shall be designed to ensure their reasonable and independent exercise⁵.

Prohibition of Abuse of Inhumane Treatment

Suppliers shall treat their employees with dignity and respect. Under no circumstances will physical punishment, sexual or racial harassment, verbal or power abuse, or any other form of harassment or intimidation be tolerated.

⁴ Aspects related to labor practices will be developed in accordance with ILO Convention 111.

⁵ Aspects related to association freedom and collective labor agreements Will be developed by ILO Conventions 87, 98 and 135.

Occupational Health and Safety

Suppliers shall provide their employees with a safe and healthy workplace, ensuring at least basic conditions of light, ventilation, hygiene, fire protection, safety measures and access to drinking water.

Workers shall be provided with clean toilets and drinking water. When conditions require it, facilities for food preservation should be provided.

Sleeping quarters, if provided, shall be hygienic and safe.

Suppliers shall take the necessary measures to prevent accidents and damage to workers' health, by minimizing, as much as possible, the risks inherent to the work.

Suppliers shall provide their workers with regular occupational health and safety training. The company shall keep an appropriate record of the training courses given. They shall also appoint a health and safety manager within the company's administration with sufficient authority and decision-making capacity⁶.

Payment of Wages

Suppliers shall ensure that the wages paid to their workers are at least the legal minimum wage or the minimum wage established by agreement, whichever is higher. In any case, the aforementioned salary shall always be sufficient to cover at least the basic needs and any other reasonable extra necessities of the workers and their families.

Suppliers shall not make withholdings and/or deductions from workers' salaries for disciplinary reasons or for any other reason other than those established in the applicable law, unless expressly authorized by them. Likewise, they shall provide their workers with written and understandable information on their salary conditions upon hiring. They shall also provide their workers with information on their particularities at the time of their periodic salary settlement.

To finish with, they shall ensure that wages and other allowances or benefits are paid in a timely manner in accordance with applicable law and, in particular, that payments are made in the most convenient manner for workers⁷.

⁶ Aspects related to working conditions, health and safety at work are regulated by ILO Convention 155.

⁷ Aspects related to wage payments are regulated by ILO Conventions 26 and 131.

Non-excessive Working Hours

Suppliers must adjust the length of the working day to the provisions of the applicable legislation or to those established by agreement for the industry in question, if the latter is more favorable to the worker.

Manufacturers and suppliers shall not require their employees to work, as a general rule, more than 48 hours per week and they shall be recognized, on average, at least one day off for each period of 7 natural days.

Overtime must be voluntary, not exceed 12 hours per week, must not be required on a regular basis and must be paid at a higher rate than the normal hourly rate, in accordance with the provisions of the legislation in force⁸.

Regulated Labor

Suppliers commit themselves to ensure that all employment contracts they develop are within the scope of the applicable local legislation. In this way, they will not undermine the rights of workers recognized in labor and social security legislation through formulas in which there is no real intention to promote regular labor, within the framework of ordinary employment relations.

Production Traceability

Suppliers may not transfer production to third parties without prior written authorization from Cablerias. Those who do so will be responsible for compliance with this Code by such third parties and their workers.

Similarly, suppliers shall apply the principles of this Code to outworkers who are part of its production chain and provide transparency to the places and working conditions of such workers.

⁸ Working hours will be regulated by ILO Conventions 1 and 14.

Product Health and Safety

Suppliers are responsible for all products supplied to Cablerias to comply with Cablerias' Health and Safety standards so that the items commercialized do not imply risks for the customer.

Environmental Commitment

The suppliers will maintain a consistent commitment with environmental protection and will meet the standards and requirements set forth in the applicable local and international legislation.

They also undertake to comply with environmental standards established by Cablerias. This includes —where appropriate— the measures to reduce and compensate for such impact as may be necessary to apply these standards.

Suppliers must preserve the environment, developing actions for constant improvement in the control of greenhouse gas emissions, energy efficiency and use of natural resources such as water. They must also control the use and disposal of potentially hazardous chemical substances and reduce waste throughout the production chain as well as in their environmental management systems overall.

It is important and vital to control air and water quality.

Information Confidentiality

Suppliers have an obligation to preserve the integrity and confidentiality of the information they receive due to the business relationship they have with Cablerias.

The obligation of confidentiality shall remain after the termination of its business relationship with Cablerias and shall include the duty to return any material related to the company that the supplier has in its possession.

Code Implementation

Suppliers shall implement and execute programs to put this Code into practice. They shall designate a management representative who shall be responsible for the application and enforcement of this Code.

Suppliers shall make this Code known to all their employees and to those who are in any way involved across the Cablerias supply chain.

A copy of the Code, translated into the local language, shall be posted in an accessible place for all workers.

a) Transparency and Sustainability in contracting

Suppliers shall maintain an honest, upright and transparent behavior in their activity, keeping an adequate system of accounting records, enabling the traceability of their decisions, as a preventative measure against any corruption, bribery and extortion that may occur. Suppliers should not offer, grant, request or accept gifts or benefits to / from buyers of Cablerias that violate what is agreed in Cablerias' Code of Conduct. Suppliers shall not manipulate or influence their employees or falsify files or records in such a way as to alter the processes of verifying compliance with this Code.

They must not offer or accept any remuneration that is intended, whether intentionally or not, to interfere with the impartiality or objectivity of those parties designated by Cablerias to conduct inspections and audits of compliance with this Code.

b) National Legislation, Conventions and Agreements

This Code's provisions represent the minimum standards only. In the case that national legislation or any other applicable legislation or any other commitments assumed or applicable, including collective bargaining agreements, regulate the same matter, the most favorable regulation for the worker will be applied. Cablerias assumes as part of its internal regulations the content of agreements and conventions, national and international, to which it has adhered and which are relevant to its business relations with suppliers. Cablerias hereby commits itself to promote and comply with them.

c) Control and Supervision of Compliance

Suppliers shall authorize Cablerias and/or designated third parties to supervise the adequate fulfillment of this Code. For this purpose, they will grant the means and access to the facilities and documentation necessary to ensure such verification through audits. Also, suppliers will be sent self-assessment surveys in order to ensure that they implement the requirements of this Code of Conduct and Sustainability.

d) Mechanism for complaints

This Code is aligned with the principles and values contained in Cablerias' Code of Ethics and Conduct, and has a complaint system in order to ensure its compliance.

Accordingly, and to ensure compliance with this Code of Conduct/Sustainability of Suppliers, Cablerias may act on its own initiative or at the request of a manufacturer, supplier or third party with direct relationship and legitimate commercial or professional interest, by means of a complaint made in good faith.

To this end, communications made under this Code, whether containing complaints of non-compliance or queries regarding its interpretation or application, may be sent to the company via any of the following means:

- Regular mail to the following address:
Industrial Park As Gándaras, Lot 204, 36400, Porriño (Spain)
To the attention of the Ethics Committee.
- Email to the following address: recursoshumanos@cableriasgroup.com
- Fax to: +34 986 295 086.