

Sustainability Guideline for Suppliers to TSUBAKI KABELSCHLEPP GmbH (TKG) and KABELSCHLEPP GmbH-Hünsborn (KSH)

I. Introduction

Global environmental and energy problems as well as many social issues have worsened in recent years. At the same time, we are becoming a highly developed information society that places a variety of complex requirements on companies.

TKG and KSH want to exceed these expectations in line with the global corporate philosophy "TSUBAKI SPIRIT".

On the one hand, we are accepting our social responsibility as a company, while on the other hand, as a Group, we are working on resolving social issues with technological innovations.

In the future, we will pursue the higher-level goal of contributing to a sustainable society and mitigating social issues through our business activities. It is therefore crucial for us to examine our entire supply chain, including all our suppliers.

This Sustainability Guideline makes suggestions as to how our suppliers, including their subcontractors, can take proactive measures.

The aim of a sustainable development can be achieved only by balancing the three pillars "environment", "society", and "industry". TKG and KSH focus on all three areas equally.

II. Purpose of the Sustainability Guideline

This Guideline clearly sets out the fundamental expectations for suppliers. These help to understand the sustainable approach of TKG and KSH, to promote the resolution of social issues through our joint business operations and to achieve sustainable growth.

The aim is to ensure that our suppliers comply with these standards throughout the entire supply chain.

III. Fundamentals of cooperation

We ask our suppliers take the following aspects into consideration:

- Complying with the guidelines and continuous improvement
- Ensuring all relevant information throughout the entire supply chain
- Consenting to the guidelines and confirming compliance (on request)
- Duty to inform in emergencies that put the cooperation at risk

IV. Integrity and fairness in business operations

1. Complying with legislation and regulations

Please follow the industry standards for fair business practice and comply with all laws and regulations in the countries and regions where you operate. Do not commit any socially reprehensible or unacceptable actions, even if these do not violate any laws or regulations.

Introduce reporting and training systems to ensure comprehensive compliance with the regulations. Promote freedom of speech and do not disadvantage employees who report misconduct and have complied with the implemented systems.

2. Complying with competition laws

Comply with the competition laws of the individual countries and regions and refrain from any private monopolization, unfair trade restrictions (cartels, bid rigging, etc.), unfair practices, or misuse of a market-dominating negotiation position.

3. Preventing corruption and bribery

With regard to political donations or contributions, strictly comply with the laws and regulations of the respective country. Strive to establish transparent and fair relationships with political parties or administrative bodies. Do not give/accept any gifts, entertainment or money to/from business partners with the objective of obtaining or receiving unjustified interests or unlawful preferential treatment.

4. Strengthening export transactions

Comply with the laws and regulations of each country and region with respect to export and customs checks. Verification of thorough execution of these checks and the implementation of an appropriate management system must be provided on request.

5. Protection of intellectual property and prevention of legal infringements

Protect the intellectual property rights of the company. Do not unlawfully appropriate or use the intellectual property of third parties and do not infringe upon their rights.

V. Risk management

1. Establishing a risk management system

Identify, analyze and evaluate different risks that can have a substantial influence on your business operations, and prevent these risks from occurring. In addition, you should implement a management system for minimizing losses.

2. Reacting to emergencies

In the event of a disaster or emergency, protecting human lives is the top priority. Work closely with the responsible institutions to ensure a fast response and restoring of the supply chain, among other things. A report must be sent to our appropriate procurement department. In addition to this, conduct training courses and exercises for emergency situations and proactively improve the crisis management in your organization.

3. Appropriate disclosure of information

To further strengthen the trust of both contract parties, information should be communicated in good time. Open and fair communication promotes better mutual trust and understanding.

The personal and confidential information of all those involved must be obtained in an appropriate and proper manner, checked stringently, protected, and used within the appropriate scope.

The proactive reduction of information security risks is based on the "Electronic Information Security Policy" of the Tsubaki Group.

VI. Quality management

1. Quality assurance

As part of the fundamental quality policy of TSUBAKI KABELSCHLEPP, a quality assurance system must be established in order to continuously improve the product quality and operational quality in all direct and indirect areas of business.

2. Product safety

Comply with the laws, regulations, and safety standards with regard to product safety and take all possible measures to deliver safe products

VII. Human rights, work, health, and safety

1. Respecting human rights

Educate yourself on the fundamental human rights policy of TSUBAKI KABELSCHLEPP, which is based on the "International Bill of Human Rights" and other international standards. Respect human rights.

2. Promoting diversity

Respect the diversity of your employees. Understand that the work of each and every employee forms the basis for the company's success. Actively promote the development of a work environment in which the diversity of the human resources plays an active role. Strive to establish fair and equal relationships with your employees. Promote increased added value through measures to improve productivity.

3. Discrimination

Ban discrimination based on race, ethnic group, background, nationality, religion, sex, disabilities, age, etc. in all employment situations (applications, hiring, promotions, wages, dismissals, resignations, task assignment, disciplinary measures, etc.) and respect equal opportunities.

4. Harassment

Do not allow any form of harassment, including abuse of power and sexual harassment, or any other behavior that violates someone's dignity. Report and investigate all complaints about harassment without delay. Additionally ensure that the employees can report harassment without having to fear retaliation, threats, or other harassment and/or having to endure further harassment.

5. Child labor

Ban all employment of children who have not yet reached the legal working age. Comply with the laws and regulations of the individual countries and regions.

6. Forced labor

Ensure that everyone is working voluntarily and that employees are free to leave their work or to terminate their employment.

7. Appropriate working conditions

Comply with the laws and regulations of the respective country and region with respect to wages, working hours, and other working conditions, and strive to establish and maintain appropriate working conditions.

8. Dialog with employees

Conduct an open dialog with your employee representatives or your employees and recognize the rights that they have as per the laws and regulations of the respective country and region.

9. Safe and comfortable working environment

Strive to ensure the safety and health of your employees in the workplace and to prevent workplace accidents by implementing the fundamental health and safety policy of TSUBAKI KABELSCHLEPP. In addition, support the development of the physical and mental health of your employees.

10. Implementing sustainability education

Train your employees not only with respect to products and technologies but also in aspects of sustainability.

VIII. Environmental management

Strive to introduce and continuously improve your environmental management system. Promote efficient use of energy and resources and proper handling of waste and hazardous chemicals, as well as recycling. Proactively strive to reduce your environmental impact.

Set an appropriate target for CO₂ reduction in line with the guidelines of the Paris Agreement and promote activities for reducing emissions. Reduce energy consumption with targeted measures.

Respect nature and biodiversity.

Take the environmental impact of your products into account for planning, development, and design and actively develop environmentally friendly products. New products or product improvements should take into account the global, ecological, and social aspects. Strive to reduce the environmental impact of your products during their entire life cycle.

IX. Sustainable procurement

Offer suppliers who want to do business with you open, fair, and just opportunities. Select suppliers based on fair and impartial evaluations using a variety of indicators.

Ensure transparency in the supply chain for mineral raw materials, other materials, and components. Take measures to avoid the use of conflict minerals. Do not finance any armed groups if you know that your suppliers are involved. Disclose this information if requested by us or our customers.

Comply with the global "Green Procurement Guidelines". Promote the procurement of materials that contribute to preserving the global environment.

To promote sustainability activities in the entire supply chain, inform your suppliers about the content of this Guideline and also support their activities.