



Code of Conduct

Our Strategic Foundation: Mission, Vision, and Values.

Our Code of Business Conduct and Ethics was written with all our stakeholders in mind. We are admitted, leading cable manufacturer, designing and producing quality low-voltage cables for industry and key infrastructure projects.

We deliver quality products to great number of customers in Poland and the European Union. Throughout more than 40 years of operations, we have consistently focused on technological development and innovation.

Mission and Vision

Our mission is to create reliable and innovative cables that support the sustainable development of energy and industrial infrastructure. We provide high-quality solutions, addressing customer needs in a safe, responsible, and ethical manner.

We strive to strengthen our position as a quality leader in the industry, setting standards for responsible business. We aim to be recognized not only for technical excellence but also for our commitment to people, the environment, and transparent governance principles.

Values

- Innovation – we invest in technologies that support the energy transition and low-emission production processes.
- Safety – we care for people, processes, and products.
- Quality – we ensure the reliability and durability of our cables.
- Trust – we build long-term relationships with stakeholders based on transparency and accountability.

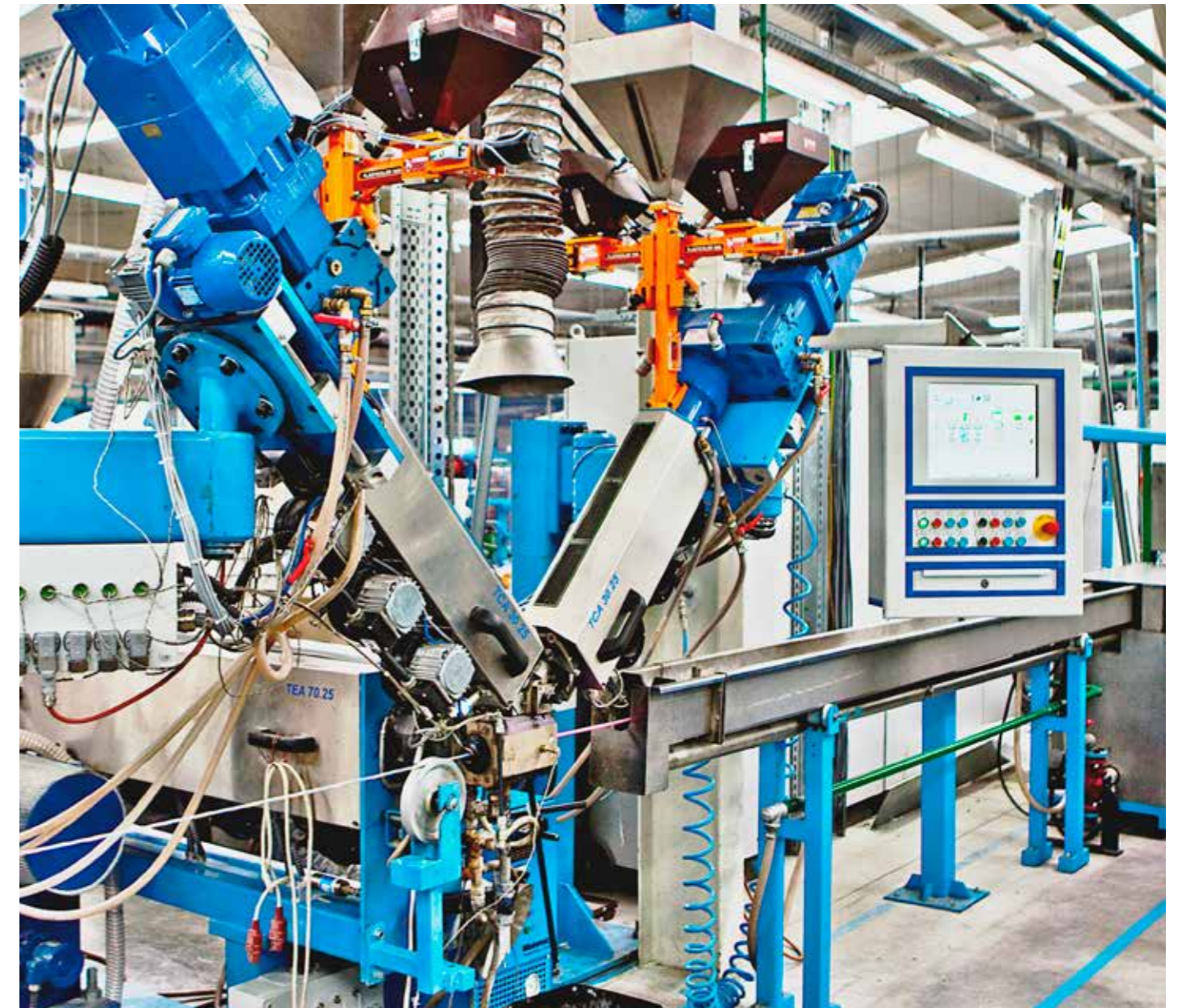


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Purpose of the Business Code of Conduct.

This Business Code of Conduct has been developed to serve as a foundation for our operations and to establish the standards that guide all aspects of our activities.

Its goal is to promote an ethical work environment, which is an indispensable element of our company's sustainable development. This document contains principles of conduct regarding employees—including managers and directors—shareholders, and business partners, and it defines our expectations towards suppliers and stakeholders. Our priority is to foster a workplace culture where integrity, responsibility, and respect are paramount values.

This Code is not merely a set of rules, but a guide that assists in making decisions consistent with our values and aspirations. We believe that transparency and honesty are fundamental to building lasting relationships both within the company and with our external partners and customers. Our goal is also to inspire employees toward continuous improvement and innovation, which is essential in a dynamic business environment. Each of us, regardless of role or position, is responsible for adhering to the principles set forth in this Code.

While our Code of Conduct cannot address every question or issue that may arise during our operations, it establishes clear principles by which the company operates, guided by ethics, integrity, social responsibility, and environmental stewardship.

Together, we build an organization that is synonymous with quality and trust, and this Code is an expression of our commitment to conducting business in an ethical and responsible manner. We encourage everyone to familiarize themselves with the Code and to actively participate in shaping an ethical organizational culture.

[Management Board of Technokabel S.A.](#)

Business Code of Conduct: Values and Ethics

Company Values

Our values include innovation, safety, quality, and trust. We strive to realize these values in every aspect of our operations.

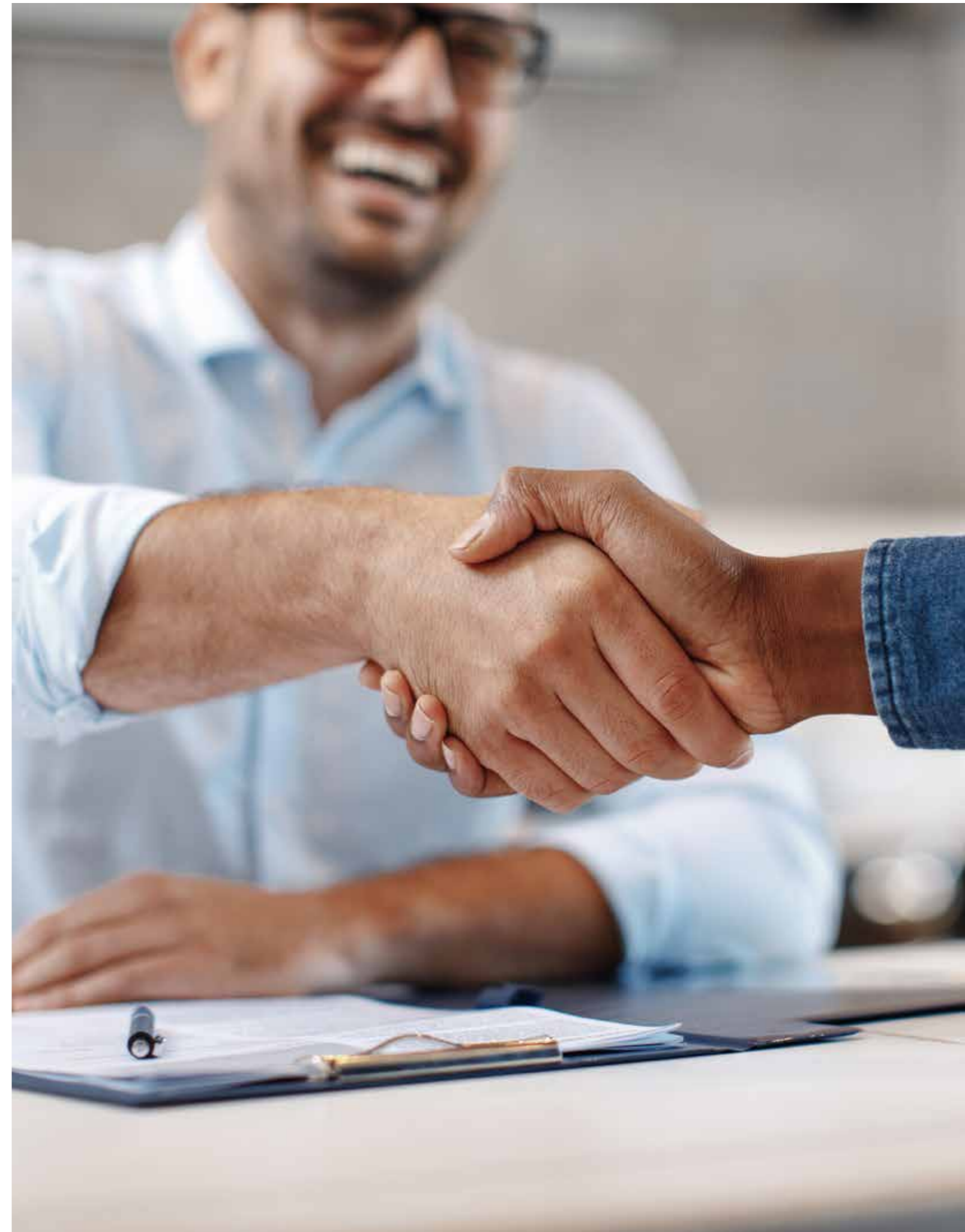
Ethical Business Conduct

We are committed to conducting our business ethically, adhering to the highest standards of integrity and transparency. We expect the same from our employees, suppliers, and business partners.

We operate in accordance with: the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) Conventions, the UN Sustainable Development Goals (SDGs), and EU Regulation 2017/821.

Social Responsibility Principles

We engage in activities supporting local communities by sponsoring educational, social, and ecological initiatives. We aim to create a positive social impact through our products and actions.





Code of Ethics.

- We act ethically and in compliance with the law. We do not offer, solicit, or accept any benefits that could influence the impartiality of business decisions. Any gift or invitation exceeding the established threshold of PLN 200 must be reported to a supervisor.
- We maintain transparency in public procurement processes: we do not coordinate prices, tender terms, or other sensitive information with competitors. We do not influence tender criteria or the decisions of the contracting party in a manner contrary to the law or fair practices.
- We build and protect customer relationships based on reliable information regarding products and services, a prohibition on misleading practices, and the fair treatment of all customers without unjustified preference.
- We protect the confidential technical and commercial information of our customers and Technokabel S.A. We use such information solely for professional purposes, secure it against unauthorized access, and do not disclose it to third parties without a legal or contractual basis.
- We collect and utilize business information exclusively from legal sources. We do not obtain competitor data through unauthorized access, impersonation, or breaches of confidentiality agreements.
- We adhere to competition law and antitrust regulations. We do not enter into agreements that restrict competition (e.g., price-fixing, market sharing, boycotts) and do not abuse a dominant position. In case of any doubt, we consult our actions with legal counsel.
- We compete decisively but solely through permitted commercial practices: superior quality, price, innovation, and service. We refrain from disparaging competitors, providing false information, or infringing upon third-party intellectual property rights.
- Every employee and stakeholder is obligated to immediately report any suspected violation of this Code through designated reporting channels. Any individual reporting in good faith is protected against retaliatory actions.

Business Code of Conduct: Human Rights.

Principles of Respect for Human Rights

- We respect and promote human rights in all aspects of our operations, including relations with employees, suppliers, subcontractors, and other business partners.
- We do not tolerate any form of discrimination, harassment, mobbing, or violence, nor any form of forced labor, human trafficking, or child labor.
- All personnel decisions (recruitment, promotion, remuneration, termination) are based exclusively on objective and legally compliant criteria.

Whistleblowers and Reporting Procedure

- We protect whistleblowers—both employees and external stakeholders.
- We provide confidential channels for reporting violations (via telephone at +48 728 419 049, e-mail at sygnal@technokabel.com.pl, or by mail to Nasielska 55, Warsaw).
- We maintain an obligation to acknowledge receipt of reports and to provide information regarding follow-up actions.
- We strictly prohibit any retaliatory actions against individuals reporting in good faith.

Equality and Non-discrimination

- We promote equal opportunity and diversity in the workplace.
- We strive to create an environment where every employee is treated with respect and dignity.
- Any manifestations of unequal treatment—including those based on disability, gender identity, sexual orientation, race, nationality, religion or belief, age, or other personal characteristics—are reported and subject to clarification in accordance with our anti-discrimination procedure.



Working Conditions and Corporate Environment.

Working Conditions

- We provide a safe and hygienic working environment for all our employees, in accordance with Health and Safety (BHP) regulations and HSSE principles.
- We invest in their professional development by offering training and promotion opportunities.
- Working hours, rest periods, and remuneration are structured at a minimum in accordance with the law and applicable regulations.

Relationships, Environment, Property, and IT

- We respect the privacy of employees and other individuals by processing personal data exclusively in accordance with data protection regulations and internal procedures.
- We care for the natural environment, limit the negative impact of our operations, and comply with environmental protection regulations as well as our HSSE procedures.
- We utilize company assets (equipment, materials, vehicles, IT systems) and electronic communication tools solely for business purposes, in accordance with cybersecurity principles.
- Any loss, theft, or misuse of company property must be immediately reported to a supervisor or the IT department.
- Every actual or potential conflict of interest must be disclosed immediately to a supervisor or in accordance with the procedure specified in the Code.





Business Code of Conduct: Environment.

Environmental Commitments

- We are committed to minimizing our environmental impact by implementing sustainable production practices, recycling, and efficient resource management.

Waste and Resource Management

- We utilize advanced technologies and procedures to reduce waste, conserve energy, water, and fuel, and increase raw material efficiency.

Sustainable Development

- We strive for continuous improvement of our production processes to make them more ecological and environmentally friendly.
- We utilize energy that is 100% derived from renewable sources, thereby minimizing our carbon footprint.

Compliance and HSSE

- We care for the natural environment, limit the negative impact of our operations, and comply with environmental protection regulations as well as our HSSE procedures.



We focus
on green energy!



Business Code of Conduct: Anti-Corruption.

Anti-Corruption Principles

- We maintain a zero-tolerance policy for all forms of corruption, bribery, financial abuse, and fraud. We do not offer, promise, give, solicit, or accept any unauthorized material or personal benefits that could influence or appear to influence a business decision.
- This prohibition specifically includes: bribes, so-called facilitation payments, illegal rebates, commissions, gratuities, excessive gifts and hospitality, and any hidden payments to employees, contractors, officials, or other third parties.

Gifts, Hospitality, and Conflicts of Interest

- Gifts, invitations, and other forms of hospitality may only be accepted or offered if they have a moderate value, comply with law and business custom, are transparent, relate to a justified business purpose, and are not intended to exert unauthorized influence. The offering or acceptance of cash and cash equivalents is strictly prohibited.
- We avoid conflicts of interest and do not make business decisions guided by the private interests of ourselves, family members, or close associates. Every actual or potential conflict of interest must be disclosed immediately to a supervisor or in accordance with the procedure specified in the Code.

Anti-Corruption.

Reporting Mechanisms and Whistleblower Protection

- We provide secure and confidential channels for reporting suspected corruption and other violations (telephone, e-mail, form, or address specified in the procedure). Reports may be submitted anonymously, subject to statutory requirements. Regardless of the chosen form, all information received is processed with strict confidentiality.
- Any retaliatory actions against individuals reporting in good faith or cooperating in the clarification of reports are strictly prohibited. Whistleblower protection applies from the moment a report is made; any violation of this non-retaliation policy results in disciplinary sanctions, including termination of contract.
- We are committed to providing feedback to the reporting individual regarding follow-up actions within the timeframes specified in the whistleblower procedure and legal regulations.

Anti-Corruption.

Internal Procedures and Documentation

- We maintain internal procedures, controls, and training aimed at identifying and mitigating the risk of corruption, including in procurement, sales, and tender processes, as well as in cooperation with intermediaries, distributors, and consultants.
- We maintain reliable, complete, and timely documentation of all transactions and payments to ensure they faithfully reflect the company's economic operations and prevent the concealment of corruption or abuse.

Quality Policy.

Quality Objectives

- Our objective is to deliver products of the highest quality that meet our customers' expectations and comply with international standards.

Production Standards and Quality Control

- We apply rigorous production standards and control procedures to ensure the reliability and durability of our products.
- Every stage of production is monitored and controlled.

Continuous Improvement and Innovation

- We invest in research and development to constantly improve our products and processes.
- We strive to introduce innovations that bring benefits to both our customers and the environment.

Certified Cable Quality



Quality Policy.

Quality, Environmental, and Occupational Health and Safety (OHS) Policy

To fulfill our mission and achieve our established objectives, we adhere to the following principles:

- Maintaining high quality in our work, products, and services.
- Identifying, planning, and managing processes, along with a systematic assessment of their effectiveness and profitability, combined with continuous improvement.
- Inspiring innovative activities and ensuring the constant development of our products, technologies, and organization.
- Compliance with applicable legal regulations regarding Occupational Health and Safety (BHP) and Environmental Protection.
- Constant minimization of workplace hazards, accident prevention, and the prevention of occupational diseases.
- Reducing the environmental impact of our production and service activities regarding atmospheric emissions, noise, and waste management.
- Enhancing qualifications and engaging all employees in the process of continuous improvement across all operations.
- Providing appropriate resources for the implementation of the aforementioned policy principles.
- The guarantee of achieving these set goals is the functioning of an Integrated Management System based on the following standards:

Quality Management (PN-EN ISO 9001:2015).

Environmental Management (PN-EN ISO 14001:2015).

Occupational Health and Safety Management (PN-N-18001:2004).

TÜV certificate



- ✓ ISO 9001:2015
- ✓ ISO 14001:2015

Conflict Minerals Policy.

Definition of Conflict Minerals

- Conflict minerals are raw materials mined in regions affected by armed conflict, where their exploitation contributes to human rights violations.

Raw Material Sourcing Principles

- We are committed to sourcing raw materials exclusively from suppliers who adhere to the principles of sustainable development and are not involved in activities that violate human rights.

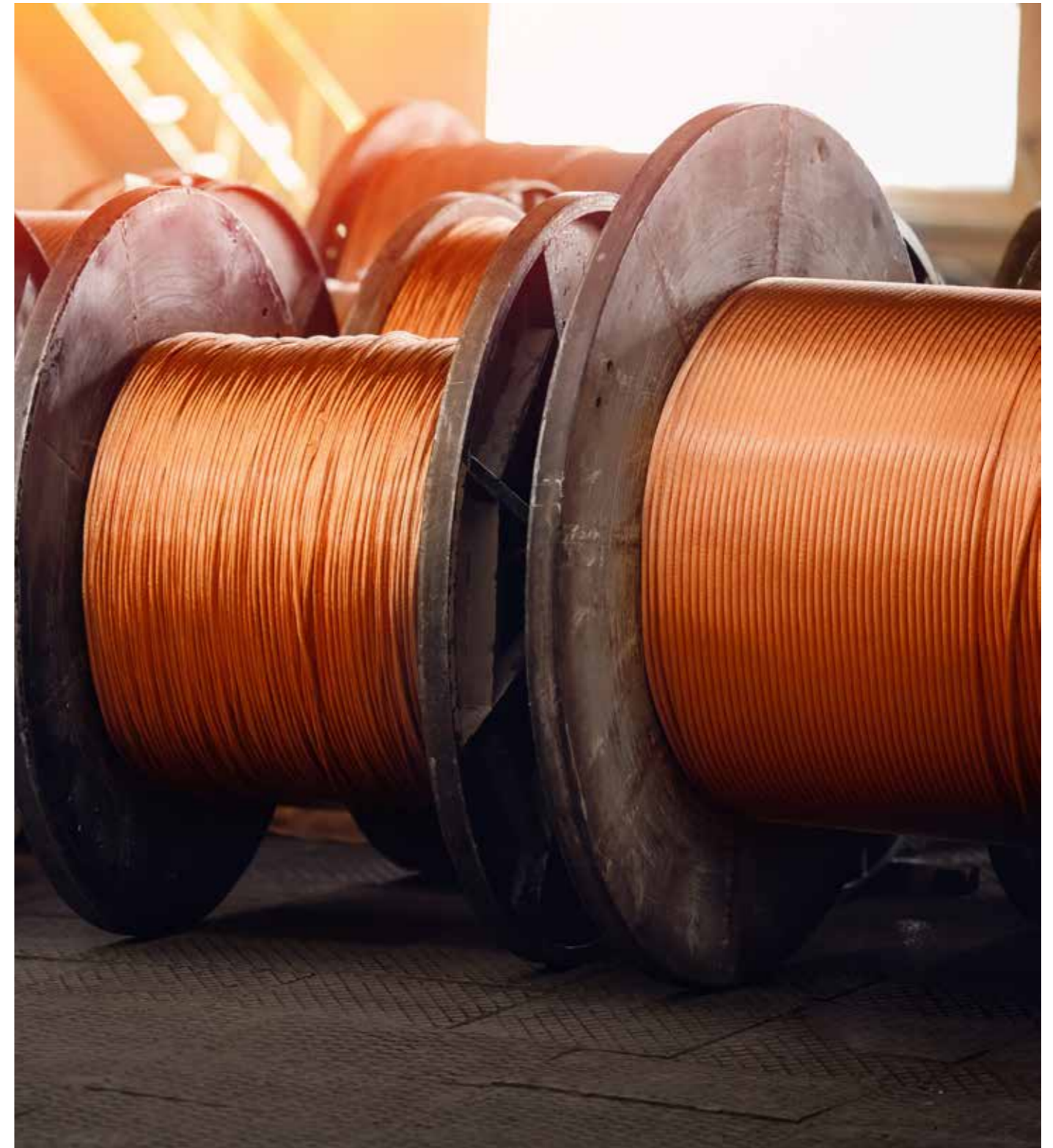
Supplier Collaboration

- We cooperate with our suppliers to ensure full transparency of the supply chain.
- We require our suppliers to practice responsible sourcing of conflict minerals (3TG) and to provide an up-to-date CMRT (Conflict Minerals Reporting Template) Declaration.

TECHNOKABEL S.A., as a manufacturer of cables for all applications, conducts its business with the utmost respect for ethics and corporate responsibility. In our operations, we make every effort to ensure that all raw materials and components used in our production processes originate solely from reliable sources. We ensure they do not come from areas subject to international restrictions, armed conflicts, or regions known for systematic violations of international law, including human rights abuses.

In the technological process of manufacturing certain cables, we use copper wires coated with a layer of tin, which is one of the materials defined in EU Regulation No. 2017/821 as so-called "conflict minerals". Therefore, to maintain these principles within the supply chain, TECHNOKABEL S.A. requires its suppliers of tinned wires to provide declarations regarding the origin of the tin used for coating. Based on the information obtained from suppliers, TECHNOKABEL S.A. prepares a CMRT (Conflict Minerals Reporting Template) report, which demonstrates the origin of this material in the manufactured cables and is available to customers upon request.

TECHNOKABEL S.A. declares that it will not engage in cooperation with suppliers of materials or other components used in its supply chain from companies whose activities are inconsistent with this policy.



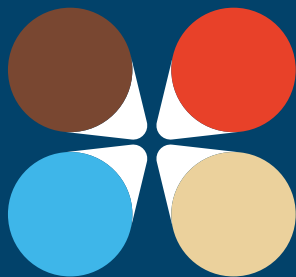
Compliance Verification and Protection.

Annual Compliance Review

- To ensure the effectiveness of the Code, an annual compliance audit will be conducted.
- This review includes an assessment of selected processes exposed to risk (including procurement, sales, and tenders) and an analysis of reports received through whistleblower channels.
- The findings of the verification process will be presented to the Management Board, and necessary corrective actions will be implemented within agreed timeframes.

Whistleblower Protection

- Every individual reporting violations in good faith shall receive full protection against any retaliatory actions.



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