



Code of Conduct of Kabelwerk Eupen AG

This Code of Conduct defines the principles of Kabelwerk Eupen AG and at the same time the requirements for suppliers and business partners of Kabelwerk Eupen AG with regard to their responsibility for people, the environment, safety at work, data protection and cyber security.

Kabelwerk Eupen AG strives to maintain the highest legal and ethical standards. Every employee is expected to act responsibly, with integrity and honesty and to comply with this Code and the policies and instructions upon which it is based.

All activities of Kabelwerk Eupen AG shall be carried out in strict compliance with all applicable laws and under principles of good corporate citizenship.

This Code of Conduct will be reviewed by the Board of Management of Kabelwerk Eupen AG on yearly basis and will be revised if necessary.

Respect for human rights

Kabelwerk Eupen AG supports the application of human rights such as defined in the United Nations's Universal Declaration on Human Rights, which ensures that the causing of and participating in violation of human rights is avoided.

Kabelwerk Eupen AG promotes equal opportunities and equal treatment of all employees regardless of their skin colour, race, nationality, ethnicity, political affiliation, social origin, any disability, sexual identity and orientation, religious conviction as well as their gender or age.

Furthermore, Kabelwerk Eupen AG is committed to respecting the human dignity, personal rights and privacy of its employees and does not tolerate any form of discrimination, harassment or bullying by its employees.

Labour law

Kabelwerk Eupen AG supports basic labour rights and represents the right to form or join an employee organisation as defined by the International Labour Organisation, allowing freedom of association and collective bargaining. Members of such organisations are neither favoured nor disadvantaged.



Furthermore, Kabelwerk Eupen AG strives to comply with the applicable working time regulations worldwide and to pay appropriate remuneration in accordance with the applicable laws.

Kabelwerk Eupen AG does not tolerate any form of forced labour, slavery, servitude or human trafficking and respects the prohibition of child labour in compliance with the age limits according to ILO Convention 138.

Security guidelines

Kabelwerk Eupen AG implements all applicable legal standards in the workplace that protect the health of employees and ensures safety in the workplace. According Belgian Law, the committee for prevention of danger and ensuring safety at the workplace (called AGS in German: Ausschuss für Gefahrenverhütung und Schutz am Arbeitsplatz) meets, discusses, reviews all KPI's and takes appropriate actions on any relevant issue on a monthly basis. A complete report is submitted once a year to the National Authorities.

Furthermore, Kabelwerk Eupen AG conducts training with regard to health and safety at work.

Environmental protection

Kabelwerk Eupen AG endeavours to respect the applicable laws and regulations with regard to the protection of the environment and to consistently implement and improve the measures derived from them.

Furthermore, Kabelwerk Eupen AG makes efforts to achieve sustainable development in the selection of raw materials, processes, products, waste and emissions by using the latest technological advances.

Business conduct

Kabelwerk Eupen AG follows the legal provisions against money laundering and acts according to applicable competition laws and respects intellectual property rights. Kabelwerk Eupen AG promotes transparency, openness and continuous dialogue with all internal and external stakeholders.



Anti-corruption

Kabelwerk Eupen AG undertakes not to tolerate, instruct or participate in any form of corruption, bribery or kickbacks. This also includes offering, granting, soliciting or promising and accepting services, assignments, entertainment, gifts or other benefits, except for a gift or entertainment of a minor value given on an occasional basis, providing it does not create a conflict of interest situation.

Conflict of interest between employees and company shall be avoided.

Data protection

Kabelwerk Eupen AG respects the privacy of its employees as well as the protection of personal data and strives to protect it effectively and to use it in accordance with the law only for legitimate purposes.

Cybersecurity

Kabelwerk Eupen AG endeavours to take reasonable and appropriate organisational as well as technical measures to ensure the confidentiality, authenticity, integrity and availability of operations and of products and services. These measures shall be consistent with good industry practice and shall include an appropriate information security management system that complies with standards such as ISO/IEC 27001 or IEC 62443 (as applicable).

Implementation and sanctions

Kabelwerk Eupen AG communicates this Code of Conduct to its employees and monitors its application.

Kabelwerk Eupen strives for a legally and ethically correct value chain of products and services. Suppliers and business partners play an important role in this. They are expected to conduct their business in accordance with the same legal and ethical standards and business practices as Kabelwerk Eupen AG. Kabelwerk Eupen AG promotes the application of this Code not only by regularly monitoring its own processes, but also by monitoring the actions of its suppliers and business partners. To this end, Kabelwerk Eupen AG may conduct audits, accompanied by customers if necessary.

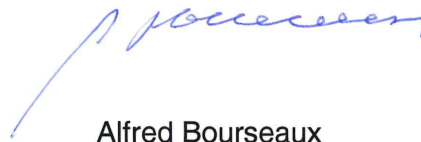


Notification of infringements

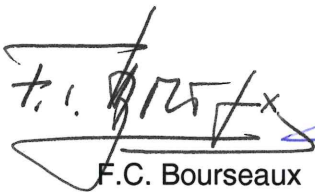
Employees of Kabelwerk Eupen AG are obliged to report violations of this Code to their supervisor or to the management. All reported incidents will be investigated with discretion. Kabelwerk Eupen AG will not take any adverse action against an employee who reports a violation of this Code in good faith.

Violations of this Code may result in a warning, termination of employment and payment of damages. In addition, certain violations may result in criminal sanctions such as fines or imprisonment.

We thank all employees as well as all suppliers and business partners who respect and follow our Code of Conduct.



Alfred Bourseaux
President - Administrateur-délégué



F.C. Bourseaux



E. Thönnès



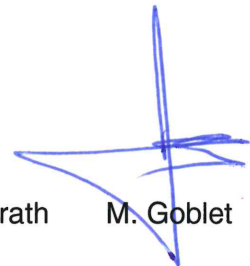
G. Starmans



B. Zeimers



H.-J. Bernrath



M. Goblet