



Code of conduct **DELFINGEN**

TABLE OF CONTENTS

Preamble.....	2
I. Scope of the DELFINGEN code of conduct.....	3
II. Corporate governance and required behaviors.....	4
Required behaviors.....	4
Business principles.....	4
Personal attitude.....	4
Cartels and competition.....	4
III. Environmental principles and respect for human rights.....	5
Environmental principles.....	5
Acting to ensure the robustness of our ecosystem.....	5
Environmental and climate protection.....	5
Environmental protection at DELFINGEN.....	6
Respect for human rights.....	6
Society and social standards.....	6
IV. Data and product security.....	9
Personal data protection.....	9
IT security.....	9
Trade secrets.....	9
Product safety and quality.....	9
V. Business and organizational principles.....	10
Assets.....	10
Finance and taxes.....	10
Fighting against money laundering and the financing of terrorism.....	10
External trade and taxes.....	10
Communication.....	11
VI. Compliance.....	12
Compliance with laws and standards.....	12
Compliance with the code of conduct.....	12
Support and questions - Whistleblowers system.....	12
Preventing and fighting corruption.....	13
Insider information.....	13

Preamble



DELFINGEN is the world leader in cable protection and a key player in responsible mobility. Present in 41 locations worldwide (21 countries), DELFINGEN is a local partner and, thanks to the group's 3,700 employees, a truly trusted global partner.

DELFINGEN is committed to acting responsibly and ethically towards its customers, suppliers, governments and public authorities, and its employees. Integrity in business contributes to the DELFINGEN Group's good reputation.

This is reflected in :

- Our values, stated very early on, amended in 1984 to make them international (freedom, sharing, continuous improvement and responsibility) and updated in 2020: Entrepreneurship, Solidarity, Harmony, and Responsibility;
- Our "Supplier Requirements File", enabling us to select suppliers and partners based on objective criteria;
- A general state of mind of responsibility in the business world, also illustrated by the DELFINGEN Group Corporate Foundation, whose aim is to act in favor of the most disadvantaged populations, in France and worldwide.

In this document, the term "DELFINGEN" refers to the entire DELFINGEN group, i.e. the DELFINGEN GROUP, DELFINGEN and all DELFINGEN group companies in which DELFINGEN directly or indirectly holds a majority stake.

The Code of Conduct has been approved by DELFINGEN's management. This Code of Conduct describes the values and principles of conduct expected of all Partners, their employees and their supply chain. These values and principles of conduct form a binding basis for DELFINGEN's collaboration with its Partners.

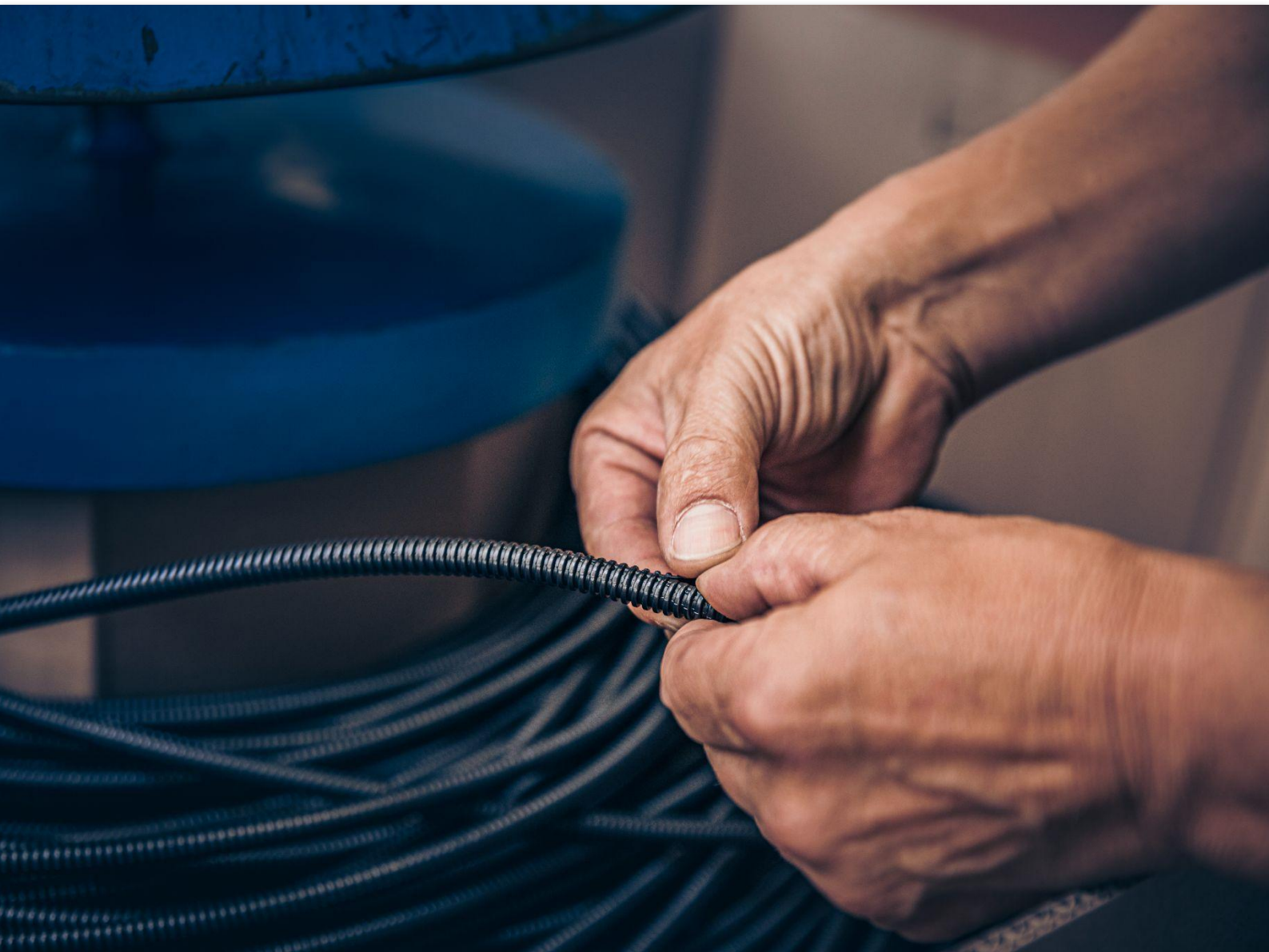
I. Scope of the DELFINGEN code of conduct

The DELFINGEN group and its employees have undertaken to comply with the provisions of this Code of Conduct. DELFINGEN expects the same commitment from its partners.

As such, this Code of Conduct (hereinafter, "Code of Conduct") applies to all suppliers, customers and partners of DELFINGEN and their employees (hereinafter, "Partners").

In addition, this Code of Conduct applies to all Business Partners (natural or legal persons) (hereinafter the "Partner") who sell, acquire DELFINGEN products, supply products, processes or services to the DELFINGEN Group, either directly or through third parties, distribution partners, subcontractors and agents.

By accepting this document, the Partner also undertakes to comply with DELFINGEN's general terms and conditions (of purchase and sale) which are applicable to it and available on the website www.defingen.com.



II. Corporate governance and required behaviors

Required behaviors

DELFINGEN expects its Partner to adopt the following attitudes :

- Integrity, sincerity, responsibility, trust and respect for values in our dealings with employees, business partners, suppliers and third parties in general;
- Lawful behavior through compliance with applicable national and international regulations, in particular concerning cartels, competition, corruption, money laundering, taxation, foreign trade, customs, environmental protection, working conditions, workplace safety, data protection, product liability, product safety - as well as all mandatory regulations;
- Respect for and compliance with free market principles;
- behaving with integrity and honesty towards market participants on the basis of objective, transparent and appropriate criteria;
- Business decisions made without the influence of personal interests or relationships;
- Protection of business secrets and personal data;
- Preservation of professional intellectual property rights and assets in general;
- Compliance with the requirements of a quality management system in accordance with ISO 9001 or IATF 16949 or a comparable standard;
- Compliance with industry-, customer- and product-specific requirements.

Business principles

Personal attitude

Many generations, nationalities, origins, languages, religions, worldviews, backgrounds and experiences come together in the DELFINGEN Group. This diversity is an endless source of enrichment for us.

It is therefore important for us to accept, value and treat all these people equally in our integrity and uniqueness.

All cooperation must be respectful, fair and considerate, whatever our position, function or role.

Cartels and competition

A free market and fair competition presuppose that we make our business decisions independently of other market players and in compliance with anti-trust regulations.

Consequently, in the course of our business activities for DELFINGEN, we do not accept any anti-competitive behavior (such as agreements on prices, capacities or markets), nor do we exploit any dominant market position.

Naturally, we also comply with antitrust requirements at meetings of our corporate bodies and the associations of which we are members.



III. Environmental principles and respect for human rights

Environmental principles

Acting to ensure the robustness of our ecosystem

Sustainability is firmly anchored in DELFINGEN's values. The sustainable generation of added value is based on the unity between the economic, the ecological and the social responsibility of both products and their production, as well as the associated processes and services. DELFINGEN therefore understands that maintaining its economic activity within planetary limits is an issue that cuts across its entire value chain.

DELFININGEN expects its suppliers to comply with all local/regional and international regulations on human rights and health and safety as well as environmental protection law as a basis for all products, processes and services.

Environmental and climate protection

DELFINGEN expects its suppliers to actively assume their responsibilities by measuring their impact on climate change annually using the current Greenhouse Gas Protocol (GHG) methodology (including scope 3) and by defining medium- and long-term greenhouse gas reduction targets.

For the verification and further development of these topics and KPIs (key performance indicators), suppliers are recommended to participate in appropriate initiatives and obtain appropriate ratings (e.g. CDP/Carbon Disclosure Project).

DELFINGEN also reserves the right to ask its suppliers for the carbon footprint (scope 1 to 3) of the products, processes and services they supply to DELFINGEN.

The calculation, evaluation and communication of data must also be carried out in accordance with ISO 14040 standards.

Environmental protection at DELFINGEN

In order to preserve and save natural resources and protect people and the environment, DELFINGEN conducts its business activities in such a way as to minimize and avoid negative consequences. For us, corporate environmental protection means analyzing and controlling all our business processes in terms of their impact on the environment. Our main plants implement an environmental management system and are certified to ISO 14001. The operations of our global sites are oriented towards ISO 14001.

The sustainable management of our environment and natural resources is very important to us at the DELFINGEN Group.

We develop, produce, distribute and use safe products.

We are constantly checking and improving our operating processes, techniques, plants and machines with a view to energy efficiency, the use and reuse of resources and materials, and emissions into the air, water and soil.

- Development, production and use of products in line with sustainable and safe development.
- Improvement of environmentally friendly and energy-efficient means and modes of transport.
- Verification and improvement of company operating processes, techniques and plant and machinery with a view to energy efficiency, the use and reuse of resources and materials, and emissions into the air, water and soil.
- Employment of raw materials and minerals with particular respect for REACH regulations, the RoHS Directive, and minerals involved in conflicts.
- Compliance with the requirements of an environmental management system in accordance with 14001 or a comparable standard.

DELFINGEN strives to maintain the same level of environmental protection at all its sites and expects the same behavior from the Partner.



Respect for human rights

Society and social standards

The rights of our employees: For DELFINGEN, observing and respecting internationally recognized human rights is the basis of all business relations. We comply with the principles and rules set out below, as well as with the labor laws of the various countries in which we operate.

Respect for human rights: Wherever we do business, DELFINGEN complies with applicable human rights laws, in particular those relating to slavery, human trafficking and due diligence in the supply chain. DELFINGEN will not use or tolerate slavery, human trafficking, slavery-like practices or any other form of oppression in the workplace.

No forced or compulsory labor: DELFINGEN rejects any deliberate use of forced or compulsory labor.

No child labor: Child labor is prohibited at DELFINGEN. The minimum age for employment is respected in accordance with the legal provisions in force in the various countries. DELFINGEN respects the minimum age for admission to employment, i.e. at least 15 years according to ILO Convention 138 on the minimum age, which is therefore binding for taking up a position within the DELFINGEN Group. We do not tolerate any form of pressure or coercion.

Protection and safety at work: At DELFINGEN, we are aware of our responsibility to protect and ensure the safety of our employees on a daily basis.

The health, lives and safety of our colleagues are our top priority. DELFINGEN is committed to ensuring the same level of safety at all its sites.

DELFININGEN offers its employees vaccinations against the major pandemics (diphtheria, tetanus, polio, etc.).

Costs not covered by local social insurance are paid by DELFINGEN.

Respect for working hours, granting of leave and payment of fair remuneration: DELFINGEN respects local laws on minimum wages, working hours and working conditions, and grants its employees reasonable rest periods and leave in the event of illness or emergency. We ensure that legal working hours are respected and that minimum legal vacations are granted.

DELFININGEN is committed to applying equivalent wages and benefits for equivalent work at each site, without discrimination.

Anti-harassment policy: DELFINGEN applies zero tolerance to all forms of harassment (moral, sexual, etc.), threats or physical abuse, and to behavior that violates human dignity.

Freedom of association: DELFINGEN respects employees' right to freedom of association and assembly, and grants them the right to collective bargaining for the purpose of regulating working conditions.



Preservation of equal treatment and equal opportunities: DELFINGEN is committed to fighting discrimination and promoting equal opportunities.

DELFINGEN promotes equal treatment, equal opportunities, diversity, fairness and inclusion at all levels for its employees and its supply chain. DELFINGEN undertakes not to discriminate on the grounds of physical appearance, religion or belief, political opinion, gender, age, social or national origin, sexual orientation, gender identity, marital status, state of health or disability, or any other characteristic protected by law and provided they are based on tolerance and democratic principles.

DELFINGEN's policy is to select, hire and promote employees on the basis of their abilities, experience and skills, and to pursue their development accordingly by providing appropriate training.

DELFINGEN makes every effort to retain an employee with more than one year's seniority who is disabled. DELFINGEN makes every effort to arrange working hours for a caregiver with a disability.

Training and personal development: DELFINGEN is committed to providing its employees with appropriate training, and to supporting the personal development of all its employees so that they become more autonomous on a daily basis.

Communication: DELFINGEN undertakes to send communications in all languages applicable to its sites.

IV. Data and product security

Personal data protection

We all want our personal data to be treated with care and confidentiality. We also apply this standard to our employees and business partners.

We process personal data in accordance with current data protection regulations, in particular the provisions of the European General Data Protection Regulation, which we apply as a minimum protection for all our employees and Partners, in compliance with local law.

We adopt the technical and organizational measures necessary to protect personal data.

IT security

The security of our IT systems is of paramount importance to us, as unauthorized intervention can entail considerable risks.

We request access to our IT systems in a timely and traceable manner, in line with internal processes, and only use them for the intended and approved purpose.

Clear and unambiguous authorizations ensure that our IT systems are only used by authorized persons in the course of their duties.

We also ensure that our self-imposed requirements are met when our IT systems are used by our business partners and other third parties.

Several DELFINGEN sites are TISAX-certified. We attach great importance to our partners adopting similar certification for the protection of their data and information systems.

Trade secrets

Creating and exchanging information with business partners and other third parties is an essential part of our day-to-day business. This may also include trade secrets.

We treat all trade secrets in accordance with applicable requirements, particularly with regard to their non-disclosure and use.

Appropriate systems and authorizations enable us to guarantee a high level of protection for the trade secrets of DELFINGEN, our Business Partners and other third parties.

Product safety and quality

DELFININGEN's economic success on the global market depends on the quality, safety and functionality of our products.

DELFININGEN has a harmonized and standardized system across all Group plants. All our production sites are ISO 9001 and IATF 16949 certified.

As a developer, manufacturer and distributor, we comply with legal provisions, binding obligations and industry-, customer- and product-specific requirements.

The high quality, safety and functionality of our products are our top priorities. We are constantly striving to improve.

Regular internal and external audits help us to constantly monitor ourselves and maintain our high quality, safety and functionality.

V. Business and organizational principles

Assets

Property is an essential part of DELFINGEN's assets.

We treat assets (such as laptops, vehicles, machines and materials) with care, thrift and caution, and take the necessary measures to protect them against loss, damage and misuse. We comply with legal provisions, manufacturer specifications and user agreements.

Wherever possible and reasonable, we protect developments and other know-how from unauthorized imitation and use by means of industrial property rights (e.g. patents).

We acquire the necessary rights of use (such as licenses) in good time.

Finance and taxes

Transparent financial reporting and fiscal honesty are not only in DELFINGEN's own interests, but are also essential to the image we project to the public.

We record and document business transactions in full and in accordance with legal provisions (commercial and fiscal), accounting regulations and internal guidelines.

We duly and transparently present and communicate annual accounts and transactions to shareholders, the Advisory Board, consultants, auditors and the relevant authorities.

We pay taxes to the relevant authorities in due form and on time.

Fighting against money laundering and the financing of terrorism

The fight against money laundering and the financing of terrorism are also important for DELFINGEN due to international business relations and the networking of financial systems.

We take all necessary measures to prevent the introduction of illegal funds and assets into the legal economic and financial cycle via DELFINGEN and to ensure that it does not constitute financial support for terrorist activities.

We establish and maintain business relationships exclusively with qualified, reliable and trustworthy business partners. We review existing business partners on the basis of internal procedures.

External trade and taxes

The Group's international positioning, with operations in more than eighty countries, implies a particular duty of vigilance with regard to the compliance of foreign trade operations. All our teams and partners are committed to complying with export control laws and regulations. Under no circumstances will we tolerate any violation of American or European export control regulations. Any failure to comply with these obligations may result in civil or criminal proceedings, with fines or convictions leading to prison sentences. Should our partners be in conflict with these obligations, this will lead to the suspension of the commercial contract.

We expect our partners to comply with all applicable export, import, customs and value-added tax regulations, as well as with the various obligations and lists of international embargoes and sanctions.

Communication

Open, professional, comprehensible and appropriate communication not only enhances our public image, it also promotes and supports our internal cooperation.

We always ensure that our communications stand up to the scrutiny of the public and the authorities.

We take communication and marketing measures only after consulting the relevant departments and obtaining their official approval. We rely on internal models.

We conduct discussions constructively and respectfully. This also applies to giving and receiving feedback and resolving disagreements.



VI. Compliance

Compliance with laws and standards

Compliance with national and international legal requirements is one of our top priorities. DELFINGEN complies with all regulations relating to competition, corruption, taxation, foreign trade, customs, environmental protection, occupational safety, data protection and product safety, wherever we work for the DELFINGEN Group. We are certified to ISO 9001 or IATF 16949, OHSAS 18001 or ISO 45001 and ISO 14001, and we make every effort to ensure that this continues. We comply with DELFINGEN guidelines, business processes and work instructions.

Compliance with DELFINGEN's code of conduct

DELFINGEN stands for respectful, honest, legal and compliant actions in its day-to-day activities at home and abroad. We expect the same from our national and international business partners, particularly with regard to respect for human rights, occupational health and safety, and environmental protection.

DELFINGEN expects its partner to share this code of conduct and to apply it to its employees, partners and subcontractors.

DELFINGEN reserves the right to revise, suspend or terminate its contractual relationship with the Partner at any time and without prior notice in the event of suspicion or evidence of any breach of the Code of Conduct.

DELFINGEN reserves the right to audit the application of the provisions of this Code of Conduct at any of the Partner's sites. This audit may take place on site or virtually during the Partner's normal business hours. This audit may be carried out by an independent auditor, on condition that the auditor is previously bound to secrecy by the signature of a confidentiality agreement.

DELFINGEN will endeavor to cause as little disruption as possible to the Partner's business operations.

The Business Partner undertakes to inform DELFINGEN of any breach of the said code of conduct, either by itself or by one of its partners or sub-contractors.

Support and questions - Whistleblowers system

Thanks to a culture of openness and trust, we help to ensure that no question goes unanswered, and that all issues are addressed.

We solve technical problems together with our colleagues. We succeed best when we work together.

Two opinions are better than one: that's why decisions are taken together according to the double decision rule and the principle of separation of functions.

DELFINGEN has an alert reporting system that is open to all. Contact details can be found on our website, www.delfingen.com.

You can also send an alert using the following link: <https://delfingen.integrityline.com/frontpage>.

Preventing and fighting corruption

DELFINGEN is opposed to and does not tolerate any form of corruption, extortion or bribery. To this end, DELFINGEN has drawn up a code of conduct, in cooperation with Middennext, which all DELFINGEN employees are required to acknowledge and accept, available on its website www.delfingen.com, heading -> [Our ethical commitment](#).

DELFINGEN maintains a zero-tolerance policy towards acts of fraud or any type of corruption, influence peddling, bribery and violation of anti-trust law.

- Trust and transparency in our dealings with Business Partners and other third parties are essential to us.
- Business decisions are made without the influence of personal relationships or interests.
- We refuse to demand, accept, promise or be promised, offer or grant unjustified advantages in exchange for the service of an official or for a business decision.
- We refuse to engage in any action that might even appear to be such.
- We comply with internal requirements regarding gifts, invitations and hospitality.
- Donations and sponsorships are limited to social, charitable or sporting purposes. To this end, a gift policy is available on the DELFINGEN website, www.delfingen.com under -> [Our ethical commitment](#).
-

Any suspected corrupt activity on the part of a Partner may result in DELFINGEN imposing sanctions on that Partner.

Insider information

Insider information, i.e. specific information which, if known to the public, could significantly influence the price of listed securities, must be treated as strictly confidential.

Partners in possession of such insider information are not authorized to use this information for the purpose of trading in securities or other financial instruments.

Nor are they authorized to pass on insider information to third parties or to use it to make recommendations concerning the purchase or sale of securities or other financial instruments.