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PREAMBLE AND PURPOSE

ITALIAN CABLE COMPANY S.p.A. (hereinafter "ICC" or also "the Company"), a leading company in power cables, electrical conductors, special connections, and wiring systems for industrial and special applications, firmly believes that sustainable sourcing is an effective means to promote responsible values and practices throughout the entire value chain.

By striving to build strong and lasting relationships and **partnerships with its suppliers**, ICC aims to promote responsible management throughout its supply chain, also based on principles of fairness, respect for roles, and the sharing of business management principles.

The Company is therefore committed to selecting suppliers who responsibly manage environmental and social impacts, protect their workers' rights, and promote these issues among their subcontractors.

This **Supplier Code of Conduct** (hereinafter also, briefly, the "**SCC**") is an extension of ICC's Code of Ethics, available on the official website www.icc.it, to which suppliers must adhere.

The objective of this document is to share ICC's values with its suppliers and define the behavior standards they must adopt in managing commercial relations with the Company.

By accepting this Code, ICC suppliers commit to acting in accordance with the values and principles contained therein, or to the same or similar principles if present in their own Code of Ethics.

ICC suppliers are required to observe these principles, as well as to ensure that their subcontractors and other parties acting on their behalf also comply. Compliance with the provisions of this Code must be evaluated considering national and international laws and locally applicable regulations.

The SCC is based on values deemed necessary to guarantee fair, honest, and respectful social and economic relations, adhering to ethical principles, Workplace Health and Safety, Environmental protection, quality, sustainable growth, Human Rights, Diversity, and Inclusion. hese principles must be respected, without distinction or exception, by all internal and external stakeholders of the Company, and they also apply to procurement operations, which follow the specific procedure provided for in the Integrated Management System adopted by ICC S.p.A.

The Company believes that building close collaboration with the supply chain is essential to achieving high levels of product quality and customer satisfaction. The mission of ICC S.p.A. is to operate within a framework of competition, commercial fairness, loyalty, honesty, integrity, transparency, and good faith, respecting the legitimate interests of shareholders, employees, customers, partners, and various stakeholders with whom it interacts.



ITALIAN CABLE COMPANY S.P.A.'S COMMITMENT

ICC S.p.A. firmly believes that the way work is conducted is no less important than the results achieved, and under no circumstances should the attainment of corporate objectives prevail over legal or ethical standards.

In fact, ICC considers business ethics and the promotion of values such as loyalty, fairness, and respect as primary values, both within its own organization and in its relations with commercial partners.

In line with the provisions of its Code of Ethics and in the context of integrating social responsibility into its daily operations, ICC considers collaboration with the supply chain fundamental to achieving the highest ethical standards and sustainable business development



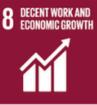
The United Nations 2030 Agenda for Sustainable Development, presented in September 2015, identifies the 17 Sustainable Development Goals (SDGs), which represent common objectives for sustainable development in addressing current social challenges. These goals serve as a reference for the international community, and ICC draws inspiration from them to guide its actions toward more sustainable development.





































CONDUCT PRINCIPLES FOR ICC S.P.A SUPPLIERS

Ethics

ICC suppliers must conduct their activities in an ethically correct manner and act with integrity, in line with the values expressed in the Company's Code of Ethics.

Fight Against Corruption and Conflicts of Interest

The Commitment of Suppliers:

- operate in full compliance with the law, observing all applicable laws on corruption and the guiding principles contained in the ICC Code of Ethics;
- apply, in the selection of their suppliers, the same criteria of impartiality and fairness that ICC adheres to;
- not offer, give, or receive improper payments or other benefits, nor encourage or allow others to do so, in order to obtain or maintain an advantage, even where these practices are considered customary in a specific context;
- not offer ICC personnel gifts or other benefits exceeding normal business or courtesy practices and aimed at obtaining preferential treatment of any kind, even if only potential;
- report any episode of corruption, even if only attempted or suspected;
- report any other fraudulent behavior of any nature, committed by any individual (internal or external to the company);
- avoid situations that present, or appear to present, a potential conflict of interest.
 During the commercial relationship with ICC, suppliers should never seek to benefit from their personal relationship with the Company's employees;
- if a conflict of interest arises, whether potential or actual, suppliers must inform ICC promptly.

Fair Competition and Compliance with Applicable Laws

CC believes in fair and sustainable competition as a means to select the best suppliers and improve the quality of the procurement of goods and services.

The Company ensures compliance with competition laws in the markets where it operates and commits to cooperating with market regulatory authorities, refraining from collusive and abusive behaviors of dominant positions.

The Commitment of Suppliers:

- conduct their activities according to the principles of fair and healthy competition, respecting all applicable laws.
- report any anti-competitive behavior, even if only suspected;
- commit to using fair business practices, including accurate and truthful advertising.



Privacy, Confidentiality, & Information Security

The Commitment of Suppliers:

- · act in accordance with current privacy laws concerning their workers and respect their data protection rights. Furthermore, if suppliers have access, during performance of their activities, to personal related data **ICC** employees, to collaborators, clients, etc., they must collect and store only the personal data legally permitted and actually necessary for the performance of their activities, and, as external data processors, adopt suitable measures to protect such data.
- suppliers must never disclose sensitive information concerning ICC to third parties unless explicitly authorized by the Company.

Labor and Human Rights

ICC suppliers must recognize the human rights of their workers, treat them with dignity and respect, and adopt ethical labor practices and procedures

The Commitment of Suppliers:

- guarantee working conditions for their personnel that comply with locally applicable regulations, collective agreements, and relevant conventions;
- promote equal opportunities for their employees and ensure fair treatment regardless of skin color, race, nationality, social background, disability, sexual orientation, political or religious beliefs, gender, or age;
- respect the personal dignity, privacy, and legal and contractual rights of each individual;
- prohibit any behavior that is violent, discriminatory, sexually offensive, coercive, threatening, abusive, or exploitative;
- provide adequate remuneration and guarantee the current national mandatory minimum wage;

- recognize their workers' right to join labor organizations and collective bargaining where workers choose to do so;
- promote open communication about working conditions, without workers fearing retaliation or punishment;
- not engage in forms of forced or compulsory labor, involuntary prison labor, slavery, or human trafficking;
- not tolerate, nor use, child labor at any stage of their activities. Therefore, no supplier may employ individuals who have not reached the minimum age for employment, as provided by the legislation of the reference country;
- ensure equal treatment opportunities for workers in processes governing all stages of the employment relationship (hiring, training, promotions, reorganizations, etc.);
- remunerate their employees for the work performed, in accordance with applicable laws or national collective labor agreements;
- provide regular payment of contributions to their employees;
- promote a workplace culture that values diversity and inclusion, also through awareness and training activities for staff.

Health and Safety at Work

ICC S.p.A. requires compliance with regulations on the protection of health and safety in the workplace and considers the safeguarding of workers' safety and health, as well as the continuous improvement of working conditions, of primary importance. To implement its workplace safety policy, ICC S.p.A. ensures continuous training and awareness of all personnel on safety issues.

The Supplier's Commitment:

- operate in compliance with applicable laws and the requirements set by relevant regulations;
- monitor hazards and take the most appropriate precautionary measures against accidents and occupational illnesses;
- actively promote the health and safety of those working at its premises, offer training activities, and ensure that employees are consistently trained and informed about workplace health and safety issues;
- establish or use a health and safety management system in accordance with the ISO 45001 standard or an equivalent system.

protection, in order to avoid or minimize any negative impact on the environment.

The Supplier's Commitment:

- act in compliance with statutory and international environmental protection regulations;
- minimize environmental impact by implementing an effective environmental policy;
- conduct training and provide information to staff;
- establish or use an environmental management system in accordance with the ISO 14001 standard or an equivalent system.



Environment

ICC is committed to environmental protection, complies with current international and national environmental regulations, and raises awareness among employees and collaborators on topicsrelated to environmental respect and



MONITORING AND REPORTING

The Supplier commits to granting permission to representatives or any third party authorized by ICC S.p.A. to verify compliance with the standards defined in this Supplier Code of Conduct (CCF).

In general, if the Company finds that the Supplier is not meeting the requirements and standards defined in this CCF, the Company may provide guidance on the issues to be addressed, and the Supplier commits to promptly taking the necessary actions to remedy them. Similarly, the Supplier is required to evaluate its own suppliers and ensure that they comply with the contents of this document. However, it is understood that in case of violation of the CCF provisions, the Company reserves the right to immediately terminate the contractual relationship and cease ongoing business relations with the Supplier.

A constant and constructive dialogue is the basis of the relationship between ICC S.p.A. and its suppliers. Any suspected or confirmed violations of the contents of this document must be appropriately communicated through the reporting channels established by the Company and regulated by the WB Procedure, published on the official website www.icc.it, in the Whistleblowing section.

ICC S.p.A. aims to promote lasting relationships with its Suppliers to continue strengthening the partnership in favor of a fair, sustainable, and transparent supply chain.

Therefore, the Supplier:

 commits, in performing its services, to observe the contents and comply with the principles and values of the Code of Ethics and the provisions of the Organization, Management, and Control Model of ICC S.p.A., made available on the official website;

- agrees to respect and comply with the principles of this CCF, which constitute an essential prerequisite for the ongoing business relationship with the Company, maintaining, for the entire duration of the contract and for 5 years after its termination, documentation certifying compliance with the provisions of this CCF and current regulations;
- spread and ensure compliance with the provisions of this CCF among its employees, suppliers, external collaborators, and other parties involved in the supply chain, verifying their respective compliance;
- Agrees to provide information, certifications, accreditations, and/or documents referenced in the Purchase Conditions and/or requested by the Company, which demonstrate compliance with this CCF;
- agrees that ICC S.p.A. or a third party appointed by it may conduct audits/inspections in accordance with the commitments, agreements, or contracts entered into with the Company;
- commits to transmitting this Code of Conduct to its suppliers, implementing a due diligence process throughout the supply chain for its employees, agents, subcontractors, suppliers, and subsuppliers, to the extent that they are involved in the supply of goods and/or services to ICC S.p.A.;

Failure to comply with the CCF may lead to the termination of the commercial relationship between ICC and its supplier if the latter fails to demonstrate the implementation of appropriate corrective measures within a reasonable timeframe.

The document may be updated and reviewed regularly to reflect the lessons learned from the continuous improvement process between ICC and its suppliers. The current version of the CCF is also available on the Company's website www.icc.it. In case of conflict between legal provisions and this Code, the legal provisions shall prevail.

